RESPONSES TO THE CITY AND COUNTY OF SAN FRANCISCO COMMENTS ON THE DRAFT PCB SUMMARY REPORT, NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA (JANUARY 2005) AND RESPONSES TO REGULATORY AGENCY COMMENTS ON THE DRAFT PCB SUMMARY REPORT, REVISION 01, NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA (APRIL 2007)

This document presents the U.S. Department of the Navy's (Navy) responses to comments from the City and County of San Francisco on the "Draft PCB Summary Report, Naval Station Treasure Island" dated December 8, 2004. Additionally, this document presents the U.S. Department of the Navy's (Navy) responses to comments from the regulatory agencies on the "Draft PCB Summary Report, Revision 01, Naval Station Treasure Island" dated February, 2007. The Navy received comments from the Treasure Island Developmental Authority (TIDA) project office and its consultants, Geomatrix Consultants, Inc. (GMX) on March 9, 2007, from the U.S. Environmental Protection Agency (EPA) on March 30, 2007, and from the Department of Toxic Substance Control (DTSC) on August 30, 2007.

RESPONSES TO THE CITY AND COUNTY OF SAN FRANCISCO COMMENTS ON THE DRAFT PCB SUMMARY REPORT, NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA

General Comments

1. **Comment:** **Wipe sample results. We note that all but one wipe sample had no detections of PCBs. We wish to confirm that the wipes were pre-soaked in the proper solvent (hexane) before sampling.**

   Response: **Text will be clarified to indicate wipes were pre-soaked with hexane as described in the Sampling and Analysis Plan.**

Specific Comments

1. **Comment:** **Section 2.2 (p.2): Parcel T101 is on the northwest side of the island rather than the northeast side.**

   Response: **The text in Section 2.2 has been revised as suggested.**

2. **Comment:** **Section 3.2 (p.5): The text indicates that the Navy concluded that some previously identified electrical devices "did not exist." Does it mean that they never existed or does it mean that they do not currently exist?**

   Response: **The text has been modified to state the following: "Field investigators found no physical evidence identifying the locations of the remaining 144 devices. This investigation assumed these 144 devices either did not exist, were removed, or were duplicate locations."**

3. **Comment:** **Parcel T002, Device EP 2-1 (p. A-1): Why were no samples collected on the west side of the pad?**

   Response: **The pad was adjacent to a building wall on the west side. The diagram on page A-1 has been modified to indicate a wall on the west side.**

4. **Comment:** **Parcel T005, Device N299605YETA (p. A-6): Analytical results for wipe samples PCBWP005-2A, -2B and –2C are missing from the table.**

   Response: **The table on page A-6 has been modified to present the wipe sample results for -2A through -2C.**

5. **Comment:** **Parcel T010, Device TX-1 (p. A-13) and Device TX-2033 (p. A-16): The text states that detection limits for wood samples were elevated due to presence of creosote, however, the detection limits shown in the tables do not appear elevated (<1 mg/kg).**

   Response: **In general, compared to the detection limits for soil, concrete, and asphalt samples, the detection limits for most wood samples were several orders of magnitude greater. While a detection limit of 1 mg/kg is less than most of the detection limits for other wood samples, it is still 1 or 2 orders of magnitude greater than the detection limits for most soil, concrete, and asphalt samples. Appendices C and D provide the analytical results, including the detection limits for nondetected PCBs.**

6. **Comment:** **Parcel T039, Device EP 39-1 (p. A-32): The analytical result for one of the concrete samples (2.7 mg/kg) exceeds the high occupancy**

criteria of 1 mg/kg. The text incorrectly says it does not. This device should be added to the Table on page 21 and discussed in Section 5.0. This former transformer appears to be at an exterior location. If so, why were no soil samples collected around the concrete pad?

