

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2

700 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737  
(510) 540-2122

November 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:

**COMMENTS TO DRAFT TECHNICAL MEMORANDUM: DRAFT PHASE IIB REMEDIAL INVESTIGATION WORK PLAN ADDENDUM, SITE 12, OLD BUNKER AREA, NAVAL STATION TREASURE ISLAND (SEPTEMBER 26, 1994)**

The Department of Toxic Substances Control (Department) and San Francisco Bay Regional Water Quality Control Board (Regional Board) have reviewed the subject document. The Department is concerned that the history of Site 12 may not have been adequately considered in developing the RI work plan. The Regional Board has concerns about placement of monitoring wells. Specific comments are enclosed.

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

Sincerely,

A handwritten signature in cursive script that reads "Mary Rose Cassa".

Mary Rose Cassa  
Engineering Geologist  
Office of Military Facilities

## Enclosures

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 IX  
75 Hawthorne Street  
San Francisco, California 94105-3901

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DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
COMMENTS TO DRAFT TECHNICAL MEMORANDUM: DRAFT PHASE IIB REMEDIAL  
INVESTIGATION WORK PLAN ADDENDUM, SITE 12, OLD BUNKER AREA, NAVAL  
STATION TREASURE ISLAND (SEPTEMBER 26, 1994)

1. Site 12 had a very complicated history, including ammunition bunkers, trash incineration and debris disposal, disposal of used sandblast grit, disposal of liquid waste containing short half-life radionuclides, and a landing strip. The work plan does not adequately discuss this history, based on information contained in previous documents, including the PA/SI (Dames and Moore, 1988) and engineering reports by McCreary-Koretsky Engineers (MKE) (1965), MKE-Abrams-Keller and Gannon (1968), and Lowry and Associates (1971). These reports describe or contain information about an incinerator (former Building 345), a "trash disposal trailer" that was located immediately north of housing unit 1235, and possible disposal of used sandblasting grit (location unknown). These activities may be related to elevated concentrations of petroleum hydrocarbons and metals in soil. The Navy should ensure that proposed sampling locations and analytes account for all these past activities.
2. In order adequately characterize the nature and extent of various types of contamination at Site 12, soil analysis should include dioxins.
3. The Department's RPM would like to inspect the 1968 MKE-Abrams-Keller and Gannon report.

Prepared By: Michael M. Bessette, RPM

Phone No.: (510) 286-1028

Date: November 1, 1994

File No.: 2169.6013 (MMB)

Subject: **RWQCB Comments on the September 26, 1994, Draft Phase IIB Remedial Investigation Work Plan Addendum, Site 12, Old Bunker Area, Naval Station Treasure Island (NAVSTA TI).**

**General Comments:**

1. The historical review of the former activities performed at Site 12 needs to discuss the origins of the incinerator ash as described in the trench logs (Dames and Moore 1988). Areas of observed incinerator ash should be sampled for the presence for dioxins.

**Specific Comments:**

2. **Page 2, 2.0, Second Paragraph;** Provide physical descriptions of the following; an ammunition bunker, a trench-type disposal unit, and a cell disposal unit. What was stored in the bunkers?
3. **Page 2, 2.0, Third Paragraph;** Provide documentation of the incinerator ash origin.
4. **Page 3, 2.0, First Paragraph;** Discuss the possible causes of the anomalies detected in the geophysical survey.
5. **Page 3, 2.0, Third Paragraph;** Described the uses of 3-nitrotoluene at NAVSTA TI.
6. **Page 6, 2.2, Third Paragraph;** Installation of groundwater monitoring wells downgradient of any plumes will require the determination of the groundwater gradient and the delineation of the respective plume. How will these be evaluated before the monitoring well installation? Data Evaluation should address this and, if possible, allow for agency review prior to well installation.
7. **Figure 1;** The legend should identify the solid black rectangular boxes and the unshaded circles. Provide a more accurate example of the old bunker sites delineation boundary in the legend. Any additional physical features from prior activities should be included.
8. **Figure 2;** Include the proposed locations of the groundwater monitoring wells and groundwater contour lines from previous sampling of 12-MW01 through 12-MW04.

Concurred By:



Shin-Roei Lee, Section Leader