



California Regional Water Quality Control Board

San Francisco Bay Region



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Linda S. Adams
Secretary for
Environmental Protection

Arnold Schwarzenegger
Governor

Letter sent via email

Date: November 26, 2008
File No. 2169.6013 (PJ)
GeoTracker No.

N60028_001557
TREASURE ISLAND
SSIC NO. 5090.3.A

U.S. Department of the Navy
Attn: Mr. Jim Sullivan
BRAC Program Management Office – West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310
james.b.sullivan2@navy.mil

SUBJECT: Comments on the *Draft Remedial Investigation Report for Installation Restoration Site 33, Waterline Replacement Area*, dated October 2008, Former Naval Station Treasure Island, San Francisco, California

Dear Mr. Sullivan:

Thank you for providing the Water Board with the Draft Remedial Investigation Report for Installation Restoration Site 33, Waterline Replacement Area, dated October 2008. Water Board staff have reviewed the document and have the following comments.

GENERAL COMMENTS

1. To assess the nature and extent of the debris noted on as-built drawings of the waterline replacement area and observed during the removal of the Building 530 fuel pipeline, exploratory trenching was conducted (Section 4.1.1.6). Chemical analytical results from exploratory trench samples are discussed and presented; however, there is no discussion as to the nature and extent of the burnt debris, the stated purpose of the investigation. In addition, all trenches were logged, yet the trench logs are not included in this report. The Water Board cannot conduct a thorough review of this document without the information necessary to evaluate the extent of the burnt debris.
 - Please present the lateral and vertical extent of the burnt debris across the site on figures, and in the text, tables and appendixes, as necessary.
 - Include all available well, boring, and trench logs in Appendix A.
2. Chemical analytical results for soil samples are presented in Section 4.2. The subsections of Section 4.2 discuss the numerical values of the analytical results, the nature; however, they do not discuss the sample's correlation to geographical areas or features on the site (e.g. burnt debris, utility lines, etc.), the extent. Please include a discussion on the extent of contamination as it relates to on-site features (e.g. burnt debris, utility lines, etc.).

2. Dioxin toxicity equivalent quotient (TEQ) concentrations were estimated from the set of toxic equivalency factors (TEFs) published by the World Health Organization (WHO) in 1998. The WHO updated the TEFs in 2005. Please use the updated TEFs in calculating the dioxin TEQs, or provide rationale as to why the 1998 TEF values are appropriately used at Site 33.

SPECIFIC COMMENTS

1. Please clarify the first sentence of Section 5.1.1, "Site 33 is currently vacant and there are current operations".

Please contact me at (510) 622-2756 or pjorgensen@waterboards.ca.gov if you have any questions.

Sincerely,



Paisha Jorgensen, PG
Engineering Geologist

Distribution:

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