



DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY, WEST
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TREASURE ISLAND
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IN REPLY REFER TO :

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17 Sep 1996

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering Command
To: Distribution

Subj: REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) FOR
NAVAL STATION TREASURE ISLAND (NAVSTA TI)

Encl: (1) Navy's Response to Agency Comments on the Technical Memorandum:
Phase IIB Remedial Investigation Additional Characterization at Sites 12 and 17

1. Enclosure (1) is provided for your information. The U. S. Environmental Protection Agency (EPA) provided comments on August 28, 1996. Since the comments were not substantial, the sampling activities scheduled for the week of September 16, 1996 remain unchanged.
2. Thank you for your guidance and involvement in this project. For further information, please call me at (415) 244-2560.


ERNESTO M. GALANG
By direction of
the Commanding Officer

Distribution:

California Department of Toxic Substances Control (Attn: Mr. Chein Kao)
California Regional Water Quality Control Board (Attn: Ms. Gina Kathuria)
California Department of Fish and Game (Attn: Dr. Michael Martin) (w/o encl)
U.S. Environmental Protection Agency, Region IX (Attn: Ms. Rachel Simons)
U.S. Fish & Wildlife Services (Attn: Mr. Steve Schwarzbach) (w/o encl)
Bay Area Air Quality Management District (Attn: Mr. Julian Elliot)(w/o encl)
Bay Conservation and Development Commission (Attn: Mr. Steve McAdam)(w/o encl)
National Oceanic & Atmospheric Administration (Attn: Ms. Laurie Sullivan) (w/o encl)
NAVSTA Treasure Island (Attn: Mr. Jim Sullivan)
San Francisco Department of Public Health (Attn: Ms. Martha Walters)
PRC Environmental Management, Inc. (Attn: Ms. Sharon Tobias)(w/o encl)

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Subj: REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) FOR
NAVAL STATION TREASURE ISLAND (NAVSTA TI)

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**RESPONSE TO AGENCY COMMENTS ON
TECHNICAL MEMORANDUM: PHASE IIB REMEDIAL INVESTIGATION, ADDITIONAL
CHARACTERIZATION AT SITES 12 AND 17, NAVAL STATION TREASURE ISLAND,
DATED AUGUST 19, 1996**

This presents the Navy's response to comments from the regulatory agencies on the "Technical Memorandum: Phase IIB Remedial Investigation (RI), Additional Characterization at Sites 12 and 17" for Naval Station Treasure Island (NAVSTA TI), dated August 19, 1996. The comments addressed below, dated August 28, 1996, were received from the U.S. Environmental Protection Agency (EPA). The California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB), and the California Department of Toxic Substances Control (DTSC) did not comment on the technical memorandum.

1. **Comment:** Section 3.2 Additional Characterization of Site 17, page 5: It appears that groundwater sample 05-HP005, which detected chlorinated solvents, was collected from the top of the water table. Since chlorinated solvents tend to migrate downward, EPA recommends that deeper groundwater samples be collected at sample location 05-HP005 to determine if the contamination has migrated downward. Deeper groundwater samples should also be considered at sample location 05-HP003.

Response: The proposed Geoprobe boring approximately 15 feet south of sample location 05-HP005 (see Figure 2 in the technical memorandum) should adequately characterize chlorinated solvents in this area. A total of eight Geoprobe borings are proposed at the site. The locations of these borings can be adjusted to address EPA's concerns; however, the Navy believes additional borings are not necessary to determine appropriate well locations for Sites 5 and 17.

2. **Comment:** Section 3.2 Additional Characterization of Site 17, page 7, Laboratory Analysis: Although it is not explicitly stated, EPA assumes that all groundwater samples will be sent to a certified laboratory for VOC analysis. Please confirm.

Response: All groundwater samples will be sent to a certified laboratory for volatile organic compounds (VOC) analysis.

3. **Comment:** Section 3.2 Additional Characterization of Site 17, page 7, Monitoring Well Installation: Monitoring well 17-MW01 is screened from 3.5 to 13.5 feet. Since it is possible that the chlorinated solvents may have migrated deeper than 13.5 feet, monitoring well 17-MW01 may not be a good indicator for the extent of contamination. If the additional groundwater sampling shows that the chlorinated solvents have migrated deeper than 13.5 feet, a monitoring well screened deeper than 13.5 feet may have to be installed to define the downgradient edge of the plume.

Response: The Navy agrees with EPA's concern. The well locations and screened intervals will be selected based on the results of the Geoprobe soil and groundwater sampling. The proposed locations and screened intervals of the wells will be discussed with the NAVSTA TI Base Realignment and Closure (BRAC) Cleanup Team (BCT) prior to their installation. This is stated in the technical memorandum and should address EPA's concern.