



# California Regional Water Quality Control San Francisco Bay Region

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TREASURE ISLAND  
SSIC NO. 5090.3.A



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Date: December 1, 1999  
File No. 2169.6013 (CRM)

Commanding Officer  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, CA 94066-2402  
Attention: Mr. Ernesto Galang

**Subject: Comments Regarding Draft Field Sampling Plan Addendum for Additional Investigation in the Vicinity of Buildings 1205/1207, 1244, 1251/1253, and Debris Disposal Areas C and D at Naval Station Treasure Island, San Francisco**

Dear Mr. Galang:

## Introduction

On November 29, 1999 Regional Board staff (Board staff) met with representatives of the Navy, Department of Toxic Substances Control (DTSC), United States Environmental Protection Agency (USEPA), and the City of San Francisco. The purpose of the meeting was to discuss the above-referenced technical report, which was received on November 23, 1999. During the meeting, Board staff verbally provided our comments on the technical report to facilitate prompt implementation of the scope of work. We understand that site activities were initiated on the day following the meeting. The purpose of this letter is to document our verbal comments from the meeting.

## Completion of the Remedial Investigation

For the purpose of this scope of work, Board staff generally concurs with the problem description provided on page 2, which states: *"The problem is to determine whether debris or other evidence of contamination is present in these areas, and to determine if any debris that may be present in the area poses a human health risk."* We also concur that it would be unreasonable to state in the report all of the regulatory issues that the technical report will not resolve. However, as currently written, the technical report gives the impression that the described problem is the only outstanding issue to complete the RI for the debris disposal areas at Site 12.

The Navy should take measures to accurately acknowledge that the proposed scope of work will not resolve all of the Remedial Investigation (RI) issues for debris disposal areas at Site 12. Specifically, the scope of work will not address water quality issues, may not fully evaluate risk to human health, and may not fully define the extent of soil contamination. These regulatory issues have been provided to the Navy on numerous occasions in writing by Board staff, the DTSC, and the USEPA. Based on the findings of our meeting, Board staff understands that the Navy is aware of the need to resolve these issues to complete the RI.

*California Environmental Protection Agency*

**Figures**

Figures included in the technical report illustrate the location of the proposed trenches. The figures do not include previous soil borings and ground water monitoring wells installed during the RI process, and do not include the resultant analytical data. This information would be extremely useful for the agencies to evaluate the adequacy of the trench locations and the proposed sampling and analysis plan. We suggest that future figures proposing sampling locations include the relevant data from previous investigations.

**Sampling for Polychlorinated Biphenyls (PCBs) and Pesticides in Soil**

As proposed in the technical report, PCBs and pesticides would be included in the laboratory analysis only if soils exhibit odor and/or elevated PID readings. Recent investigation in the Former Storage Yard indicated elevated concentrations of PCBs in soil without odor, staining, or elevated PID readings. Pesticides may also be present in soil without exhibiting these field characteristics.

Board staff concurs with comments made by the Navy during our recent meeting that RI investigation activities already conducted at Site 12 do not suggest the need for widespread analysis for PCBs and pesticides. The former storage yard was unique in that no investigation was previously conducted in this area. However, we do suggest that the Navy review the existing RI data to determine if PCBs and/or pesticides were previously detected during the RI in the vicinity of any of the proposed trenches. If PCBs and/or pesticides were previously detected in the soil in the area of one or more proposed trenches, we suggest that these contaminants be included in the laboratory analysis for those trenches in proximity to the detected contaminants.

If you have questions regarding these comments, please feel free to call me at (510) 622-2377.

Sincerely,



Chris Maxwell  
Associate Engineering Geologist  
Ground Water Protection and Waste  
Containment Division

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