



Alan C. Lloyd, Ph.D.  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

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700 Heinz Avenue, Suite 200  
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TREASURE ISLAND  
SSIC NO. 5090.3.A



Arnold Schwarzenegger  
Governor

November 1, 2005

Mr. Scott Anderson  
Remedial Project Manager  
Department of the Navy  
Base Realignment and Closure  
Program Management Office West  
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San Diego, California 92108-4310

APPROVAL OF NO FURTHER ACTION FOR SITE 07 (FORMER PESTICIDE  
STORAGE AREA), NAVAL STATION TREASURE ISLAND,  
SAN FRANCISCO, CALIFORNIA

Dear Mr. Anderson:

The Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB), (collectively, the State) have completed its review of the Navy's letter report, dated October 3, 2005, requesting a No Further Action (NFA) decision and site closure for Installation Restoration Site 07, Pesticide Storage Area, located at Naval Station Treasure Island, San Francisco, California.

Based on information provided by the Navy, DTSC understands that from about 1955 until the early 1960s, pesticides and chlorinated herbicides were mixed and prepared for use in the northern portion of Building 62. Additionally, lead-based paint was reportedly mixed with linseed oil on the property. It was also reported that excess pesticide and paint fluids may have been disposed of by pouring them directly onto the ground, and between 1968 and 1976. Sludge from the adjacent wastewater treatment plant (WWTP) was spread on the ground in an area measuring about 250 feet by 100 feet adjacent to Building 62. Potential contaminants in the sludge were expected to be similar to contaminants in the discharge from the WWTP; which included arsenic, cadmium, chromium, copper, cyanide, lead, mercury, nickel, silver, zinc, and phenol compounds.

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To investigate the possibility of past releases, three investigations of soil and groundwater at Site 07 were conducted between 1991 and 2001. To account for past operations, all samples were analyzed for volatile organic compounds, semi-volatile organic compounds, metals, chlorinated pesticides, polychlorinated biphenyls (PCBs), and chlorinated herbicides. As a result of the investigation in 1991, only one soil sample from the former sludge disposal area adjacent to Building 62 reported a concentration of 2-(2-methyl-4chlorophenoxy)-propionic acid greater than the screening criteria; however, subsequent investigations did not result in any detections of chlorinated herbicides above screening criteria.

In 2001, the Navy conducted a supplemental investigation in which twenty-eight surface soil samples were collected under the pesticide and paint storage area at the north end of Building 62. In addition, four soil borings were advanced along the western side of the building to assess whether the past spreading of sludge from the WWTP resulted in a release to the environment. All soil samples were again analyzed for polycyclic aromatic hydrocarbons, chlorinated and non-chlorinated pesticides, chlorinated herbicides, PCBs and metals.

Results of sampling conducted for the supplemental inspection indicated four pesticides (4,4'-dichlorodiphenyltrichloroethane [DDT], alpha-chlorodane, gamma-chlorodane, and dieldrin) were detected in surface soil beneath Building 62 at concentrations slightly above screening criteria. Based on these results, the Navy concluded that the low concentrations of pesticides, which were not contiguous, were not indicative of a release or a spill, but instead appeared to be associated with application of pesticides during construction or subsequent routine application of pesticides at the site. The subsurface investigation along the western portion of Building 62 did not identify any visual evidence of sludge material in the soil cores and analytical results indicated that all concentrations were below site screening criteria.

Based on our review of past investigations and pertinent information submitted in the Navy's letter report requesting site closure, the State has determined that the former pesticide storage and sludge drying area located in and adjacent to Building 62 on Parcel T113, and designated as Installation Restoration Site 07, does not require further response actions with regards to hazardous substances and petroleum products, and the property is suitable for unrestricted use. DTSC, as the lead regulatory agency, makes this determination pursuant to the California Health and Safety Code, Division 20, Chapter 6.8.

Please be advised that this NFA determination is based on existing information available to DTSC at this time. In the event that new information indicating environmental concerns is identified, DTSC reserves the right to require additional investigation and possible remediation as the situation warrants.

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The State understands this site will be included in a larger parcel transfer to the City of San Francisco for non-residential land use, with options including institutional and community uses. Please be advised that should this property be considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with California Education Code 17210 et. Seq, will need to be conducted and approved by DTSC.

DTSC also understands that Site 07 will be included in the Finding of Suitability for Early Transfer that will include Parcel T113 and subsequent DTSC certification.

If you have any questions regarding this letter, please contact Mr. David Rist, of my staff, at (510) 540-3763.

Sincerely,



Anthony J. Landis, P.E.  
Chief  
Northern California Operations  
Office of Military Facilities

Enclosure

cc: Mr. Gary R. Foote  
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cc: Ms. Patti Collins (SFD-8-2)  
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Mr. David Rist  
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Enclosure 1

Documents Reviewed for Approval of No Further Action for Site 07 on Parcel T113

Draft Final Onshore Remedial Investigation Report, Naval Station Treasure Island, San Francisco, California. PRC 1997

Final Field Activity Report Environmental Baseline Survey Data Gaps Investigation, Naval Station Treasure Island, San Francisco, California. Shaw Environmental and Infrastructure, Inc. (Shaw) 2005

Final Closure Report, Site 14/22 Request for No Further Action, Naval Station Treasure Island, San Francisco, California. Shaw 2005

Final Corrective Action Plan, Sites 06, 14/22, 15, and 25, Naval Station Treasure Island, San Francisco, California. Tetra Tech EM Inc. (Tetra Tech) 2002

Supplemental Site Inspection Report, Installation Restoration Site 07, Naval Station Treasure Island, San Francisco, California. Tetra Tech 2002

Final Remedial Investigation Report for Installation Restoration Sites 09 and 10, Naval Station Treasure Island, San Francisco, California. SulTech 2005