



October 31, 2006  
Project 4850.005.3

Mr. James B. Sullivan and Ms. La Rae Landers  
Department of the Navy  
Base Realignment and Closure  
Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310

Subject: Comments on September 2006 Draft Feasibility Study for Installation  
Restoration Site 31, Former South Storage Yard  
Naval Station Treasure Island  
San Francisco, California

Dear Mr. Sullivan and Ms. Landers:

On behalf of the Treasure Island Development Authority (TIDA), Geomatrix Consultants, Inc. (Geomatrix) has reviewed the September 2006 Draft Feasibility Study (FS) for Installation Restoration Site 31, Former South Storage Yard (Draft Site 31 FS). The document recommends Alternative 5, which includes complete removal of affected soil in the five debris areas. This alternative will allow for unrestricted use of the site following implementation. We support the Navy's recommended alternative.

Our review was focused on the text, table and figures, and the costs in Appendix C. We have the following comments on the Draft report.

#### **GENERAL COMMENT**

- The Human Health Risk Assessment (HHRA) in the Site 31 Remedial Investigation (RI) Report and information presented in Appendix A of the Draft Site 31 FS indicate that naphthalene is a significant risk driver for alternative land uses at Site 31. However, the Draft Site 31 FS states that naphthalene is not being considered as a chemical of concern (COC) for Site 31 because it is co-located with other COCs and will be addressed via the remedy that is addressing the other COCs. While this may be true for Alternative 5 (complete removal), it would not necessarily be true for other remedies that rely on institutional controls and engineering controls for soil that would remain in place. Because the exposure pathway of concern for naphthalene (i.e., vapor intrusion) is very different from the exposure pathway of concern for other COCs (i.e., direct contact), different engineering controls would have to be used to address naphthalene (i.e., vapor barrier instead of a cap). Because Alternative 5 (complete removal) is the recommended alternative, we will not request any change to the document. However, if the final alternative is different from Alternative 5, this issue would need to be addressed.



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Additionally, we believe that the confirmation sampling program during excavation should consider naphthalene.

## **SPECIFIC COMMENTS**

### SECTION 2

- Section 2.3, third paragraph. The text indicate that Site 31 is located within Parcels T094 and T095. The text should also acknowledge that parts of Site 31 are within Parcels T089 and T092 and these additional parcel numbers should be shown on Figure 2-4 Also, see Executive Summary, page ES-1.
- Section 2.4.6.1, first paragraph. The text refers to a “pipeline alignment.” Please specify what pipeline is in the alignment.
- Section 2.7.3, second paragraph. The text states, “Because groundwater is not considered to be potable, groundwater at IR Site 31 was not considered to be a potential exposure media to humans.” Please clarify that direct ingestion of groundwater was not considered, however, other exposure pathways (direct contact and volatilization) were considered.
- Figure 2-2. The site boundary shown on this figure is not correct.

### SECTION 3

- Section 3.1.3, Remedial Action Objectives (RAO). We suggest that second RAO specifically include a utility worker along with a construction worker. This comment also applies to the Executive Summary, page ES-7.
- Section 3.1.4, last sentence of the second paragraph. The text states, “The use of 12 ng/kg for dioxin in soil was determined to be protective of residential reuse...” Please provide the reference where this determination was made.
- Section 3.3, last bullet. The text states that “...Site 31 presents a risk below the risk management range for current paved conditions as an elementary school.” Actually, the calculated risk was within, but at the lower end of the risk management range.

### SECTION 4

- Section 4.2.3.2, last paragraph. The text discusses deed notices but not deed restrictions, whereas Table 4-1 discusses deed restrictions but not deed notices. It appears that both deed notices and deed restrictions should be included in the text and in Table 4-1.



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- Section 4.2.4.1 (In Situ Bioremediation) and Section 4.2.4.10 (Incineration). The text and Table 4-1 should acknowledge that neither of these technologies will treat lead.
- Section 4.3 (Summary of Retained Remedial Technologies and Process Options). The text at the end of this section suggests that low temperature thermal desorption, soil washing, and incineration have been retained. However, previously they were eliminated. It is unclear why these three technologies are being discussed under the discussion of technologies that have been retained.

#### SECTION 5

- The last sentence in the first paragraph of Section 5.1 states that all alternatives meet the RAOs identified in Section 3.1.3. However, Alternative I, No Action, does not meet the RAOs, as stated in Section 6.1. The text in Section 5.1 should be revised to be consistent with the text in Section 6.1.

#### SECTION 6

- Section 6.4, Engineering Controls, Institutional Controls, and Excavation (Debris Areas C and D Excluding Street and Off-Site Disposal of Soil). It is unclear why this alternative excludes excavation of soil from Area D that is beneath the street. Please provide the rationale.

#### SECTION 8

- Throughout the discussion, the text should indicate that Alternative 5 would reduce risks to current utility workers. (See suggested revision to RAO in Section 3.1.3.)

#### APPENDIX C (COST ESTIMATES)

- Demolition and Disposal of Concrete and Pavement—It is unclear why the costs under this heading are greater for Alternative 4 (approximately \$83,000) than for Alternative 5 (approximately \$70,000). The area requiring demolition is greater under Alternative 5.
- Excavation of Contaminated Soil—It is unclear why costs under this heading are greater for Alternative 4 (approximately \$237,000) than for Alternative 5 (approximately \$111,500) when the scope of excavation under Alternative 5 is greater than that under Alternative 4.
- Alternative 4 includes an item for capping which appears to be a RCRA-style cap over approximately 3,500 square yards of the site. This is significantly greater than the 14,500 square feet (1600 square yards) to be excavated under this option. There is no mention of such a cap in the description of alternatives in the text.



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We appreciate the opportunity to review the Draft Site 31 FS. Feel free to contact me if you have any questions.

Sincerely yours,  
GEOMATRIX CONSULTANTS, INC.

Gary R. Foote, P.G. #5044  
Principal Geologist

GRF/jd  
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cc: Mr. Jack Sylvan, TIDA  
Mr. Marc McDonald, TIDA  
Mr. David Rist, Cal EPA Department of Toxic Substances Control  
Mr. James Ricks, U.S. Environmental Protection Agency  
Ms. Agnes Farres, Cal EPA Regional Water Quality Control Board