Response: **The analytical result shown on the device summary sheet on page A-32 has been revised because the "less than" symbol (<) was inadvertently omitted. PCBs were not detected in sample PCBC-1B. Although the device is located outdoors, there was no exposed soil adjacent to the pad.**

7. **Comment:** **Parcel T076, Device TX-125 (p. A-37): The text indicates that the transformer had been moved and the pad removed. Could the former pad location be identified? If so, soil samples should be collected at this location.**

Response: **The parcel summary in Section 4.0 for Parcel T076 has been revised to indicate that while wipe samples were collected from TX-125 after it was relocated to the removed transformer compound, soil and concrete samples could not be collected because field investigators could find no physical evidence identifying the location of the former pad.**

8. **Comment:** **Parcel T084, Device TX-128 (p. A-48): Why were no asphalt samples collected on the west and south side of the concrete pad?**

Response: **The west and south sided were flush against the walls of the adjacent structure. The diagram on page A-48 has been modified to depict the wall.**

9. **Comment:** **Parcel T097, Device T097A (p. B-5): Why were no wipe samples collected from this device (which was also stained)?**

Response: **Wipe samples were not collected at T097A because the Final PCB Sampling and Analysis Plan (Sullivan Consulting Group 2004) did not propose wipe samples at this location.** While staining was observed during the initial site visit, no suspicious staining was observed during subsequent inspections. The initial staining observed at T097A was likely due to a water sprinkler that sprays the device repeatedly during the day.

PCBs were not detected in the soil and concrete samples collected at this location.

10. **Comment:** **Parcel T100/101 and T111 (p. 16): Even though devices on these parcels are being addressed under the EBS Data Gaps Investigation, for completeness, it would be helpful to include information about what was found and how issues are being resolved.**

Response: **Section 2.2 has been revised to provide additional detail regarding the results and proposed actions for the two transformers investigated during the Environmental Baseline Survey (EBS) Data Gaps Investigation.**

RESPONSES TO COMMENTS FROM GARY FOOTE, PRINCIPAL GEOLOGIST, GEOMATRIX CONSULTANTS, INC., ON BEHALF OF TIDA

Specific Comments

1. **Comment:** **Section 2.2: The text summarizes results from an investigation at a transformer on Parcel T111 that was conducted as part of the Environmental Baseline Survey (EBS) Data Gaps Investigation. For completeness, we recommend that the data from this investigation be included in this report.**

   Response: **Section 2.2 has been revised to provide additional detail regarding the results and proposed actions for the two transformers investigated during the EBS Data Gaps Investigation. Analytical data can be found in the Final Field Activity Report EBS Data Gaps Investigation (Shaw 2005). The transformer investigated during the EBS Data Gaps Investigation at Parcel T111 is being addressed as part of Remedial Investigation of Installation Restoration Site 32.**

2. **Comment:** **Section 3.2, second paragraph: As written, it is unclear whether sampling was conducted at any of the 144 locations where devices were not found. It is our understanding that the Navy DID conduct sampling when the location of a device could be identified, even if the device itself was not located (i.e., empty pad scenarios). Please confirm and clarify in the text.**

   Response: **Section 3.3 has been revised to indicate that if a device appeared to have been removed, samples were collected when the former location of a device, such as a concrete pad, could be identified.**

3. **Comment:** **Section 3.3: This section should provide a brief summary of the general sampling procedures and strategy. This discussion should include the rationale for composite sampling and the criteria used to analyze sub-samples that comprised the composites.**

   Response: **Section 3.3 has been revised to provide additional detail regarding the sampling strategy and procedures. In addition, Section 3.3 has been revised to provide the rationale for collecting composite samples and the criteria used to analyze the sub-samples.**

4. **Comment:** **Section 4.0, Parcel T023, p. 12: The text should discuss the results from the wipe sample reported at 11 µg/100cm^2, which exceeds the high-occupancy criterion of 10 µg/100cm^2.**

   Response: **Text revised has been revised as suggested.**

5. **Comment:** **Section 4.0, Parcel T076, p. 17: The text indicates that the Navy only collected wipe samples from device TX-125 because the device had been moved from its original location. Please provide the reason why no soil or concrete sampling was conducted at the former device location.**

