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SSIC NO. 5090.3.A

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On behalf of the Treasure Island Development Authority (TIDA)

**Date:** 14 February 2014

**Project:** Treasure Island/Yerba Buena Island  
San Francisco, CA  
Project No. 731611601

**Subject:** Comments from Langan Treadwell Rollo/NGTS/TIDA on the Draft Work Plan Non-Time Critical Removal Action for Bigelow Court Solid Waste Disposal Area, Installation Restoration Site 12, Former Naval Station Treasure Island, San Francisco, California, dated January 2014

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## **Comments from Langan Treadwell Rollo/NGTS/TIDA**

### **General Comments**

1. When referencing the 1996 Reuse Plan—Public Review Draft (CCSF, 1996), please state that the document will also consider future reuse plans, including the 2011 Treasure Island / Yerba Buena Island Redevelopment Project Final EIR (CCSF, 2011). Please update proposed land use scenarios to residential and open space.
2. Please consider adding a section that addresses community considerations during construction. For example, Figure 5 shows a stockpile area adjacent to a community playground. What measures will be put in place to minimize impacts to the neighborhood?

### **Specific Comments**

1. **Section 1.0, third paragraph:** The statement “radiological contamination has not been detected at Bigelow Court” is not accurate. The same statement is made in Section 1.4. Radioactive material has been detected beneath the slab of Building 1101, so radioactive materials are a known (not just potential) concern at SWDA Bigelow Court.

It appears parts of the Work Plan were written prior to the radiological characterization of Buildings 1101 and 1103. Those sections should be updated accordingly.

2. **Section 1.4, Remedial Action Objectives, page 1-6:** The 2007 Action Memorandum/Interim Remedial Action Plan identifies dioxin as a COC at Site 12. Please include an action level for dioxins.
3. **Section 4.2:** Please clarify the scope of the planned gamma scans of the soil surfaces in SWDA Bigelow Court with respect to the already-planned excavations. Are the gamma scans described in Item 1 of Section 4.2 to be conducted for all of the open areas within SWDA Bigelow Court? What will be the bounds of those surveys if not?
4. **Section 4.3.3, Air Monitoring, page 4-11:** Please consider illustrating the proposed perimeter air monitoring stations on Figure 5. Please also review whether personal and perimeter air monitoring is required for PAHs and/or PCBs in addition to airborne dust and radiological air monitoring. What reporting will be required for dust and air monitoring?
5. **Section 4.6, Confirmation Sampling and Analysis, page 4-13:** Should step-out soil samples also be analyzed for dioxins?
6. **Section 4.6.1, Bottom Sampling, page 4-13:** Please clarify whether bottom soil samples will only be analyzed for lead, or if bottom samples will be analyzed for lead, PAHs, and PCBs (as described in Section 4.6).
7. **Section 5.2.1, Stockpiling, page 5-1:** Please clarify whether the waste soil/debris staging areas referred to in Section 5.2.1 are the stockpile areas 1 to 3 shown on Figure 5.
8. **Figure 8, Step-out Bottom Excavation Bigelow Court:** Please clarify whether a 4-point composite sample will be collected at each excavation bottom sub-grid. Section 4.6.1 states that one *discrete* soil sample will be collected from each sub-grid area.