Department of Toxic Substances Control

Edwin F. Lowry, Director
700 Heinz Avenue, Bldg. F, Suite 200
Berkeley, California 94710-2721

Winston H. Hickox
Secretary for
Environmental
Protection

Gray Davis
Governor

June 10, 1999

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

DRAFT FINAL SITE 12 REMOVAL CORRECTIVE ACTION PLAN FOR TIME-CRITICAL REMOVAL OF PETROLEUM HYDROCARBON-CONTAMINATED SOIL AND GROUNDWATER REMEDIATION, NAVAL STATION TREASURE ISLAND

Dear Mr. Galang:

The Department of Toxic Substances Control (DTSC) has reviewed the Site 12 Corrective Action Plan for Time-Critical Removal of Petroleum Hydrocarbon-Contaminated Soil and Groundwater Contamination near Building 1311 in the residential housing area at the northern end of Treasure Island. DTSC has the following comments:

General Comments

1. Please briefly discuss how this Corrective Action Plan (CAP) will fit into the overall Site 12 remedial process. Specifically, identify the decision document that the CAP will eventually be referenced in to document that all necessary remedial actions have been completed.

Specific Comments

2. Page 4, Section 2.3, Contaminant Characteristics

This section indicates that interim cleanup goals were determined by the Navy, DTSC, and the City of San Francisco. Please add the Regional Water Quality Control Board (RWQCB) to the list of agencies involved in

determining the cleanup goals.

Also, will these cleanup goals be applied to all sites on Naval Station Treasure Island (NSTI) or are they Site 12 specific?

3. Page 6, Section 3.1.1, Soil Excavation

This section indicates that before backfilling oxygen releasing compounds (ORC) will be placed in a slurry form at the bottom of the excavation to remediate TPH contamination below 10,000 mg/kg. Why 10,000 mk/kg and not 8,800 or 1,300 mk/kg? Please also state to what levels the ORC is capable of reducing the TPH.

Also, please define "inaccessible soil" and describe how it will be treated using chemical oxidation.

4. Page 7, Section 3.1.2 Chemical Oxidation Treatment of Soil and Groundwater

Is it anticipated that the proposed remedial approach will address soil contamination left in place beneath infrastructure (i.e., buildings, roads, utility lines)? If so, how will the Navy verify this? If not, how will the residual contamination be addressed?

5. Page 8, Section 3.2 and 3.3, Other Alternatives - Soil and Groundwater

The analysis on each of the alternatives presented is inadequate and needs to be substantiated. DTSC does not believe that by stating that technologies are expensive and only used to treat large volumes of soil that this is sufficient to omit them as possible alternatives. An expanded discussion and a cost analysis for each of the listed alternatives needs to be provided. Even though a total volume of soil to be excavated and treated is not yet known, a per unit cost of the preferred alternative and the other alternatives is possible. These per unit costs could then be used to calculate a total cost once the volumes to be excavated and treated are known.

Therefore, please provide an expanded discussion on the alternatives and complete cost analysis for the preferred alternative and other alternatives for both soil and groundwater on a per unit cost basis (i.e., per cubic yard

of soil excavated/treated) and include it in the next revision of the CAP.

6. Section 3.2.1, Soil Washing

DTSC believes that the range of TPH concentrations at Site 12 exceeded 12,550 mg/kg. Please clarify.

If you have any questions regarding this letter, please contact me at (510) 540-3769.

Sincerely,

David Rist

David Rist
Hazardous Substances Scientist
Office of Military Facilities

cc: See next page.

cc: Mr. David Leland
San Francisco Bay
California Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Mr. James Ricks Jr.(SFD-8-2)
U. S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105

Ms. Martha Walters
San Francisco Redevelopment Agency
770 Golden Gate Avenue
San Francisco, California 94102

Mr. Jame Sullivan
Caretaker Site Office
Treasure Island
410 Palm Ave., Room 161
San Francisco, California 94130-0410

Paul Hehn
Nathan Brennan
Pat Nelson
Dale Smith
John Gregson
ARC Ecology
} RAB

Jerry Wickham (TtEMI)
Carol Yamane (Geomatrix)
John Baur (IT Group)
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