

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2

HEINZ AVE., SUITE 200  
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(510) 540-3809

March 8, 1994



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:

**DRAFT INITIAL SCREENING OF TECHNOLOGIES, NAVAL STATION TREASURE ISLAND**

The California Environmental Protection Agency (Cal/EPA) has reviewed the draft Initial Screening of Technologies (IST) for Naval Station Treasure Island (NAVSTA TI). Comments regarding this document have been prepared by the Department of Toxic Substances Control (DTSC) and the San Francisco Regional Water Quality Control Board (SFRWQCB). This letter transmits the comments of the DTSC and the SFRWQCB. Attached are those comments.

Review of the Document leads to the following comments which are provided in summary form:

1. Chapters One and Two are taken from the Draft Remedial Investigation Report for NAVSTA TI. These Chapters and Tables associated with them, must be rewritten in accordance to comments from Cal/EPA dated February 4, 1994.
2. This document is an initial screening of remedial technologies for NAVSTA TI. This screening does not preclude the use of a technology initially eliminated in this report. The next phase of the RI investigation will provide additional information which may alter some conclusions presented in this document. Further, the Navy or the regulatory agencies may become aware of other technologies, or applications of technologies previously eliminated that may be applicable at NAVSTA TI. Modifications to this document may be necessary after the Phase II RI.
3. Remedial alternatives for site derived sediments were not discussed in this document. Sediments at NAVSTA TI are suspected of being contaminated; therefore, remediation techniques for this media should be included in the IST.

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4. Remedial alternatives for various contaminants (i.e., PETN (explosives), pesticides, and PCBs) were not discussed in this document. Because these contaminants are being investigated at NAVSTA TI, a discussion of what remediation techniques are available to remove them should be included in the IST.
5. According to RWQCB Resolution No. 88-160, reclamation of treated groundwater is the primary disposal option accepted by Cal/EPA. Reclamation alternatives of treated groundwater should be included in this document.

You must respond to all comments. If you have questions regarding these comments, please contact Thomas Lanphar at (510) 540-3809, who will coordinate a response.

Sincerely,



Thomas P. Lanphar  
Project Manager  
Office of Military Facilities

Enclosure(s)

cc: Ms. Gina Kathuria  
San Francisco Bay  
Regional Water Quality Control Board  
2101 Webster Street, Suite 500  
Oakland, California 94612

Mr. Jim Sullivan,  
BRAC Environmental Coordinator  
Code 80  
Naval Station, Treasure Island  
410 Palm Avenue  
San Francisco, California 94130-0410

Ms. Rachel Simons  
U.S. Environmental Protection Agency  
H-92  
75 Hawthorne Street  
San Francisco, California 94105

*Admin Record (3 copies w/o attachment)*

Thomas P. Lanphar  
Project Manager  
Office of Military Facilities

March 8, 1994

**DETAILED COMMENTS OF THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
ON THE DRAFT INITIAL SCREENING OF Technologies, NAVSTA TI**

1. Chapters One and Two are taken from the Draft Remedial Investigation Report for NAVSTA Treasure Island. These Chapters and Tables associated with them, must be rewritten in accordance to comments from Cal/EPA dated February 4, 1994.
2. Many of the Tables presented in this Chapter are based on data presented in the Phase I, RI Report. Information collected during the Phase II RI may change the conclusions presented in these Tables 3, 4, 6, 7, 8, 9, 10, 18, 19-36.
3. Attached to this letter is "Treatment Technologies Applications Matrix For Base Closure Activities," November 1993. This document should be used when preparing the final Initial Screening of Technologies and included in the References section.
4. This document is a initial screening of technologies for NAVSTA Treasure Island. This screening does not preclude the use of a technology initially eliminated in this report. The next phase of the RI investigation will provide additional information which may alter some conclusions presented in this document. Further, the Navy or the regulatory agencies may become aware of other technologies, or applications of technologies previously eliminated that may be applicable at NAVSTA Treasure Island.

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**  
**San Francisco Bay Region**

**Internal Memo**

TO: Shin-Roei Lee, DoD Section Leader  
FROM: Gina Kathuria, Project Manager, (510) 286-4267  
DATE: March 7, 1994  
SUBJECT: COMMENTS ON NAVAL STATION TREASURE ISLAND DRAFT INITIAL  
SCREENING OF TECHNOLOGIES, DATED 1/3/94

GENERAL COMMENTS:

1. It is inappropriate to produce an Initial Screening of Technologies document before the Remedial Investigation of NAVSTA TI has been completed. Modifications to this document maybe necessary after the Phase II RI.
1. Remedial technologies for site derived sediments were not presented in this document. Alternatives such as capping, stabilizing, and dredging of sediments should be included.
2. According to San Francisco Bay RWQCB Resolution 88-160, Regional Board Position on the Disposal of Extracted Groundwater from Groundwater Cleanup Projects, reclamation of groundwater is the primary alternative in terms of disposal of treated groundwater. Please include reuse options of treated groundwater in this text.
3. Remediation alternatives for PETN (explosives) in groundwater and soil were not discussed in this document, please include remedial alternatives for PETN in the IST. Refer to CAL-EPA RWQCB staff's comments on the Draft Phase I RI Report, Specific Comment No. 35.
4. For Chapter 1 and 2 of this document, please refer to CAL-EPA's comments on the Draft Phase I RI Report.
5. It is unclear whether any remedial alternatives were retained from the IST that remediate pesticides or PCB in groundwater or soil. Please clarify in the text.
6. Site 24 was a dry cleaning facility, remediation alternatives for related dry cleaning contaminants in groundwater (DNAPL) and soil should be discussed in this document.

SPECIFIC COMMENTS:

7. Page 1-8, Hydrogeology: The groundwater does not fit into the Class IIIB category from EPA's "Guidance on Remedial Actions for Contaminated Groundwater at Superfund Sites" (1988b). See CAL-EPA's comments on the Draft Phase I RI Report.
8. Page 2-8, 1st Paragraph: As recognized in this document, the Tri-Regional Board Staff Recommendations for Preliminary Evaluations and Investigation of Underground Storage Tanks is a TBC. If tanks are or were present on NAVSTA TI, then this document would be applicable to NAVSTA TI sites associated with USTs. Please elaborate on the statement "This staff recommendation document can be considered guidance and by definition, not applicable to NAVSTA TI."
9. Page 2-9, 2nd Paragraph: There is a misprint in the Tri-Regional Board Staff Recommendations for Preliminary Evaluations and Investigation of Underground Storage Tanks, the required detection limit is 10 ppm, not 1 ppm. Please modify text.
10. Page 3-36, Wetland Treatment: Please elaborate on why this option may not be viable at NAVSTA TI. Why would a large amount of land be required to implement this technique? Are the concentrations of metals in groundwater too high? Is the volume of groundwater too much?
11. Page 3-40, Disposal: Reuse of groundwater should be discussed in this section. See general comment 2.
12. Table 2: In the Phase I RI Report, pesticides were found at Site 24. Please modify table.
13. Table 5: Please refer to CAL-EPA's comments on the Draft Ecological Risk Assessment.
14. Table 9, 14: Please refer to CAL-EPA's comments on the Draft Phase I RI Report.
15. Table 13: The San Francisco Bay Basin Plan is an ARAR, please modify table.
16. Table 17: Please refer to CAL-EPA's comments on the Draft Phase I RI Report for additional RWQCB ARARs.