

Landers, La Rae CIV NAVFAC SW

From: Agnes Farres [AFarres@waterboards.ca.gov]
Sent: Tuesday, May 30, 2006 4:48 PM
To: Sullivan, James B CIV OASN (I&E) BRAC PMO West; Landers, La Rae CIV NAVFAC SW
Cc: DRist@dtsc.ca.gov; ricks.james@epa.gov; GFoote@geomatrix.com
Subject: Comments on Draft Final Site 31 RI

Attachments: Water Board Comments_Draft Final RI Site 31.doc



Water Board
omments_Draft Fin.

Hi everyone,

Attached are my comments on the Draft Final Site 31 RI. Please call or email if you have any questions.

thanks,

Agnes Farres
Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612
510.622.2401



Linda Adams
Agency Secretary

California Regional Water Quality Control Board

San Francisco Bay Region

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Arnold Schwarzenegger
Governor

Date:
File No. 2169.6013 (AF)

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

SUBJECT: Water Board comments on Draft Final RI for Site 31 on Treasure Island

Dear Mr. Dunaway:

I have reviewed the Draft Final Treasure Island Site 31 Remedial Investigation Report along with the newly updated figures, revised responses to agency comments, and the revised HHRA Appendix which I received electronically on May 15, 2006. My comments are discussed below. If you have any questions, you can contact me via phone (510) 622-2401 or email at AFarres@waterboards.ca.gov.

General Comments:

1. In the Response to Comments on the Draft Site 31 RI, the Navy agreed that volatile compounds were detected in soil and groundwater within 100 feet from the daycare center. While a new figure has been provided to illustrate this, contradictory statements can still be found throughout the Draft Final Site 31 RI stating that there are no buildings within 100 feet from sampling locations where VOCs were detected in soil or groundwater. Please correct these statements to indicate that the daycare center is within 100 feet of detected VOCs in soil and groundwater.

The Navy also stated in their Response to Comments that given the uncertainty of the extent of vapor migration from Site 31, potential impacts of volatile contaminants detected in Site 31 soil and groundwater within 100 feet from the daycare center building will be evaluated as part of the final Site 31 HHRA. However, Section I.8.2 states that the vapor intrusion pathway for elementary school receptors was excluded from evaluation. Please carry forward with the expectation that the potential for vapor migration into the daycare center will be evaluated.

2. Groundwater data was collected from six temporary microwells (30/31MW01, 30/31MW02, 30/31MW03, 30/31MW04, 30/31MW05 and 30/31MW07) to characterize the nature and extent of groundwater contamination at Site 31, as is shown in Figure 4-11. In many instances throughout the document, the Navy refers to seven wells. Please correct these statements to indicate the use of six wells.

Sincerely,

Agnes Farres
Environmental Scientist

Distribution:

Mr. David Rist, Department of Toxic Substances Control

Mr. James Ricks, U.S. Environmental Protection Agency, Region 9

Mr. Marc McDonald, Facilities Director for Treasure Island Development Authority

Mr. Gary Foote, Geomatrix