

Landers, La Rae N. CIV (NFECWS)

From: Sarah Raker [slr@rb2.swrcb.ca.gov]
Sent: Friday, March 12, 2004 5:03 PM
To: Landers, La Rae N. CIV (NFECWS)
Cc: drist@dtsc.ca.gov; collins.patti@epa.gov; Sullivan, James B CIV BRAC, (EFDSW);
marcie.rash@ttemi.com; ROSEC@ttemi.com
Subject: Draft comments to Site 27 FS

Here are my preliminary comments. See you on Tuesday at 3pm at the Casa to discuss these.
Sarah

PRELIMINARY DRAFT

Subject: Comments on Draft Feasibility Study, Site 27, Naval Station Treasure Island,
San Francisco, California

General Comments:

1. The description of the site boundary is unclear.
2. The ARARs are not consistent with the proposed remedial alternatives.
3. The cost for alternative 3 appears greatly exaggerated compared with costs associated with other dredge projects proposed to the Water Board.

Section 1 Introduction

1. Please add "Site 27" to title of report.
2. Please be consistent with terminology throughout the document. Examples of multiple terms are Clipper Cove, Clipper Cove Skeet Range, Skeet Range, and Site 27 and Offshore OU and Offshore sediment OU. The boundaries for Site 27 and the skeet range are confusing. See comments to Sections 1.2.1 and 1.2.2 below.
3. Please expand the 2nd paragraph to describe the off shore operable unit, including the extent of Site 13 and Site 27. As described in the RI, the Off-shore Operable Unit consists of the stormwater outfall areas (Site 13) and the Clipper Cove Skeet Range (Site 27). Please explain the status of Site 13 with respect to the RI, proposed plan, and proposed property transfer. Similarly, explain the status of Site 27 as needing a separate FS to evaluate the potential risk to diving ducks from future dredging and the proposed reuse of the marina.

Section 1.1. Purpose and Organization - Need to fix 2nd paragraph

4. Please revise the last sentence in the 2nd paragraph to more clearly state the need for the FS.

The current statement: "Due to the reuse by the City of San Francisco to dredge the area for use as a marina, the potential for disturbance of lead shot exists, institutional controls over future dredging actions are necessary for IR Site 27, the Clipper Cove Skeet Range." However, institutional controls are only one of the proposed alternatives.

Recommended revised text: "The City of San Francisco has proposed to dredge the sediment to develop the marina in Clipper Cove. Dredging will disturb the lead shot that is currently buried in the sediment. A remedial action is needed to protect future diving ducks from exposure to redistributed lead shot."

5. In the 3rd paragraph, the text states: "The majority and highest concentration of lead shot*" Please specify lead shot count or lead fraction vs lead concentrations in sediment. The remainder of the document deals with lead shot, not lead concentrations in sediment.

Section 1.2 Background Information

6. The first sentence is confusing. Recommended revised text: "The following section describes the background, physical setting, history, and screening criteria used to characterize the ECOLOGY of the Clipper Cove Skeet Range."

Section 1.2.1 Location and History

7. 1st paragraph and Figure 3- What's the basis for the skeet range boundary? Why is it not the same as the investigation boundary? Please clarify.

Section 1.2.2 Clipper Cove Skeet Range Description and History

8. Please clarify the site boundary. The text states: "Based on this approach, the site boundary was set at 900 feet." What site? Site 27? But that is not the same as the 900 feet boundary. Please clarify.

Section 1.2.3 Sediment Deposition in Clipper Cove

9. 3rd paragraph: What does sediment outlay classification mean? Please clarify.

Section 1.3 Previous Offshore Investigation

10. The provisions of the Water Board Order have not been satisfied. Recommended revised text:

The RI conducted at Site 27 met Tasks B.2-a through B.2-d of the Order. This FS is proposed to address Tasks B.2-e and B.2-f of the Order. Once a remedial action is implemented, the Navy will have met all the provisions of the Order.

11. In the 2nd paragraph, the text states that Phase I and II RI sampling did not include areas directly inside the skeet range. Which boundary? Site 27 or the 900-foot boundary or both? Please clarify the sampling in relation to the boundary. The text also states that sediment samples collected around the area helped delineate the nature and extent of lead and PAH at the skeet range. Please clarify that the samples outside the boundary helped to delineate the boundary of the site.

Section 1.4 Ecological Characterization at Clipper Cove Skeet Range

12. Recommended revised text:

The following sections summarize the results of the ERA that was conducted as part of the RI for the Offshore OU, including the Clipper Cove Skeet Range.

Section 1.4.1 Screening Criteria

13. I agree with the approach presented for the ER-Ls and ER-Ms. Please note: Although NOAA published the original work produced by Long and Morgan in 1991, NOAA is not the primary author. NOAA would prefer you use the citation for Long and Morgan 1991.

14. Last paragraph: Why include reference to selenium, chlordane, and dieldrin? These are not COC at the skeet range.

Section 1.4.2 Sediment Core Samples

15. Please add a figure with core sample locations to accompany Figure 5. Please check the typos in Figure 5: Longard others 1995 should be Long AND others 1995; and RWQCB 1956 should be 1996(?)

16. What is the rationale for the assumption that individual lead shot weight is 0.065 grams? Please provide a reference.

