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7 Feb 1995

From: Commander, Engineering Field Activity, West  
To: Distribution

Subj: REMEDIAL INVESTIGATION/FEASIBILITY STUDY FOR  
NAVAL STATION TREASURE ISLAND, SAN FRANCISCO

Encl: (1) Restoration Advisory Board Meeting Minutes - January 17, 1995

1. Enclosure (1) is provided for your review and comments. Please provide your comments on or before the next scheduled RAB meeting on February 28, 1995. The RAB meetings agenda will include the discussion and approval of the last meeting minutes.
2. Thank you for your guidance and involvement in this project. For further information, please call me at (415) 244-2560.

**ORIGINAL SIGNED BY**  
ERNESTO M. GALANG  
By direction

**Distribution:**

California Department of Toxic Substances Control (Attn: Ms. Mary Rose Cassa)  
California Regional Water Quality Control Board (Attn: Mr. Michael Bessette)  
California Department of Fish and Game (Attn: Dr. Michael Martin)  
US Environmental Protection Agency, Region IX (Attn: Ms. Rachel Simons)  
US Fish & Wildlife Services (Attn: Mr. Steve Schwarzbach)  
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NAVAL STATION TREASURE ISLAND, SAN FRANCISCO

Copy to:

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COMNAVBASE San Francisco (Attn: CDR Al Elkins)  
California Department of Toxic Substances Control (Attn: Ms. Shirley Buford)  
NAVSTA Treasure Island (Attn: Lt. Nannette Roberts)  
San Francisco Department Of Public Health ( Attn: Mr. Scott Nakamura)  
San Francisco Redevelopment Agency (Attn: Mr. Larry Florin)  
Treasure Island Citizens Reuse Committee (Attn: Ms. Laurie Glass)  
PRC Environmental Management, Inc. (Attn: Ms. Anne Ordng) (w/o encl)

Community RAB Members:

Mr. Joseph Alcedo	Ms: Carolyn Lown
Mr. James Aldrich	Mr. Daniel McDonald
Mr. Don Angus	Mr. David Moser
Mr. Saul Bloom (ARC Ecology)	Mr. Rick Nedell
Mr. Charles Boatman	Ms. Patricia Nelson
Mr. Richard Coxall	Mr. Henry Ongerth
Mr. Paul Hehn	Ms. Margaret Race
Ms. Martha Kohler	Ms. Patsy Reese
Mr. Denny Larson	Mr. Earl Rynerson
Ms. Audry Lee	Ms. Dale Smith
Mr. Clinton Loftman	Mr. Brad Wong

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**NAVAL STATION TREASURE ISLAND  
RESTORATION ADVISORY BOARD MEETING MINUTES**

**Casa De La Vista Meeting Center  
Tuesday, January 17, 1995**

On January 17, 1995, at 7:00 p.m., the Naval Station Treasure Island (NAVSTA TI) Restoration Advisory Board (RAB) met in the Casa De La Vista Meeting Center at NAVSTA TI. The purpose of the meeting was to (1) review the schedule for RAB review of upcoming environmental reports, (2) brief RAB members on the NAVSTA TI Federal Facility Site Remediation Agreement (FFSRA), (3) obtain RAB comments on the Base Realignment and Closure (BRAC) Cleanup Plan, and (4) obtain RAB comments on the Phase IIB remedial investigation work plan addendum. Handout materials as well as a list of attendees at the January 17 meeting are attached.

**I. WELCOMING REMARKS**

Mr. James Sullivan, the Navy BRAC Environmental Coordinator (BEC), opened the meeting, reviewed the meeting agenda, and inquired whether RAB members had any changes to the minutes from the December 6, 1994, RAB meeting. Several RAB members stated that they only received every other page of the minutes. Mr. Sullivan provided the full minutes to RAB members and comments on the minutes will be discussed at the next RAB meeting scheduled for February 28, 1995.

**II. NAVSTA TI RAB ORGANIZATION AND OPERATING PROCEDURES**

Mr. Sullivan noted that he has not received any comments on the draft RAB operating procedures. He will send the operating procedures to the RAB; approval of the procedures will be deferred to the next RAB meeting.

