

Arc Ecology

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Mr. Ernest Galang,
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900 Commodore Drive
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RE: Comments on Treasure Island Draft Final Remedial Investigation

Thank you for providing this opportunity to comment upon the Draft Final Onshore Remedial Investigation Report for Naval Station Treasure Island. I find, in general, the Draft Final RI Report to be much improved over the Draft version. I do have a few concerns, however, which I outline in this letter.

1. It appears that sites 5, 1/10, 8,9, and 17 were screened from further consideration in the FS because risks for the average exposure scenarios fell below the 10-6 (residential) cutoff. I believe these sites ought to be considered in the FS based on risks estimated under the reasonable maximum exposure scenario. Furthermore, sites 11 and 12 ought to be evaluated in the FS on the basis of human health, in addition to aquatic and terrestrial ecological risk.
2. Section 2.5.1.4 "Treasure Island Groundwater Quality and Beneficial Uses" refers to a "Pilot Beneficial Use Designation Project" report as being completed. My understanding is that this is a DRAFT Staff Report. It has not been widely distributed for public review and it has not been heard by the regional board. While the report may be interesting, it must not be used as a decision document unless and until it has been formally adopted by the RWQCB.
3. Page 3-8 states, "Based on the results of the field screening analysis, samples with both positive and negative results were selected for confirmation by the off-site analytical lab." It is not clear to me from the above statement how a sample was selected for laboratory confirmation.
4. According to Section 3.4.1.2 screen intervals on most monitoring wells were located to allow detection of floating, immiscible liquids, although compounds denser than water "can occasionally be detected." Where these compounds were detected in the upper portion of the aquifer, did the Navy go back and sample the lower portion of the aquifer?

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5. Page 3-21 suggests that field screening helped the Navy "to determine where potential contamination at a site is located." I would modify this sentence to reflect the limited types of contaminants that field screening was able to detect. For example the sentence might read, "immunoassay helped to determine the extent of TPH, PAH, PCB, and BTEX contamination at sites where it was used."

6. Page 4-5, Section 4.4: EPA recently issued draft guidance on soil contamination resulting from lead paint. Please include as a potential ARAR.

7. Page 7-22, Are chlorinated solvents found in groundwater at Site 5 the edge of a plume emanating from Site 17? It would be helpful if this question were answered in the text rather than referring the reader to another section.

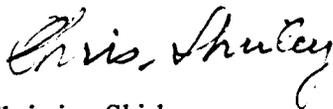
8. Navy seems to indicate that data which might prove the assertion that pesticides and paints were disposed of by pouring directly on the ground was not found at Site 7/10. It would be helpful if this were addressed directly. Were the reports inaccurate? Or did the compounds break-down, evaporate, disperse? Sink? Get covered with new soil? Could this disposal technique have been practiced elsewhere, nearby? For example, could the observed staining have been associated with the former AST operation and not the practice of dumping solvent and pesticide down holes in the ground?

9. Page 8-2, it is asserted that contamination related to sewage sludge spreading may have been removed during construction of the new treatment plant. Where might the contaminated soil have been disposed? On-base?

10. Page 10-22. I think it is adequate to say that the source for beryllium is unknown" and to delete the phrase "and is not expected to be associated with releases at the site." The latter phrase is pure speculation.

If you have any questions about these comments, please call me at 415-495-1786.

Sincerely,



Christine Shirley
Environmental Analyst

cc:
Admin Record (3 copies)