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Secretary for  
Environmental  
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# California Regional Water Quality Control Board San Francisco Bay Region

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TREASURE ISLAND  
SSIC NO. 5090.3.A



Gray Davis  
Governor

June 8, 1999  
File: 2169.6013 (DFL)

Commanding Officer  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, CA 94066-2402  
Attention: Mr. Ernesto Galang

**Re: Comments on Draft Final Site 12 Corrective Action Plan for Time-Critical Removal of Petroleum Hydrocarbon-Contaminated Soil, Naval Station Treasure Island, San Francisco, California (dated June 7, 1999)**

Dear Mr. Galang:

Thank you for the opportunity to review the above-referenced document. Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) staff comments are presented below.

1. Section 3.0. This section should be updated with a figure showing results of the various Tetrtech and IT sampling efforts, proposed excavation areas, site logistics, and other information that may be useful in understanding the proposed action.
2. Section 3.2. Please provide references for the use of soil washing and in situ stabilization to treat petroleum-contaminated soils. References of EPA demonstration projects or the like would be especially helpful.
3. Section 3.2.1. The maximum concentrations and the estimated volumes appear to be based on an earlier understanding of the nature and extent of contamination
4. Section 3.3.1. Please describe the results of the demonstration of the ORC technology at NSTI. If results are not available, please describe the expected treatment effectiveness of the technology under conditions like those at NSTI. Representations regarding treatment effectiveness should be supported with literature references, vendor test results, or other material.
5. Section 4.0. The text should note that the RWQCB participated in the development of the cleanup goals.
6. The document should describe or reference the Navy's plan for verification sampling and post-remediation monitoring of groundwater.
7. Little detail is provided in this document on the specifics of the implementation of the action. This in part is the result of the incomplete status of the site characterization. However,

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additional detail on field applications and treatment effectiveness of the proposed oxidation technologies, which are relatively new to the field, should be included in this document.

As noted at the BCT meeting of June 7, 1999, this document has been reviewed on an expedited schedule at the Navy's request. The RWQCB reserves the right to comment further on the document. We would expect to have any additional comments to you on or before August 15, 1999.

If you have any questions regarding these comments, please call me at 510-622-2377.

Sincerely,



David F. Leland, P.E.  
Groundwater Protection and Waste  
Containment Division

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Attachment

cc: Mr. James A. Ricks, Jr. (SFD-8-2)  
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