   Response: **The text describing Parcel T076 has been revised to indicate that while wipe samples were collected from TX-125 after it was relocated to the removed transformer compound, soil and concrete samples could not be collected because field investigators could find no physical evidence identifying the location of the former pad.**

6. **Comment:** **Section 4.0, Parcel T081, p. 18: Please provide information about whether this parcel is a low-occupancy area (similar to what was done at other parcels where concentrations exceed the low-occupancy criterion, such as Parcel T091).**

   Response: **A sentence has been added to indicate the parcel is a low-occupancy area.**

7. **Comment:** **Section 4.0, Parcel T116, p. 25 and Appendix B: It would help to have a single figure that shows the location of all electrical devices in the vault room of Building 3. The diagrams in Appendix B do not provide sufficient information to understand the relative locations of all of the devices.**

   Response: **Figure 3 in the main text already provides a magnified view of the device locations in Building 3.**

8. Comment: Section 5.1: This section only discusses the three parcels with PCB concentrations exceeding the low-occupancy screening criterion. Consistent with Section 5.2, this section should also discuss the five parcels with PCB concentrations exceeding the high-occupancy screening criterion.

   Response: Section 5.2 has been revised as suggested.

9. Comment: Section 5.1, fourth paragraph: The text states that one concrete sample from TX-138 had a concentration above the low-occupancy criterion and all other samples were below both the low- and high-occupancy criteria. We note that one additional sample had a PCB concentration of 6 milligram per kilogram (mg/kg), exceeding the high-occupancy criterion of 1 mg/kg. The text should be revised accordingly.

   Response: The text discussing electrical device TX-138 in Parcel T034 in Section 5.1.1 has been revised to indicate PCB concentrations in the other discrete concrete samples were 6.0 mg/kg, 0.79 mg/kg, and 0.69 mg/kg.

10. Comment: Sections 5.2 and 6.0: There is a discrepancy in the maximum concentration reported at Parcel T116, devices T-1018, T-1012 and T-1016. It is reported at 1.6 mg/kg in Section 5.2, last paragraph at bottom of page 31 and in Appendix B, p. B-97. However, it is reported at 1.4 mg/kg in tables presented on pages 33 and 35.

    Response: The concentrations presented in the tables have been revised. The correct concentration is 1.6 mg/kg.

11. Comment: Section 6.0, third paragraph: The text states that additional sampling is required at location EP 108-1. However, the text does not indicate whether additional sampling is required at location C598. Based on the table presented on page 35, it appears the Navy does recommend additional sampling at C598 and we concur. Please clarify in the text.

    Response: The Navy does not recommend additional sampling at C598. Section 6.0 has been revised to indicate institutional controls will be implemented for C598.

12. Comment: Appendix A: In several cases, the text states that the reporting limits for wood samples were elevated because the laboratory was required

to dilute the samples. However, in some cases, the reporting limit shown in the table does not appear to be elevated and is at the high occupancy criterion of 1 mg/kg. Is the reporting limit shown on the table correct (<1 mg/kg) (e.g., pages A-13, A-16).

Response: The reporting limits shown in the tables in Appendix A are correct (see specific response to City and County of San Francisco comment number 5).

13. Comment: Appendix A, page A-2 (device 627362J88): Please provide an explanation for how soil samples were collected at the locations shown as being a concrete pad. Was soil present on top of the pad or did the Navy sample soil beneath the pad?

Response: The sample location diagram on Page A-2 is not accurate. The diagram has been revised to show both a concrete pad and soil in the area surrounding the transformer.

14. Comment: Appendix A, page A-4 (device TX-140): The conclusion at the bottom of the page states that the site does meet the criteria for low occupancy. This statement is not correct, as PCB concentrations were as high as 210 mg/kg.