Mr. Sullivan announced that Mr. Don Angus has officially resigned as co-chair of the RAB due to illness. As a significant number of community RAB members were absent from the RAB meeting and Mr. Sullivan had yet to receive any nominations for the community co-chair position, members present agreed to postpone a vote on a new community co-chair until the next RAB meeting. Mr. Sullivan emphasized that the co-chair position is not expected to require an extraordinary amount of time; the key role of the community co-chair is to help lead the RAB meeting and present the views of the community.

Mr. Don Meyers suggested that the RAB consider use of an outside facilitator to help ease the burden of the co-chairs. Ms. Mary Rose Cassa suggested rotating the community co-chair responsibilities every few months.

At this point, Mr. Sullivan introduced Mr. Saul Levine, a member of the U.S. Army Presidio RAB. Mr. Levine pointed out that the Presidio RAB has both a community co-chair and an alternate community co-chair which has worked effectively, as well as a facilitator. The term of the community co-chair is six months.

### III. UPCOMING ENVIRONMENTAL REPORT REVIEW SCHEDULE

The schedule for RAB review of environmental documents was reviewed.

- The draft BRAC Cleanup Plan (BCP) was provided to RAB members on December 9, 1994; comments are due by January 17, 1995. Written comments have been received from RAB members; verbal comments will be received at tonight's meeting.
- The draft Phase II ecological risk assessment work plan was provided to RAB members on December 23, 1994; comments are due February 28, 1995.
- The draft final Phase IIB remedial investigation (RI) work plan addendum was provided to RAB members on January 3, 1995; comments are due on February 3, 1995.

Martha Kohler indicated that she had not received copies of the ecological risk assessment work plan or the Phase IIB RI work plan addendum; Mr. Sullivan will send her copies of the two documents.

### IV. FEDERAL FACILITY SITE REMEDIATION AGREEMENT (FFSRA) BRIEF

Mary Rose Cassa distributed a handout summarizing the FFSRA (attached) and presented a brief overview of the FFSRA. She made the following key points:

- The FFSRA for NAVSTA TI was signed in September 1992; it provides a roadmap to guide regulators and the Navy in implementing the installation restoration (IR) program at NAVSTA TI. It is a legally binding document. The FFSRA delineates the roles and responsibilities of the Navy, the California Department of Toxic Substances Control (DTSC), and the Regional Water Quality Control Board (RWQCB), and establishes cleanup schedules.
- At the time the FFSRA was signed, Phase II of the RI had not been initiated and therefore, the Phase II RI schedule presented in the FFSRA is not current.
- Modifying the FFSRA to update the Phase II RI schedule could potentially open the entire agreement for revision and, thus, protracted discussion on the agreement. She noted that Naval Air Station (NAS) Alameda has been attempting to reach consensus on its FFSRA for 1-1/2 years; however, new issues continually emerge to prevent signature of the agreement.
- The NAVSTA TI FFSRA was signed in 1992, prior to the decision to close NAVSTA TI. Therefore, unlike the NAS Alameda FFSRA, the NAVSTA TI FFSRA does not contain discussion on base closure issues.
- The FFSRA provides a key mechanism to ensure that the Navy and regulators jointly identify and resolve issues.

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- Section 7 of the FFSRA identifies primary and secondary documents that will be prepared during the IR process. She noted that most of the primary documents have been completed and all the new primary documents will be made available to RAB members for review. Although the BCP is not a primary or secondary document, it has been provided to the RAB for review and comment.

Brad Wong questioned why the FFSRA was signed in 1992 and was not revisited following the designation of NAVSTA TI as a BRAC site. Mr. Sullivan explained that within California, non-National Priority List (NPL) sites are subject to regulatory oversight by state regulators (versus NPL sites which are subject to federal EPA oversight). In 1990, the state of California established the concept of the FFSRA to provide the state a legal mechanism to exercise its authority and establish binding deadlines.

Sharon Tobias further explained that the FFSRA only applies to the IR program; the concept of the FFSRA was not developed to address issues outside of the IR program such as environmental compliance programs or property reuse issues.

Ms. Cassa also pointed out that Section 28 of the FFSRA addresses the transfer of base property; Section 28 describes how the Navy will inform the state when the Navy plans to lease or transfer base property.

