

# Department of Toxic Substances Control

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TREASURE ISLAND  
SSIC NO. 5090.3.A



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

Gray Davis  
Governor

Winston H. Hickox  
Secretary for  
Environmental  
Protection

October 12, 1999

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

**NAVY DOCUMENT ENTITLED "DRAFT SITE 12 REMOVAL SITE  
EVALUATION AND ACTION MEMORANDUM FOR TIME CRITICAL  
REMOVAL OF LEAD CONTAMINATED SOIL NEAR BUILDING 1133;  
NAVAL STATION TREASURE ISLAND" DATED OCTOBER 1, 1999,  
AND ASSOCIATED DRAFT PUBLIC NOTICE DOCUMENT**

Dear Mr. Galang:

We have reviewed the above referenced documents and offer comments as noted below. We are aware that the actions discussed in the documents have already taken place, and our comments reflect that fact.

- 1) The Department did not approve nor concur with the action described in the referenced documents. DTSC understood that, at the time that the Navy took this decision, the Navy believed that this action was consistent with the Federal Facility Site Remediation Agreement (FFSRA) as either an emergency or a time critical removal. DTSC did not and does not concur with that assessment. Further, DTSC did not agree that further investigation or remedial action would not be required after the excavation was completed. We were clear that, prior to final "closeout" of the Building 1133 area, the Navy would need to demonstrate that any remedy is in fact final pursuant to the National Contingency Plan. Finally, DTSC noted that if waste was to remain in place, then institutional controls would be required.

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- 2) Based on our field observations of work as it was being conducted, we believe that uncharacterized waste remains in place, below four feet in the immediate area of the excavation, at the surface beyond the excavation toward the sea wall, and immediately under the foundation and slab of Building 1133. It is also possible that waste remains in place at other locations in the vicinity of the excavation. All such residual waste represents a potential threat to public health and the environment. Further investigation is clearly required, to include characterization of the waste materials and contaminants left in place, and evaluation of risks to public health and the environment associated with those waste materials and contaminants.
- 3) Since waste remains in place and has not yet been characterized, there remains a likelihood that additional removal or other remedial actions will be required.

The information noted above is critical to closeout of this site, and is of likely interest to nearby residents and the public at large. As such, it must be reflected in both the action memorandum and the public notice.

Please include this letter in the public and administrative records for Naval Station Treasure Island. If you have any questions, please contact me at (510) 540-3772.

Sincerely,



Daniel E. Murphy, P.E., Chief  
Berkeley Unit  
Office of Military Facilities

cc: See next page.

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cc: Mr. Chris Maxwell  
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. James Sullivan  
Caretaker Site Office  
Treasure Island  
410 Palm Ave., Room 161  
San Francisco, California 94130-0410

Carol Yamane (Geomatics)

John Baur (IT Group)

Anju Wicke (T&EM)

Paul Hehn

Nathan Brennan

Pat Nelson

Dale Smith

ARC Ecology

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