Response: The conclusion has been modified to indicate PCB concentrations exceed both the high-occupancy and low-occupancy screening criteria.

15. Comment: Appendix A, page A-30 (device TX-138): The conclusions indicate that the site meets the criterion for low-occupancy (25 mg/kg). However, one concrete sample had a reported PCB concentration of 320 mg/kg. Therefore, this site does not meet the criteria for either low- or high-occupancy and the text should be revised accordingly.

Response: The conclusion has been modified to indicate PCB concentrations exceed both the high-occupancy and low-occupancy screening criteria.

RESPONSES TO COMMENTS FROM CHRISTINE KATIN, REMEDIAL PROJECT MANAGER, EPA

Specific Comments

1. **Comment:** **Section 3.2. Field Survey. Page 5: The second paragraph of this section states that "the survey team located a total of 258 devices in 60 parcels, out of the total 402 devices that had been previously identified during historical surveys." However, this section does not state how the determination was made that the remaining 144 devices (38% of the assumed original total) were duplicates or did not exist. How was this determination made? Were the previously-identified locations sampled?**

   Response: **The text has been modified to state the following: "Field investigators found no physical evidence identifying the locations of the remaining 144 devices. This investigation assumed these 144 devices either did not exist, were removed, or were duplicate locations."**

2. **Comment:** **Sections 5.1 and 5.2 and tables. Polychlorinated Biphenyl Assessment Summary: Phase I and Phase II. Pages 29-33: Please consider including the high-occupancy screening criterion at least once in Section 5 (in the text or in the table footnotes). Although Section 4 (page 6) states the screening criteria, it would be useful to the reviewer to have those values repeated in this section.**

   Response: **The screening criteria for high-occupancy and low-occupancy areas have been added to the footnotes of the tables in Sections 5.1 and 5.2.**

3. **Comment:** **Sections 5.1 and 5.2. Tables. Pages 30 and 33: The notes section of the PCB Summary Sheets in Appendix A and Appendix B (Device Summary Sheets for Phase II) identifies the method by which each composite sample was collected (e.g., "Composite sample of discrete samples collected in respective matrix"). The reviewer would benefit from having this information accessible in the footnotes to the tables or in the text of these sections.**

   Response: **The tables in Section 5 identify which samples are composite samples. The footnotes in the tables for Section 5 have been revised to indicate the composites are composites of the discrete samples.**

4. **Comment:** **Section 5.2. Table. Page 33: Some composite samples in the table are marked with an asterisk (*), but the meaning of the asterisk is not defined. The assumption from the summary sheets is that these samples are "composite samples of discrete samples collected in respective matrix." Please clarify by defining the symbol in the table footnotes.**

Response: **The asterisk was going to be used to identify composite samples. However, composite samples are already identified with a "C" in the column showing the "Sample Matrix (Discrete/Composite)". Therefore, the asterisk has been removed from the table.**

RESPONSES TO COMMENTS FROM HENRY WONG, REMEDIAL PROJECT MANAGER, DTSC

Specific Comments

1. **Comment:** **Figures 2 and 3: The figures' legends identify blue dots as "BELOW CRITERIA FOR LOW OCCUPANCY." Please replace such description with "BELOW CRITERIA FOR LOW OCCUPANCY AND ABOVE CRITERIA FOR HIGH OCCUPANCY."**

   Response: **The legends in Figures 2 and 3 have been revised as requested.**

2. **Comment:** **Section 4.0, page 23, first sentence: Please replace "T104" with "T105."**

   Response: **Page 23, first sentence, "T104" have been changed to "T105."**

3. **Comment:** **Section 4.0, page 24, T109: The large empty pad TX-152(1) is located at an open area accessible by the general public at all times. However, the PCB Summary Report identifies Parcel T109 as a low-occupancy area (i.e., less than 335 hours a year). DTSC disagrees with such designation. Please change all sections of the PCB Summary Report to identify Parcel T109 as a high-occupancy area. On the page 35 table, please identify that remediation (i.e., removal of the contaminated asphalt and subsequent confirmation sampling) is necessary at the TX-152(1) area.**