Mr. Wong stated that by not opening up the FFSRA for revision, the RAB is expected to take a "leap of faith" that the FFSRA will provide effective protection to the NAVSTA TI community and that DTSC will provide effective oversight of the cleanup process. Mr. Wong raised several additional questions:

- What are the states' negotiation parameters; for example, can the state obtain waiver on federal cleanup standards?
- What is U.S. EPA's role?

Ms. Cassa first explained that President Clinton's Five-Point Plan for BRAC installations directs the EPA to participate as a member of the BRAC cleanup team (BCT) at each installation. Therefore, although EPA is not the lead regulatory agency at NAVSTA TI, it is a key player in the cleanup decision-making process.

She also noted that under the FFSRA, the federal agencies have agreed to abide by applicable state laws. Ms. Cassa emphasized that the FFSRA is available for review by the RAB and encouraged RAB members to review the document.

As a point of clarification, Ms. Tobias explained that the FFSRA is not being renegotiated; only the schedule is undergoing modification.

Joseph Alcedo inquired who is responsible for remediating lead paint contamination associated with the on-ramps to the Bay Bridge. Ms. Cassa explained that the Navy has the prerogative to seek

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assistance from other government agencies to remediate contamination that was not caused by the Navy. Mr. Sullivan further explained that the Navy plans to proceed with investigations of the on-ramps and address the issue of funding the investigation and potential remediation costs later.

In closing discussion on the FFSRA, Mr. Sullivan stated that he will provide copies of the FFSRA to all RAB members.

**V. BRAC CLEANUP PLAN COMMENTS**

Mr. Sullivan opened discussion on the BRAC Cleanup Plan (BCP) by emphasizing that, unlike the FFSRA, the BCP is not a legal document with binding deadlines; the BCP is only a guide to help the BCT address all environmental issues (e.g. IR program as well as compliance program issues).

Comments made by RAB members on the draft BCP are outlined below. Responses to the comments will be provided in writing at the RAB meeting scheduled for February 28, 1995.

- Martha Kohler:
  - Pages 3 - 9 discuss the paper waste incinerator; however, the document does not clarify whether the incinerator accepted other types of waste, how long it operated, and how the incinerator ash was handled. Mr. Sullivan explained that the incinerator accepted only paper waste.
  - The BCP should clarify that there have been three incinerators in operation at NAVSTA TI.
- Laurie Glass
  - Reference to the reuse goals established by the community in Chapter 1.1.3 should add the term "final."
  - Chapter 3.2.2 should identify reuse options for the aboveground storage tanks at the fire training school.
  - Chapter 3.2.12 discussion of the lead paint survey and abatement should identify sensitive receptors located within health buildings.
- Dale Smith:
  - The BCP contains many data gaps.
  - Because there is not yet a property reuse plan for NAVSTA TI, the BCT does not know what cleanup goals will be necessary to achieve; this makes it difficult to prioritize future monitoring and sampling plans.

- No schedule for lead assessment is identified in the BCP.
- Excavation of contaminated soils and off-site disposal would be cost prohibitive. Ms. Tobias responded that the Navy has no plans to excavate all the contaminated soil and dispose of it off-site. The Navy plans to have a treatment system on the base to remediate the soils.
- Brad Wong:
  - Issues and responsibilities associated with lead paint and asbestos abatement need to be further clarified and addressed.
- Don Meyers (ARC Ecology):
  - The limitations of the environmental baseline survey (EBS) should be explained.

Mr. Sullivan stated that the BCT will provide a written response to the RAB's comments on the BCP before the February 28, 1995, RAB meeting.

## VI. PHASE IIB REMEDIAL INVESTIGATION WORK PLAN ADDENDUM COMMENTS

Pat Nelson, Don Meyers, and Paul Hehn distributed a hand-out highlighting their comments on the Phase IIB RI work plan. Key verbal comments and preliminary responses are summarized below; the written comments are attached.

Comment: The overall cleanup goals are not conveyed clearly and the work plan addendum lacks a summary of previous RI data collected upon which the work plan addendum is based.

Response: As the document is an addendum, the overall goals and framework for the approach were not included.

Comment: The screening methodology proposed in the work plan addendum may not be the best sampling and analytical technique. How will the Navy distinguish between the saturated and unsaturated zone? The detection limits are also higher for immunoassay techniques.

