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March 19, 1999
Project 4850.01

Via Facsimile and U.S. Mail

Mr. Ernesto Galang
Engineering Field Activity, West
Naval Facilities Engineering Command
Bldg. 203, 2nd Floor
900 Commodore Drive
San Bruno, California 94066-2402

Subject: Draft Site 12 Corrective Action Plan for Time-Critical Removal of
Petroleum Hydrocarbon-Contaminated Soil
Naval Station Treasure Island
San Francisco, California

Dear Mr. Galang:

Geomatrix Consultants, Inc. has reviewed the subject report on behalf of the San Francisco Redevelopment Agency. The report presents a plan for remediation near Building 1311, where total petroleum hydrocarbons (TPH) in soil and groundwater exceed interim screening levels at Site 12 (447 milligrams per kilogram for soil and 1.4 milligrams per liter for groundwater). Soil excavation and off-site disposal is proposed to address soil; in situ biosparging and bioventing are proposed to address groundwater. The removal action is time-critical in order to meet the August 1, 1999, schedule for transfer of Site 12 to the City of San Francisco. Our general comments are presented below:

- The report proposes to excavate soil outside of the Building 1311 footprint. Investigations conducted to date indicate that TPH concentrations in soil above the screening level probably extend beneath Building 1311. The report needs to state how TPH concentrations in soil beneath Building 1311 will be addressed, assuming future redevelopment of this area with removal of Building 1311.
- The report states that design parameters for the groundwater remediation system will be based on results of a biosparging pilot test planned for April 1999. The report presents an implementation schedule, but the schedule does not include the biosparging pilot test. The schedule presented in the subject report should include the biosparging pilot test, since this is a task on the critical path for completing the design and installation of the groundwater remediation system for Site 12 by August 1, 1999.



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If you have any questions regarding these comments, please contact me at (415) 434-9400.

Sincerely yours,

GEOMATRIX CONSULTANTS, INC.

Carol Yamane, R.G.
Senior Hydrogeologist

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cc: Martha Walters, SFRA

- David Rist (DTSC)
- David Leland (RWQCB)
- James Ricks, Jr. (EPK)
- Jim Sullivan (Navy BEC)
- Richard Knapp (TEAM1)
- Don Marini (IT Corp)
- Paul Hehn (Co-chair)
- Nathan Brennan (Alt. Co-chair)
- Pat Nelson
- Dale Smith
- John Allman
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