   Response: **The document has been revised to identify Parcel T109 as a high-occupancy area. Sections 4.0 and 5.0 have been revised to indicate Parcel 109 is a high-occupancy area. Section 6.0 has been revised to indicate that the recommended action for device TX-152(1) is remediation.**

4. **Comment:** **Section 6.0, page 34, second paragraph, first sentence: Please replace "and T023" with "and T034."**

   Response: **Section 6.0, second paragraph, first sentence will be revised as follows: "...located in Parcels T003, T023, and T034...."**

5. **Comment:** **Section 6.0, page 34: The PCB Summary Report states that "there will be notices and covenants restricting use and access to these buildings (i.e., Buildings 1, 450, and 453) and requiring the transferee to maintain the selected remedy of PCB sites as appropriate." The Navy plans to include such notices and covenants in the deed when transferring the property to a transferee.**

Specifying remedies for PCB contamination (i.e., institutional controls) in a property deed, a real estate document, is not sufficient. Instead, DTSC requires that remedies for PCB contamination be established as institutional controls in a form of a "Covenant to Restrict Use of Property, Environmental Restriction" pursuant to the California Code of Regulations, section 67391.1. DTSC and the Navy or future transferee(s) should sign the "Covenant to Restrict Use of Property, Environmental Restriction" and record the executed covenant with the Alameda County Assessor's Office.

Response: **Section 6.1, will be revised to state the following: "Institutional Controls restricting use and access to these buildings will be implemented in the form of a covenant. Pursuant to the existing Memorandum of Agreement executed in March 2000 between the Navy and the DTSC, the Navy will also grant to the DTSC a covenant providing the DTSC with the enforcement authority. Should a future transferee desire to release these restrictions, they would be obliged to separately remediate lead-based paint or PCBs on surfaces or in soils and petition both the Navy and the DTSC independently to obtain a release of the restriction from each party."**

6. **Comment:** **Section 6.0, page 35, Table for Electrical Device Locations Requiring Further Action: Please identify Device TX-152(2) at Parcel 111 with a "Yes" for further delineation.**

Response: **The table in Section 6.0 has been revised to indicate that device TX-152(2) requires further delineation.**

7. **Comment:** **Section 6.0, page 35: The PCB Summary Report identifies that Devices TX-140, TX-2045, and C-598 needing "Implementation of a Remedy," while Devices TX-120, T1102, SW1-73A/B/C, T104, EP 108-1, and TX-152(2) requiring "Remediation." Please describe the cleanup activities involved in "Implementation of a Remedy" and "Remediation."**

Response: **"Implementation of a Remedy" has been changed to "Institutional Controls", and is the recommended action for vaults within buildings where PCB concentrations exceed the low-occupancy criteria.(see response to DTSC specific comment number 5 regarding institutional controls).**

"Remediation" is the recommended action for devices where PCB concentrations were elevated or above low-occupancy criteria in soil. The action includes removal and disposal of PCB contaminated soil.

Section 6.0 has been revised to include the activities required by the recommended actions described above.

8. **Comment:** **Section 6.0, page 35: Please replace "1.4 mg/kg" with "1.6 mg/kg" for PCB concentration from a concrete sample (i.e., Sample ID PCB2C046A) collected at Devices T-1012, T-1016, and T-1018 in Parcel T116.**

Response: **The concentration listed in the table in Section 6.0 has been revised as suggested.**

References

Shaw Environmental, Inc. 2005. "Final Field Activity Report Environmental Baseline Survey Data Gaps Investigation, Naval Station Treasure Island San Francisco, California." May.

Sullivan Consulting Group. 2004. "Final Sampling and Analysis Plan/PCB Sampling and Analysis Plan." January.

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FROM: Christopher M. Ohland

Christopher Ohland, Project Manager

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