



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

February 22, 1994

BML 2/23/94

Ernesto M. Galang
Western Division - Code T4A2EG
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-2402

Re: Draft Base Realignment and Closure Cleanup Plan (BCP) for
Naval Station Treasure Island dated January 27, 1994

Dear Mr. Galang,

The U. S. Environmental Protection Agency (EPA) has received and reviewed the subject document and submits the following comments.

EPA received this document on January 28, 1994. As requested by the cover letter, we are providing comments by the requested date of February 22, 1994. Since our time for review on this document was limited, we would like to review and comment on the draft final version of the BCP if one is planned.

If you have any questions, please call me at (415) 744-2405.

Sincerely,

Rachel D. Simons

Rachel D. Simons
Remedial Project Manager
Federal Facilities Cleanup Office

Enclosure

cc: Jim Sullivan, Naval Station Treasure Island
Tom Lanphur, California Environmental Protection Agency
H-9-2 File

Admin Record (3 copies)

DRAFT BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP)
NAVAL STATION TREASURE ISLAND - SAN FRANCISCO, CALIFORNIA
DATED JANUARY 27, 1994

General Comments

1. The following sections should be included in the BCP as specified by the Department of Defense's BRAC Cleanup Plan Guidebook, Fall 1993 Table 5-1 BRAC Cleanup Plan Format:

- Excavation of Contaminated Materials (Section 6.8)
- Cleanup Standards (Section 6.11)
- Bias for Cleanup Instead of Studies (Section 6.20)
- Expert Input on Contamination and Potential Remedial Actions (Section 6.21)

If these sections are not applicable to Naval Station Treasure Island, they should be included in the BCP with an explanation of why they are not applicable.

Specific Comments

1. **Section 3.5 Status of Community Involvement, Page 3-23**

Restoration Advisory Board (RAB) and Technical Review Committee (TRC)

This section should include a definition of the community and its location and an explanation of how the members of the RAB were recruited. Keep in mind that RAB members should reflect diverse interests within the local community. For information on the formation of a RAB, refer to the DTSC Interim Guidance for Implementing Restoration Advisory Boards dated November 1993.

2. **Section 3.5 Status of Community Involvement, Page 3-23**

Mailing List

This section should include an explanation of how the mailing list was compiled and who "the interested parties in the community" are. If requested, the EPA can assist the Navy in formation of the RAB and compilation of the mailing list.

3. Section 4.1.2 OU Designations, Page 4-2

Explain how sediments and storm water will be addressed in the proposed OUs.

4. Section 4.1.4 Early Action Strategy, Page 4-4

The last paragraph states that two treatability studies, bioremediation for soil and ultraviolet oxidation for groundwater, have been recommended. A list of which sites the treatability studies have been selected for should be included. Also, explain why these treatability studies have been chosen for Early Action Strategies and why these treatment technologies were selected over other technologies.

5. Section 6.5 Risk Assessment, Page 6-7

The last sentence states that "If the community does not specify a future land use, the Navy will use the current land use for risk assessment calculations to determine cleanup levels."

For closing bases, it is difficult for anyone to predict what the future use of the land will be. Every site (groundwater or soil or both) should have a risk assessment performed during the remedial investigation using both industrial and residential scenarios. A feasibility study should then be done if the risk for either scenario is greater than 10^{-6} . Then a risk management decision can be made to decide if remediation is warranted for the site. Cleanup levels will then be determined based on many factors including technical practicability, cost and future land use.

6. Section 4.3.1 Natural Resources Strategy, Page 4-7

The subsections in Section 4.3.1 need more detail, and the strategies need to be explained.

For Example: Threatened and Endangered Species

This subsection states that the presence of several threatened or endangered species is confirmed and that no further steps are planned. "No further steps" needs to be explained. Does this mean that there are no more steps planned to locate endangered species or no steps planned to protect these species? Could the presence of these species limit future land use? Has this information been considered in the Ecological Assessment? These questions need to be answered for each subsection (Rare or Sensitive Habitat, Wetlands, etc.).