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5 Aug 1992

California Environmental Protection Agency  
Department of Toxic Substances Control, Region 2  
Attn: Mr. Tom Lanphar  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710

Subj: REMEDIAL INVESTIGATION/FEASIBILITY STUDY FOR NAVAL STATION  
TREASURE ISLAND

Dear Mr. Lanphar:

The Navy is presently executing the Remedial Investigation/Feasibility Study for Naval Station Treasure Island. Our contractor has suggested a potential change in scope to the existing work plan for Site 8, Army Point Sludge Disposal Area that will be beneficial to the suitability of information derived from the field activities.

Specifically, Site 8 is located on Yerba Buena Island (YBI) at an elevation of approximately 60 feet above mean sea level. Disposal of waste sludge materials reportedly occurred at Site 8 between 1968 and 1976. Previous sampling at the site has indicated that detectable levels of DDT are present at the site. The elevated levels of DDT may be from weed control spraying, as no indication of DDT disposal at the site has been reported. Additionally, lead and cadmium were detected at potentially elevated levels at the site. It is presently unknown whether these metals concentrations are, in fact, elevated relative to background levels in the vicinity of the site, as comparison of the detected concentrations to published crustal concentrations is equivalent.

The RI/FS Work Plan currently calls for the advancement of 6 borings at the site to depths of 60 to 70 feet below the existing ground surface (bgs) and the completion of 3 of these borings as groundwater monitoring wells. Soil samples collected from the borings and groundwater from the wells are scheduled to be analyzed for organochlorine pesticides and metals.

The Navy reconsiders whether the installation of 6 borings to depths of 60 to 70 feet bgs is warranted. Specifically, organochlorine pesticides in general, and DDT in particular, are relatively non-mobile in the environment. DDT is normally present where applied to vegetation within the upper few feet of the soil column. Additionally, at present, the relative concentrations of lead and cadmium are not known to be elevated.

Therefore, based on the above information, the Navy proposes a sampling approach that addresses potential impacts associated with the sludge material and the upper portion of the soil column. If elevated levels of the chemicals of concern are not identified in the sludge or the surficial soils, then impacts to groundwater (and deeper soils), estimated to be present at approximately 60 feet bgs would likely have a low potential for impact from the chemicals of concern due to their attenuated mobility.

The revised sampling approach would include an increased number of borings to a maximum of 10 feet bgs with 2 samples collected from each boring. Each soil boring would provide for the collection of one soil sample in the area of sludge material disposal and one from the soil underlying the sludge material. Additionally, a soil sample could be collected from the native

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surficial soils not suspected of receiving sludge to be used to estimate background levels of metals in the native soils. The additional shallow soil borings would provide information to assist in delineating the thickness and extent of contamination of the sludge.

The additional soil borings would provide better investigation coverage to define the sludge material disposal area. Additionally, a sample collected from nominally non-impacted native soils would be obtained to estimate the background levels of metals in the native soils. This would provide data to estimate whether the lead and cadmium concentrations previously determined are significantly elevated above background concentrations. Potential negative aspects of the proposed change in scope include the lack of ground water quality data derived from the installation and sampling of the wells. However, the results of the revised work plan scope could result in information suggesting that ground water quality data are not necessary if elevated levels of the chemicals of concern are not determined by laboratory analysis to be present. Furthermore, monitoring wells in the vicinity of Yerba Buena would still be used. In the event the analytical results indicate contamination has migrated beyond the surficial soils, then a Phase II remedial investigation would propose installing the deep wells as originally proposed.

This proposal will be discussed in the scheduled monthly progress meeting on August 7, 1992. A variance to the approved work plan for Site 8 would be developed for review and approval and a decision on the proposed revised sampling approach must be made by August 14, 1992 since field sampling activities are currently underway.

Should you require additional clarification on these field activities, please contact Mr. Ernesto M. Galang, Code 1813EG at (415) 244-2560.

Sincerely,

GILBERT A. RIVERA  
Head, Installation Restoration Section

Copy to:

Environmental Protection Agency, Region IX (Attn: Julie Anderson)  
California Regional Water Quality Control Board (Attn: Barbara Smith)  
NAVSTA Treasure Island (Attn: Jim Sullivan)  
COMNAVBASE San Francisco (Attn: Randy Friedman)  
Bay Area Air Quality Management District (Attn: Scott Lutz/Brian Jennison)  
U. S. Fish and Wildlife Services (Attn: Steve Schwartzbach)  
California Department of Fish and Game (Attn: Mike Rugg)  
National Oceanic & Atmospheric Administration (Attn: Denise Klimas)  
U. S. Army Corps of Engineers (Attn: Sharon Morlund)  
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