Sections 1.4.3 Exposure Routes And Receptors Of Concern and 1.4.4 Risk Assessment Conclusions

17. Section 1.4.3 describes both the exposure route, receptors and risk assessment conclusions for sediment. But it does not discuss lead shot. Section 1.4.4 does not discuss the risk assessment conclusions for sediment. Suggest revising Sections 1.4.3 and 1.4.4 as follows:

• Section 1.4.3 Exposure Routes And Receptors Of Concern - Discuss exposure route and receptors for sediment and for lead shot.

• Section 1.4.4 Risk Assessment Conclusions - Discuss the conclusions of the risk assessment for lead in sediment and the risk to diving ducks from lead shot.

18. Please check use of the term "lead shot concentration". Recommend lead shot count or lead shot fraction to avoid confusing lead sediment concentrations with lead shot concentrations.

Section 2.1 Remedial Action Objectives

19. In the 1st paragraph, please revise the last two sentences as follows:

"An unacceptable ecological risk is possible if lead shot IS brought to or exposed at the surface where it could*."

This FS is being prepared to address regulatory agency concerns about potential future RISK TO ECOLOGICAL RECEPTORS FROM EXPOSURE TO LEAD SHOT due to dredging.

Section 2.2 Applicable or Relevant and Appropriate Requirements (ARARs)

20. Please clarify the purpose of the ARARs. Are these ARARs for lead shot contamination or for conducting remedial alternatives to address lead shot contamination?

21. Please clarify the status of the ARARs. Are these potential ARARs, proposed ARARs or just ARARs once the final FS is issued? Please be consistent throughout the document.

Section 2.2. 2 Location-Specific ARARs

22. Please add the Clean Water Act Section 401. Section 404 triggers Section 401. The Federal Clean Water Act, in Section 401, specifies that states must certify that any activity subject to a permit issued by a federal agency, such as the Corps, meets all state water quality standards. In California, the State Board and the regional boards are responsible for taking certification actions for activities subject to any permit issued by the Corps pursuant to Section 404 (or for any other Corps' permit, such as permits issued pursuant to Section 10 of the Rivers and Harbors Act of 1899).

Section 2.2. 3 Action-Specific ARARs

23. Please clarify the assumptions about the sediment waste disposal. As stated in the 2nd paragraph "The only potential ARARs for dredging of sediments are RCRA hazardous waste and land disposal restrictions". But later the Navy assumes the waste is not hazardous and will meet Class II disposal requirements. If it's not hazardous then it will meet Water Board Title 27 'designated waste' requirements. If the waste is hazardous and needs to be disposed of at a Class I landfill, then RCRA would apply.

24. In Section 2.4.3.3 Off-Site Disposal, the text states the sediment is not expected to contain contaminant concentrations exceeding RCRA levels. It's confusing why the RCRA hazardous waste ARARs are included if the disposal is assumed to be non-hazardous. Later in the report in Section 3.1.3.2, the text states: "Although the sediments do not exceed the RCRA criteria defining hazardous, these ARARs will be used as guidelines for on-site storage and dewatering activities." It seems the RCRA requirements either are or are not ARARs. Please clarify the text.

Section 2.3.2 Institutional Controls

25. Water Board defers to DTSC for legal issues and definitions for institutional controls.

Section 2.4.3 Sediment Removal

26. What's the rationale for the dimensions of the sediment to be removed? The lead shot was only sampled to a maximum depth of 5 feet but it's assumed the lead shot will be at 7 feet. Please show the assumed dimensions on Figure 7.

27. The assumption that all the sediment will require disposal at a Class I or II

facility should be further evaluated. The Water Board promotes projects that reuses the dredge spoils when possible. Did the Navy evaluate the cost of removing the lead shot from the dredged material before disposing it as non-hazardous waste?

Section 2.4.3.3 Off-Site Disposal

28. Please provide rationale for why the sediment is not expected to contain contaminant concentrations exceeding RCRA levels. A sample containing lead shot will trigger hazardous waste disposal.

Section 3.1.3.7 Cost for Alternative 3

29. \$13M is considerably higher than costs associated with dredging projects of similar size and magnitude. Let's discuss the assumptions that are driving these costs.

Section 3.2.3 Long-Term Effectiveness and Permanence

30. Please be consistent with the evaluation of long-term effectiveness. In the 1st paragraph, the statement "Furthermore, an effective sediment barrier would remain at the site under Alternative 2 and exposure routes to ecological receptors would be non-existent" is misleading. This is also true for Alternative 1 yet the primary assumption in the FS is that potential future dredging would disturb the existing sediment cover.

31. I disagree with the statement "Alternative 3 would be slightly more effective and permanent than Alternative 2". If Alternative 2 places institutional controls on future property owners that will require compliance with the Clean Water Act Section 404/401, then the outcome is the same as Alternative 3. Are you assuming Alternative 2 will not be implemented effectively and that is why Alternative 3 is given a slightly higher rating?

If you have questions, please feel free to contact me by telephone at (510) 622-2377 or by electronic mail at slr@rb2.swrcb.ca.gov.

Sincerely,

Sarah L. Raker, R.G., C.HG.
Engineering Geologist

cc: Mr. David Rist, Department of Toxic Substances Control
Ms. Patti Collins, U.S. Environmental Protection Agency
Mr. Stephen Proud, Treasure Island Development Authority
Mr. Phil Burke, CH2MHill
Mr. Gary R. Foote, Geomatrix Consultants, Inc.

Site 27 Draft FS