



# California Regional Water Quality Control Board

## San Francisco Bay Region



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TREASURE ISLAND  
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File No. 2169.6013 (AF)

U.S. Department of the Navy  
Attn: Mr. Jim Whitcomb  
BRAC Program Management Office - West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310

**SUBJECT:** Water Board comments on Draft Revised Engineering Evaluation and Cost Analysis Solid Waste Disposal Areas, Installation Restoration Site 12, Old Bunker Storage Area, Naval Station Treasure Island, San Francisco, dated June 12, 2006

Dear Mr. Whitcomb:

Upon review of the subject report, I have the following comments:

General Comments:

1. The remedial action objective stated throughout the report refers only to restricting the potential for direct contact of residents to contamination in soil. However, there is also the potential for utility workers to encounter contaminated soil or solid waste while installing or servicing underground utilities. This is discussed in *Section 2.4.5.1 Potential Receptors* and in *Section 2.4.5.2 Exposure Pathways*. For consistency, when stating remedial action objectives, please also address the potential risk to utility workers.
2. Throughout the report, the discussions of the nature and extent of contamination refer to the presence of contamination in near surface soils. The use of the term "near surface soils" implies that soil contamination occurs only at shallow depths. However, the presumptive need for institutional controls and the understanding that all the proposed remedial alternatives will leave some soil contamination in place suggests that soil contamination occurs at depths greater than two feet below ground surface. Please define the term "near surface soils" and clarify the depth of contamination being considered.
3. Two of the remedial alternatives propose soil excavation to mean higher high water (MHHW). In addition, all the remedial alternatives propose that only the utilities above MHHW (either in paved areas only or both paved and unpaved areas) will be addressed.

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The only rationale provided for choosing MHHW as the target elevation is to avoid excavating below the groundwater table. Please provide a more complete justification for choosing MHHW as the target elevation for soil excavation and for only addressing utilities above MHHW. Also, please provide the range of depth to MHHW (this information was supposed to be provided in Table F-1 but was not included in the appendix).

Specific Comments:

1. Pg. 2-13 states that "Inhalation of VOCs released from soil was considered to be incomplete because of the low volatility of PAHs and PCBs and the rapid dilution and dispersion of any chemicals released to outdoor air". However, the potential inhalation and exposure to vapors volatilizing from combined surface and subsurface soil and groundwater is considered to be a significant pathway for utility workers. Please provide more justification for the quoted statement (e.g. information on soil concentrations or a reference to a previous report). Also, please address whether this assessment would be accurate for future land use scenarios (e.g. residential housing).
2. Pg. 4-2 states that as part of the excavation alternative, interim restrictions would be implemented to address any remaining soils to prohibit soil-intrusive activities. Please specify what interim restrictions would be implemented.
3. Pg. 4-2 states that institutional controls will be necessary to ensure the integrity of the two-foot soil cover over contaminated soils. Please provide more specific information on what mechanisms will be implemented through the O&M and Post-Closure Monitoring Plan to ensure the integrity of the soil cover, particularly since some of these areas include backyards.

If you have any questions, please contact me via phone (510.622.2401) or email ([AFarres@waterboards.ca.gov](mailto:AFarres@waterboards.ca.gov)).

Sincerely,



Agnes Farres  
Project Manager

Enclosure

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