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Ser 1832.5/L5140
7 Jun 1995

California Environmental Protection Agency
Department of Toxic Substances Control, Region 2
Attn: Ms. Mary Rose Cassa
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Subj: DEVIATIONS FROM FINAL PHASE IIB REMEDIAL INVESTIGATION (RI)
WORK PLAN ADDENDUM, NAVAL STATION, TREASURE ISLAND

Dear Ms. Cassa:

The Navy proposes the following deviations from the above- referenced document, which will affect the field investigation at Naval Station, Treasure Island (NAVSTA TI). These deviations are primarily based on comments and recommendations from the Base Realignment and Closure (BRAC) Cleanup Team (BCT)/remedial project managers (RPM).

1. Explosives Analysis at Site 12. Currently, analysis of explosives is planned for all Site 12 soils and groundwater samples that are sent to the off-site analytical laboratory. During the phase I remedial investigation, a low level of 3-nitrotoluene was detected in the groundwater sample collected from monitoring well 12-MW03. This constituent was not detected in the groundwater samples collected from any of the wells at this site during the November 1994 and February 1995 groundwater monitoring events. During the BCT/remedial project managers (RPM) meeting on April 17, 1995, recommendations were made to only analyze the samples nearest well 12-MW03 for explosives. The Navy recommends that the soil and groundwater samples collected near 12-MW03 (locations I, J, and K shown on Figure 5 of the work plan addendum) be analyzed for explosives.
2. Analysis for Hexavalent Chromium Speciation. Due to discussions held by the BCT/RPMs, The Navy recommends that two samples at three sites (sites 7, 10, and 11) be analyzed for hexavalent chromium. The purpose of this analysis is to provide evidence that the chromium levels present at NAVSTA TI are trivalent chromium and not hexavalent chromium, as there are no known sources of hexavalent chromium at NAVSTA TI. The California Department of Toxic Substances Control's policy for risk assessment states that unless analysis for hexavalent chromium is performed, all concentrations of chromium will be considered hexavalent chromium for the purpose of the risk assessment. The Navy and the BCT considers that sampling at three sites would be representative of the chromium speciation at NAVSTA TI. So if hexavalent chromium is not detected in the samples from these representative sites, the BCT would most likely agree that hexavalent chromium is not present on NAVSTA TI.

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3. Total Dissolved Solids. During the April 17, 1995 BCT/RPM meeting, a recommendation was made to analyze groundwater samples for total dissolved solids (TDS) at different depths to determine the depths of fresh water, the mixing zone, and bay water. During the sampling planned for Sites 21 and 24, groundwater samples are being collected at three depths (immediately below the water table, 20 feet, and at the interface with the bay mud). The Navy recommends that these samples be analyzed for TDS, as this information would be very useful for the groundwater modeling.

If you have any questions regarding these deviations, please call me at (415) 244-2560.

Sincerely,

original signed by:

ERNESTO M. GALANG
Remedial Project Manager
by direction of
the Commanding Officer

Copies to:

California Regional Water Quality Control Board (Attn: Mr. Michael Bessette)
California Department of Fish and Game (Attn: Dr. Michael Martin)
U.S. Environmental Protection Agency, Region IX (Attn: Ms. Rachel Simons)
U.S. Fish & Wildlife Services (Attn: Mr. Steve Schwarzbach)
Bay Area Air Quality Management District (Attn: Mr. Julian Elliot)
Bay Conservation and Development Commission (Attn: Mr. Steve McAdam)
National Oceanic & Atmospheric Administration (Attn: Ms. Denise Klimas)
NS Treasure Island (Attn: Mr. Jim Sullivan)
COMNAVBASE San Francisco (Attn: CDR Al Elkins)
San Francisco Department Of Public Health (Attn: Ms. Amy Brownell)
PRC Environmental Management, Inc. (Attn: Ms. Sharon Tobias)

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Community RAB Members:

Mr. Joseph Alcedo	Mr. Daniel McDonald
Mr. James Aldrich	Mr. David Moser
Mr. Saul Bloom (ARC Ecology)	Mr. Rick Nedell
Mr. Charles Boatman	Ms. Patricia Nelson
Ms. Laurie Glass (TI CRC)	Mr. Henry Ongerth
Mr. Paul Hehn	Ms. Patsy Reese
Ms. Martha Kohler	Ms. Dale Smith
Mr. Denny Larson	Mr. Brad Wong (Community Co-chair)
Mr. Clinton Loftman	

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