Response: Ms. Tobias provided a preliminary response. The phase I RI data collected is usable for risk assessments. The majority of the data collected during phase IIB of the RI will not be used for risk assessment. A minimum of 20 percent of the samples collected will be sent to the laboratory for analysis to confirm results from the field screening analytical tests. Of the 20 percent, ten percent of the samples that indicated non-detect will be sent to the laboratory as will ten percent of the samples that indicated contaminants. Additionally, all surface soil samples which detected contaminants will be sent to the lab.

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Field screening analytical test kits are only applied at a portion of the sites. All monitoring well samples will be analyzed in the laboratory. Additionally, some analyses are not available in the test kits, so these samples will be sent automatically to the laboratories.

Mr. Sullivan pointed out that since all comments on the draft final Phase IIB RI work plan addendum are due in early February, a special working session to further discuss the work plan is scheduled for February 7, 1995, at 6:00 p.m. at PRC's offices, Suite 1800, 135 Main Street, San Francisco.

## **VII. NEXT RAB MEETING AND MEETING AGENDA**

The next RAB meeting will be held on Tuesday, February 28, 1995, at 7:00 p.m., at the Casa De La Vista, located on Naval Station Treasure Island, San Francisco, California.

Agenda items suggested for the next RAB meeting include the following:

- Present an overview of the EBS as well as findings of suitability to lease proposed for two buildings on NAVSTA TI.
- Present the BCT's response to comments on the BCP and Phase IIB RI work plan addendum.
- Receive comments on the draft Phase II ecological risk assessment work plan.

Mr. Meyers noted that the RAB needs to understand how final cleanup goals will be achieved. He also requested a list of all environmental activities not covered by the FFSRA or CERCLA requirements (e.g. petroleum and asbestos).

In response to a request from Mr. Wong, Mr. Sullivan will provide a list of addresses and phone numbers of NAVSTA TI RAB members at the next RAB meeting.

## **VIII. CLOSING REMARKS**

Ms. Glass, a member of the Citizens Reuse Committee (CRC), provided a brief update of CRC activities. She noted that the CRC and NAVSTA TI RAB jointly distribute their meeting minutes to members of both entities. The CRC is currently selecting a team of specialists to develop the NAVSTA TI reuse plan. She noted that Mr. Sullivan has been providing the CRC regular presentations on cleanup activities underway at NAVSTA TI. The next CRC meeting will be held on February 6, 4:00 p.m. at the San Francisco Redevelopment Commission board room at 770 Golden Gate Avenue, San Francisco. Amy Brownell announced that the draft reuse plan for Hunters Point Naval Shipyard will be presented on January 19, 1995, at 5:30 p.m. at the Southeast Community College, Oakdale Avenue, Bayview, San Francisco.

NAVAL STATION TREASURE ISLAND  
ENVIRONMENTAL RESTORATION ADVISORY BOARD MEETING  
17 JANUARY 1995  
7:00 P.M.  
CASA DE LA VISTA MEETING CENTER  
TREASURE ISLAND  
MEETING NO. 6

7:00 WELCOME REMARKS

DISCUSSION/APPROVAL OF AGENDA

APPROVAL OF MEETING MINUTES FROM 6 DEC 94

7:05 ORGANIZATIONAL BUSINESS

- FORMAL ADOPTION OF RAB OPERATING PROCEDURE GUIDELINES
- ELECTION OF COMMUNITY CO-CHAIR TO ONE-YEAR TERM

7:20 UPCOMING ENVIRONMENTAL REPORT REVIEW SCHEDULE

- DRAFT BRAC CLEANUP PLAN (BCP) - 9 DEC 94 (COMMENTS DUE TODAY)
- DRAFT PHASE II ECOLOGICAL RISK ASSESSMENT WORK PLAN  
- 23 DEC 94 (COMMENTS DUE 28 FEB)
- DRAFT PHASE IIB REMEDIAL INVESTIGATION DRAFT FINAL WORK PLAN  
- 3 JAN 95 (COMMENTS DUE 3 FEB)

7:25 FEDERAL FACILITY SITE REMEDIATION AGREEMENT (FFSRA) BRIEF

7:40 BRAC CLEANUP PLAN COMMENTS

8:00 BREAK

8:10 BRAC CLEANUP PLAN COMMENTS (CONT.)

8:35 PHASE IIB REMEDIAL INVESTIGATION COMMENTS

(TO BE CONT. IN FEBRUARY IF THERE IS A SPECIAL MEETING ON 7 FEB.)

