

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2  
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October 19, 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:

**COMMENTS TO DRAFT NAVY RESPONSES TO AGENCY COMMENTS ON THE DRAFT  
PHASE I REMEDIAL INVESTIGATION REPORT, NAVAL STATION TREASURE  
ISLAND (JULY 20, 1994)**

The Department of Toxic Substances Control and San Francisco Bay Regional Water Quality Control Board have reviewed the subject document. Both agencies have found that several issues need to be addressed further. Specific comments are enclosed.

If you have any questions regarding this letter, please contact me at (510) 540-3818.

Sincerely,

*Mary Rose Cassa*

Mary Rose Cassa  
Engineering Geologist  
Office of Military Facilities

Enclosure

cc: Mr. Michael Bessette  
California Regional Water Quality Control Board  
San Francisco Bay Region  
2101 Webster Street, Suite 500  
Oakland, California 94612

Ms. Rachel Simons [H-9-2]  
U. S. EPA, Region 9  
75 Hawthorne Street  
San Francisco, California 94105-3901

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DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
COMMENTS TO DRAFT NAVY RESPONSES TO AGENCY COMMENTS ON THE DRAFT  
PHASE I REMEDIAL INVESTIGATION REPORT, NAVAL STATION TREASURE  
ISLAND (JULY 20, 1994)

The responses provided by the Navy to the Department's review of the Baseline Human Health Risk Assessment incorporate nearly all recommendations and corrections. The few remaining issues are discussed below:

1. Page 36, item #1; Page 43, item #7: It is important to delineate the relative contributions of bridge paint chip-derived lead in soil and that deposited due to motor vehicle traffic at Yerba Buena Island. The Department recommends the Navy consult Appl. Occup. Environ. Hygiene 8(4): 217-220, 1993 and Environ. Sci. Tech. 4(3): 231-237, 1970 for an approach to discriminating between the two sources.
2. Page 36, item #2. Describe in detail or provide quantitative analyses to substantiate the endrin and related organochlorines present in samples. The possible "false positive" rationale is weak; perhaps a statistical approach to determine qualitative "outliers" would be useful in this regard.
3. Page 40, item #3: In the case of Naval Station Treasure Island, it is acceptable to use the U. S. EPA Region IX PRGs issued August 1, 1994 for site screening purposes, except for lead and polynuclear aromatic hydrocarbons (PAHs). For screening purposes, the Department has established that a concentration of inorganic lead less than 130 ppm in soil constitutes an acceptable human health risk. This value was obtained using the LEADSPREAD spreadsheet model (described in Chapter 7 of the Department's Supplemental Guidance for Human Health Multimedia Risk Assessment - Hazardous Waste Sites and Permitted Facilities, 1992) and conservative, screening level assumptions. If inorganic lead levels exceed 130 ppm in soil and exceed established background levels, then the Department's guidance should be used to calculate hazard. For PAHs, the Department can provide site-specific values.

The Navy is reminded that PRGs are not to be used to eliminate chemicals of potential concern from a risk assessment. In addition, PRG screening values may not be protective of potential ecological receptors or potential threats to ground water.

4. Page 43, item #6: While it may be appropriate to use surrogate compounds in addressing toxicity of weathered fuels, the Department recommends the Navy also consider a practical approach to free product recovery system design that has been developed by the U. S. EPA, Office of Research

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and Development, Risk Reduction Engineering laboratory, in cooperation with the American Petroleum Institute Soil and Groundwater Task Force. This information is contained in "Assessment, Control and Remediation of LNAPL Contaminated Sites," which can be obtained from Environmental Systems and Technologies, Inc., 2608 Sheffield Drive, Blacksburg, VA 24060-8270.

Additionally, to substantiate the Navy's position that use of U. S. EPA RfD values for NSTI petroleum products is inappropriate because "aged" or "weathered" fuels and related TPH are qualitatively different from fresh product, the Navy should provide a chromatographic scan of NSTI "weathered" product(s) and compare/contrast the scan(s) with similar scans for "fresh" gasoline, diesel fuel, etc.

5. Page 56, item #47: Suggest modification of the sentence to read, "exposure equations and factors for the inhalation of VOCs arising from soil gas . . ." to increase clarity.

The response provided by the Navy to the Department's review of the Ecological Risk Assessment includes incorporation of nearly all recommendations and corrections. The one remaining issue is discussed below:

6. Page 34, item #5: The response states document will not be revised because it is a secondary document, and alternative language is suggested. The justification for not changing the document in response to comment number 5 appears to conflict with the agreement to change the document based on comment number 2 (page 33). The Department suggests that the alternative language, which is acceptable, be included in an addendum to the final document.

Prepared By: Michael M. Bessette, RPM

Phone No.: (510) 286-1028

Date: September 13, 1994

File No.: 2169.6013 (MMB)

Subject: **RWQCB Comments on the July 20, 1994, Draft Navy Responses to Agency Comments on the Draft Phase I Remedial Investigation Report for Naval Station Treasure Island (NAVSTA TI).**

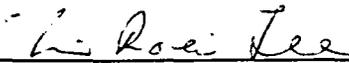
**General Comments:**

1. The Regional Water Quality Control Board (RWQCB) is concerned with the presentation of agency revisions and comments in the final Remedial Investigation document. Please clarify where the responses are to be positioned in the final document.

**Specific Comments:**

2. **Page 3, Response to Comment 5;** The Navy stated, "The beneficial uses of the groundwater at NAVSTA TI should include the beneficial uses of San Francisco Bay, to a limited degree, since not all of the groundwater will reach the Bay." Provide supporting data for this conclusion and explain how this will limit the beneficial use.
3. **Page 3, Response to Comment 5, second paragraph;** Please revise text to read, "If the TDS exceeds 3,000 milligrams per liter (mg/L), the RWQCB may consider the groundwater not to be a drinking water source."
4. **Page 68, Response to Comment 13;** The aquifer thickness with numerical values should be included in the discussion of hydrogeological aspects with respect to NAVSTA TI geology.
5. **Page 71, Response to Comments 28;** Please provide documentation for the statement "The incomplete combustion of PCBs is the only source of dioxins at fire training sites."
6. **Page 72, Response to Comment 31;** This response still does not explain the rationale for using cadmium concentrations to qualitatively determine the extent of contamination. Additionally, the QA/QC for these samples has not been documented.
7. **Page 73, Response to Comment 33;** The response does not specifically answer the question how many on-site observations were performed to document that no ecological receptors are present. Please provide a more elaborate explanation for this determination. Additionally, the existence of aquatic ecological receptors should be stated.
8. **Page 73, Response to Comment 34;** Again, the existence of aquatic ecological receptors should be stated.
9. **Page 75, Response to Comment 39;** Please note that the original comment is referring to the San Francisco Bay Basin Plan, 1992 Amendments with respect to surface water replenishment which states the human health AWQC for benzene is 21 ppb. This value is not based on groundwater as a drinking water source and should be noted in the text.
10. **Page 82, Response to Comment 9;** Please provide documentation or, preferable, field data to substantiate the statement that, "TI soil characteristics made it unlikely that a rich soil invertebrate community could be supported."
11. **Page 83, Response to Comment 13;** Addressing aquatic receptors in the soil section is appropriate as contaminated soil could impact groundwater, which then could impact the bay.

Concurred By:

  
Shin-Roei Lee, Section Leader