

MEMORANDUM

To: Ernesto Galang, EFA-WEST Date: May 27, 1997
Jim Sullivan, NSTIBRAC Subject: Comments on the Naval
Fr: Patricia Nelson, NSTIRAB Station Treasure Island (NSTI)
Technical Subcommittee Remedial Investigation (RI)
Report Addenda No. 1 (Groundwater
Modeling) and No. 4
(Recommendations and Conclusions)

This memo transmits the comments on the technical adequacy of the subject NSTI RI Report Addenda as prepared by Pat Nelson, Co-Chair of the Community NSTIRAB. The comments are summarized in two parts: Addenda No. 1 and Addenda No. 4.

I. Addenda No. 1

There are two fatal flaws in the Contaminant Fate and Transport Modeling Report, Addenda No. 1. which are:

- 1) the use of the Seasonal Soil Compartment (SESOIL) model when it was determined it would not work for the unsaturated soils at Treasure Island because of its shallow groundwater, and
- 2) the assumption in the assessment that the only exposure to contaminants observed in groundwater at NSTI would be aquatic receptors. The contaminated groundwater should be considered a non-potable source of water for industrial or irrigation use, thereby creating an exposure pathway to humans on NSTI.

Please explain why an alternative model, such as VLEACH, was not employed for the purpose of this analysis. In addition, explain why the groundwater was not considered as a source of water for industrial or irrigation use.

II. Addenda No. 4

A. Overview

It is understood, from the RI Addenda No. 4 report, that the objectives of the work summarized therein were to revise the draft RI conclusions and recommendations for Installation Restoration (IR) Site Nos. 5, 7/10, 9, 11, 12, 17, 21 and 24. However, the technical bases for the revised conclusions and recommendations were described neither in a comprehensive nor a scientific manner but instead were written in a narrative style which was difficult to follow.

B. Specific Comments

1. There may be a relationship soil and groundwater contamination between adjacent IR site nos. 5, 17 and 24. However, for IR Site nos. 5 and 17 there are recommendations for no further action under CERCLA. These recommendations are irresponsible. Why not consider reviewing the data for all three sites and determine whether there is a relationship as part of the continuing work for IR site no. 24? If appropriate, why not consider combining all three IR sites and address them systemically with IR site nos. 4 and 19?

2. The revised conclusions and recommendations were based on data generated for the RI report and fate and transport modeling results which contain fatal flaws (refer to my comments on the RI dated January 17, 1997 and those above for Addenda No. 1). Therefore, it is recommended that the analytical data and fate and transport modeling analyses be reviewed for technical validity by regulatory agencies on the RAB and the Navy prior to decisions being made regarding whether no additional work under CERCLA for certain sites (e.g., IR site no. 5) is appropriate. In addition, it is recommended that analytical data for the IR sites that were transferred to the CAP program and are adjacent to IR sites for which additional work under CERCLA is recommended (e.g., IR site no. 6) be reconsidered as IR sites until valid data and fate and transport modeling work for NSTI are prepared.

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