9:00 OPEN QUESTIONS

9:15 AGENDA ITEMS FOR NEXT MEETING(S)

- ENVIRONMENTAL BASELINE SURVEY (EBS)

9:25 CLOSING REMARKS

9:30 END OF MEETING

NEXT REGULAR MEETINGS: 7:00 pm. Tuesday, 28 February 1995  
7:00 pm. Tuesday, 28 March 1995

THE 28 FEBRUARY MEETING WILL ALSO BE AT THE CASA DE LA VISTA

**Naval Station Treasure Island  
Federal Facility Site Remediation Agreement**

The following information is intended to provide the Naval Station Treasure Island Restoration Advisory Board with a working knowledge of the content and terms of the Federal Facility Site Remediation Agreement (FFSRA). The text is not a verbatim copy of the FFSRA and is not legally binding as presented here.

The NSTI FFSRA was signed by the Navy and the State of California on September 29, 1992. Since then, the schedule has been changed, and several changes have been made in the implementation of environmental cleanup at closing military bases (including the establishment of the Restoration Advisory Board). These changes are being addressed by the Navy and the State for incorporation into the FFSRA.

For further information, please contact Jim Sullivan or Mary Rose Cassa.

January 17, 1995

Federal Facility Site  
Remediation Agreement for  
Treasure Island Naval Station

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**Naval Station Treasure Island  
Federal Facility Site Remediation Agreement**

Purpose (Section 1)

To fully cooperate in accelerating and streamlining the remediation process at NSTI to the maximum extent possible consistent with applicable state and federal laws; to use consensus problem solving to achieve the primary goal of environmental restoration

General Purposes

- Ensure that the environmental impacts associated with past and present activities at NSTI are thoroughly investigated
- Ensure that appropriate remedial action is taken as necessary to protect the public health and welfare and the environment
- Establish a procedural framework and schedule for developing, implementing, and monitoring appropriate response actions in accordance with applicable state law and other applicable promulgated requirements, and consistent, to the maximum extent possible, with the priorities, guidelines, criteria, and regulations contained in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP)
- Facilitate cooperation, exchange of information, and participation of the parties (i.e., Navy and State of California)
- Ensure the adequate assessment of potential injury to natural resources, and the prompt notification of and cooperation with the federal and state Natural Resources Trustees necessary to guarantee the implementation of response actions achieving appropriate cleanup levels
- Recognize and reach compromise on perceived conflicts between State and Department of Defense response authorities under applicable state and federal law, and to preserve any rights or entitlements each party may have under applicable state and federal law

**Naval Station Treasure Island  
Federal Facility Site Remediation Agreement**

Specific Purposes

- Establish requirements for the performance of pre-remedial work and Remedial Investigation to determine fully the nature and extent of the threat to the public health or welfare or the environment caused by the release and threatened release of hazardous substances, wastes, pollutants, or contaminants at NSTI; establish requirements for the performance of a Feasibility Study for NSTI to identify, evaluate, and select alternatives for the appropriate remedial action(s) to prevent, mitigate, or abate the release or threatened release of hazardous substances, wastes, pollutants, or contaminants at NSTI in accordance with applicable state and federal law
- Identify the nature, objective, and schedule of response actions to be taken at NSTI
- Implement the selected remedial action(s) in accordance with applicable state and federal law
- Assure compliance with applicable state and federal hazardous waste and water quality laws and regulations
- Coordinate response actions with the mission, national security, and support activities at NSTI
- Expedite the cleanup process to the extent consistent with protection of human health and the environment
- Provide for indication, development, selection, and implementation by the Navy of response actions
- Provide for State oversight of and participation in the initiation, development, selection, and implementation of response actions, including the review of all applicable data as it becomes available and the development of studies, reports, and action plans; preserve the State's right to enforcement pursuant to applicable state and federal law
- Provide for operation and maintenance of any remedial action selected and implemented
- Identify operable unit alternatives which are appropriate at NSTI prior to the implementation of final remedial action(s)

Naval Station Treasure Island  
Federal Facility Site Remediation Agreement

Work to be Performed (Section 6)

- Remedial Investigation
- Feasibility Study
- Response action(s)
- Operation and maintenance of response action(s)
- Federal and state Natural Resource Trustee notification and coordination

