

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

700 HEINZ AVENUE, SUITE 200  
BERKELEY, CALIFORNIA 94710

(510) 540-3724

N60028\_000073  
TREASURE ISLAND  
SSIC NO. 5090.3.A



February 10, 1992

Commanding Officer  
Western Division  
Attn: Mr. Ernesto Galang, Code 1813  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, California 94066-0720

Dear Mr. Galang:

**MODIFICATION LETTER - DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
FINALIZATION OF THE WORK PLAN (DATED 12/26/91) AND FIELD SAMPLING  
PLAN (DATED 12/26/91) FOR THE REMEDIAL INVESTIGATION/FEASIBILITY  
STUDY AT NAVAL STATION TREASURE ISLAND, CALIFORNIA**

On January 30, 1992, the Department of Toxic Substances Control (Department) mailed Navy a letter with comments for the above document. The Department hereby modifies the letter of January 30, 1992 by replacing comment #2 with the following comment:

2. The Navy shall address the RWQCB comments of November 14, 1991 and the comments noted in their letter written to this office (enclosed) dated February 5, 1992 to the full satisfaction of the RWQCB.

The remaining contents of the original letter remain valid unless otherwise notified. If you have any questions, please call me at (510) 540-3809 or leave a message on my phone mail at (510) 540-3955.

Sincerely,

A handwritten signature in black ink, appearing to read "Guillermo Montes".

Guillermo Montes  
Waste Management Engineer  
Site Mitigation Branch  
Region 2

cc: See next page

73

DN 13

Mr. Ernesto Galang  
February 10, 1992  
Page Two

cc: Commanding Officer  
Building One, Code 84  
Attn: Mr. Jim Sullivan  
Staff Civil Engineers Office  
NAVSTA Treasure Island  
San Francisco, California 94103

Ms. Barbara Smith  
San Francisco Bay  
Regional Water Quality Control Board  
2101 Webster Street, Suite 500  
Oakland, California 94612

Mr. David Wells, Senior Inspector  
City and County of San Francisco  
Department of Public Health  
101 Grove Street, Room 207  
San Francisco, California 94102

Mr. Jim Polisini  
Cal-EPA, Department of Toxic Substances Control  
Technical Services, HQ  
P.O. Box 806  
Sacramento, California 95812-0806

ADMIN RECORD (3 COPIES)

## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

WEBSTER STREET, SUITE 500

OAKLAND, CA 94612

(510) 464-1255

RECEIVED  
FEBRUARY 5, 19921992 FEB -6 PM 2:44 (BMS)  
TSCP/REGION 2

Mr. Guillermo Montes  
 Department of Toxic Substances Control  
 700 Heinz Avenue, Blvd. F, Suite 200  
 Berkeley, CA 94710

**Subject: 1. Final Remedial Investigation/Feasibility Study, Work Plan Revision 1, Naval Station Treasure Island, California, December 26, 1991**

**2. Final Remedial Investigation/Feasibility Study, Field Sampling Plan Revision 1, Naval Station Treasure Island, California, December 26, 1991**

Dear Mr. Montes:

The staff of the San Francisco Bay Regional Water Quality Control Board (SFRWQCB) has completed its review of the above documents received in our office on January 2, 1992. The RWQCB staff believes that the documents do not fully address several important technical issues that will bear on the acceptability of future work. Presented below are general and specific comments that should be addressed. It is not necessary to submit a revised version of the Workplan, however, it is important to submit responses to the comments and, where appropriate, an addendum to the Workplan which may be inserted as an Appendix.

**1. Final Remedial Investigation/Feasibility Study, Work Plan Revision 1, Naval Station Treasure Island, California, December 26, 1991**

**GENERAL**

The use of MCLs as a guide for the determination of detection limits in groundwater is only appropriate in areas where the groundwater is considered a potential drinking water source and the primary concerns are human health effects. The analyses of groundwater and storm water samples must have sufficiently low detection limits as to be ecologically relevant. These limits must be able to distinguish organics and metals at levels equivalent to the NPDES discharge limits of the RWQCB. These values are listed in the amended Basin Plan (1991). The relatively high detection limits (MCLs) will not be appropriate or acceptable for the evaluation of potential environmental health effects of surface and groundwater discharged to San Francisco Bay. Similarly, the use of CLP detection limits for soil and sediment analyses will not be appropriate for determining environmental health effects in these media. Data for the Environmental Health portion of the Risk Assessment will need to have lower detection limits that will be defined as the appropriate portions of the RI Work and Sampling

Plans are reviewed.

#### SPECIFIC

- a. p. 47, Section 3.4: There was no discussion of the Porter Cologne Water Quality Act, nor the San Francisco Bay Region Basin Plan, nor SFRWQCB oversight of landfills under Title 23 of the California Code of Regulations, in the discussion of the preliminary identification of ARARs. These laws and regulations should have been included.
- b. p. 71, Section 4.1.2.2: See above, General Comment.
- c. p. 72, Section 4.1.2.3: See above, General Comment.
- d. p. 76, Section 4.2.5: See above, General Comment.
- e. p. 81, Section 5.3.5, Paragraph 1, Sentence 3: Modify to read, "...which may continue to act as a source of the groundwater contamination."

**2. Final Remedial Investigation/Feasibility Study, Field Sampling Plan Revision 1, Naval Station Treasure Island, California, December 26, 1991**

#### GENERAL

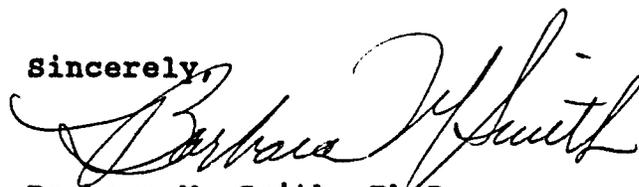
The use of black electrical tape as a mechanism for securing caps on sample tubes has been demonstrated to be the likely cause of contamination by toluene and other volatile compounds in samples analyzed from Hunters Point Annex. Because there are other ways to secure the ends of the samples, this practice is strictly forbidden for soil and sediment samples to be taken for Treasure Island.

#### SPECIFIC

- a. p.13, Section 4.5: The use of PID or OVA equipment to distinguish stratigraphic changes may be unsuccessful since the majority of low molecular weight hydrocarbons will have been volatilized, metabolized or otherwise removed from the sediments by physical and biological activity. The use of visual and olfactory evaluation of the presense of petroleum may serve to be more useful for logging the sediment cores. The collection and analyses of stratified samples is crucial to the understanding of the vertical extent of contamination at Site 21. At a minimum, three samples should be composited from each core sample (0 to 1 ft, 1 to 2 ft, and 2 to 3 ft).
- b. p. 32, Section 5.19: The number of sediment samples should be listed as three per location.

If you have questions, please call me at (510) 464-4222.

Sincerely,

A handwritten signature in cursive script that reads "Barbara M. Smith". The signature is written in black ink and is positioned above the typed name.

Barbara M. Smith, Ph.D.  
Toxics Cleanup Division