

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
100 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737



September 1, 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:

VARIANCE TO THE REMEDIAL INVESTIGATION/FEASIBILITY STUDY WORK PLAN FOR NAVAL STATION TREASURE ISLAND

The Department of Toxic Substances Control (Department) is in receipt of three letters dated August 5, 1992 from Navy identifying variances to the approved Remedial Investigation/Feasibility Study Workplan. These variance requests apply to the sampling numbering scheme; ground water wells at Site 8, Army Point Sludge Disposal Area; and geophysical surveys at Sites 20, 22, 24, and 25.

The Department agrees that a change in the sample numbering scheme for field samples will not have an adverse impact on the project and may actually improve the identification of field samples. The variance to the sample numbering scheme is approved.

The approved Workplan calls for the installation of three ground water monitoring wells and three soil borings at Site 8, Army Point Sludge Disposal Area. As stated in the work plan these borings would be drilled to ground water, 60-70 feet below ground surface (bgs). The Navy now proposes a sampling approach that addresses potential impacts associated with the sludge material and the upper portion of the soil column. The revised sampling approach suggests an increased number of borings drilled 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. At the Monthly Progress Review meeting on August 7, 1992, PRC proposed increasing the number of soil borings to at least 6. At that time the Department expressed agreement with the new proposal. The variance to the work plan at Site 8 is approved.

The final proposed variance to the workplan eliminates geophysical survey work at Sites 20, 22, 24, and 25. In the August 5, 1992 letter the Navy stated that intrusive activities (excavation) performed at Sites 20, 22, and 25 has provided direct information to support removal of underground storage

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tanks. On Monday, August 10, 1992 a site visit was conducted by Ken Bowen, Field Operations Manager from PRC, Gordon Ballentine, Geophysicists from PRC and myself. The site visit was planned at the August 7, 1992 Monthly Progress Review meeting. Based on the site visit and a review of the available information the Department makes the following comments and conclusions:

1. Site 20: The Auto Hobby Shop is closed on Mondays, therefore, access was not available. Tank excavations have already taken place at Site 20. The Department's concern is that all tanks in the area have not been identified and removed. The work plan identifies Site 20 as the Auto Hobby Shop/Transportation Center. The Transportation Center was made up of several buildings, including buildings 224, 267, and 184. All buildings except the Auto Hobby shop have been demolished. The Navy must support its claim that all underground tanks and lines have been identified and removed. Previous uses of all buildings in the Transportation Center need to be described. Tanks already removed must also be described. Without more information the Department cannot conclude whether a variance to the work plan at Site 20 is appropriate.
2. Site 22: Three tanks have already been removed from the Navy Exchange Service Station. Based on these removals, the Navy proposes not to conduct a geophysical survey. The Department requests information on the past use of service island south of Building 330 and of a building which was once located south of Building 330. The geophysical survey proposed by PRC would be to conduct a perimeter survey around building 330 to identify lines which may lead to underground tanks. The Department's concern at this site is that all tanks have not been identified and removed. More information is needed about activities at the Service Station before a conclusion can be made.
3. Site 24: The area included in the 5th Street Fuel Release site is extensive. The Department agrees that conducting a geophysical survey of the entire site is not practical. The purpose of the proposed geophysical survey was to identify abandoned leaking fuel oil pipelines. The Navy now proposes to identify the location of the pipeline through a record review. According to the Draft Environmental Impact Statement Candidate Base Closures/Realignment San Francisco Bay Area (Department of the Navy, August 1990) the line was apparently abandoned in the 1950's and leaked as much as 10,000 gallons of fuel at three places along fifth

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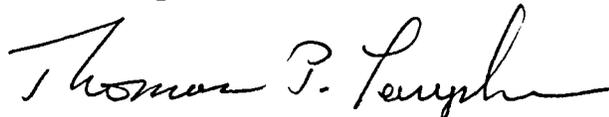
Street; consequently, during 1986 and 1987, 125 cubic feet of soil was excavated. A cathodic protection system was installed along the pipeline between 1980 and 1985 to protect the pipeline from corrosion. Although all this information was available, the Navy now proposes to review records to identify the location of the abandoned pipeline. This information should have already been incorporated into the RI/FS work plan. The Department accepts the Navy's proposal to again review records to identify the location of the pipeline; however, the Department is concerned that conducting record reviews after field work has been completed will hinder the Navy's ability to meet the scheduled deadlines. Further, geophysical work may still be required if this recent review fails to define the pipeline's location.

4. Site 25. According to Ken Bowen, PRC, excavations performed under the UST program at the Sea Plane Maintenance site was not able to locate 10 underground aviation fuel tanks. During the site visit on August 10, 1992 potential fuel lines were identified in this area. During the site visit, Ken Bowen stated that early aerial photos show the aviation fuel tanks being installed in the area south of Building 2. The Department does not accept the Navy's proposal to not conduct geophysics at Site 25; however, the area where a geophysical survey will be done can be better defined. A geophysical survey could be limited to the area south and east of Building 2.

The Department's information requests for Sites 20 and 22 and the Navy's record review at Site 24, may result in geophysical work being conducted at a later date. Geophysical work at Site 25, however, should be incorporated into the current investigation and should begin as soon as possible.

If you have any questions regarding the variance request, please call me at (510) 540-3809.

Sincerely,



Thomas P. Lanphar
Associate Hazardous Materials
Specialist
Site Mitigation Branch

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cc: Ms. Barbara Smith
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