**Naval Station Treasure Island  
Federal Facility Site Remediation Agreement**

Review and Approval (Section 7)

- Primary Documents: Within 60 days following receipt of comments on a draft primary document, the Navy will respond to the comments received and issue a draft final primary document subject to dispute resolution. The draft final primary document will become the final primary document either 30 days after the receipt by the State of a draft final document if dispute resolution is not invoked or as modified by decision of the dispute resolution process
  
- Secondary Documents: Although the Navy will respond to comments received, the draft secondary documents may be finalized in the context of the corresponding primary documents. A secondary document may be disputed at the time the corresponding draft final primary document is issued

**Naval Station Treasure Island  
Federal Facility Site Remediation Agreement**

Primary Documents (Section 7)

Preliminary Assessment/Site Investigation

Remedial Investigation/Feasibility Study Workplans

Quality Assurance Project Plans

Public Participation Plans/Community Relations Plans

Remedial Investigation Report

Feasibility Study Report(s)

Proposed Plans

Remedial Action Plans/Records of Decision

Remedial Designs

Remedial Action Work Plans

Health and Safety Plans

Naval Station Treasure Island  
Federal Facility Site Remediation Agreement

<u>Secondary Documents</u>	<u>Corresponding Primary Document</u>
Sampling and Data Results	RI
Removal Action Reports	RI
Baseline Risk Assessment	RI
Public Notices and Fact Sheets	FS/RD
Treatability Study	FS
Initial Screening of Alternatives	FS
Detailed Analysis of Alternatives	FS
Proposed Plan	RAP
Remedial Action Schedules	RAP
Health and Safety Plan	RD
Engineering Plans	RD
Post-Remedial Sampling Design Plan	RA
Post-Remedial Sampling Completion Report	RA
Action Memorandum	RI
Operations and Maintenance	RA
Implementation Schedules	RA

**From:** Treasure Island Restoration Advisory Board Community Members Pat Nelson, Donald Meyers and Paul Hehn

**To:** Treasure Island Restoration Advisory Board Community Members and Base Clean Up Team

**Subj:** Initial questions and comments arising from discussion of Phase IIB Remedial Investigation Work Plan Addendum.

1) Objective of Performing Additional Field Work.

Since the clean up goals do not seem well defined, it is unclear how the Phase IIB Work Plan, in its present form, contributes to the overall clean up and base property transfer objectives or how it is related to the Phase IIA work. In addition, the work plan does not appear to be based on a clear rationale derived from data already available. There should be greater emphasis on understanding the site as a whole rather than maximizing and generating additional details of individual study areas.

It is unclear whether the additional technical studies and eventual site clean up are driven by Risk Assessment: if so, the requirements that flow from this should be clearly defined.

2) Methodology. There appears to be a lack of justification and rationale for obtaining field screening data and an over reliance on the hydropunch and immunoassay techniques.

Given the depth to groundwater is reportedly two to eight feet below surface grade, it seems wasteful to use the hydropunch and immunoassay techniques when compared to soil borings and installing monitoring wells. Soil borings and monitoring wells completed via the use of auger drilling and continuous coring methods provide better quality soil and water samples and therefore more reliable data for these two media. The long-term benefits of high quality data should not be overlooked.

Has the possibility of evaluating the data from previous field investigations (e.g. geologic, hydrogeologic and analytical data) to form a basis for the IIB work been considered? If so, it is not apparent.

#### 4) Site History.

Has a concerted effort been made to extract as much information as possible from historical records as they relate to potential contamination resulting from historical operations on Yerba Buena and Treasure Islands?

For example, the sketchy history of Site 12 (Old Bunker Area) is sufficient to suggest that there is considerable potential for contamination, yet the described historic background is decidedly inadequate for mounting an efficient environmental investigation that will address the potential problems. The sampling proposed for this area does not reflect the potential for contamination that is indicated might exist from the current level of information provided.

As a further example, placement of monitoring wells for characterizing groundwater flow would benefit from an understanding of water flow (hydraulic gradient), historic research of tidal studies and the pre-construction conditions of the shoal on which Treasure Island is built. Historical records, earlier aerial photographs and a full evaluation of previous investigations at Treasure Island should help to fill in some of the gaps in this information.