



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

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TREASURE ISLAND
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

November 23, 2010

Mr. James B. Sullivan
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NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA –
DRAFT FINAL TECHNICAL MEMORANDUM, SUPPLEMENTAL SOIL SAMPLING AT
YB22 BATTERY SITE

Dear Mr. Sullivan:

The following are the Department of Toxic Substances Control's (DTSC) comments on the *Draft Final Technical Memorandum, Supplemental Soil Sampling at YB Battery Site* dated November 1, 2010 (YB Battery Site TM).

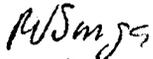
1. Introduction, Last Paragraph, Page 1-1. Please provide the supporting document(s) and date of the BCT concurrence that no additional site characterization was required at the YB Battery Site.
2. Background, Pages 1-2 to 1-3.
 - 2.1 First Complete Paragraph, Page 1-2. Please provide an electronic copy of the 2002 IT Technical Memorandum and the 2005 Shaw report that documents the 2003 removal action. These reports should be included as appendices to provide complete documentation of all removal work in a single document.
 - 2.2 Second Complete Paragraph, Page 1-2. A concrete floor was found at 5.5 feet below ground surface and isolated dry cell batteries were found at this

- depth. Please explain and provided the rationale for why soil samples were not collected and analyzed beneath the concrete floor.
- 2.3 Last Complete Paragraph, Pages 1-2. Please provide the total volume of impacted soil that was removed, where the soil was disposed, and cite the report that documents the soil removal. This report should also be included as an appendix to the YB Battery Site TM.
- 2.4 Last Complete Paragraph, Pages 1-3. Please include Caltrans removal document as an appendix to the YB Battery Site TM.
- 2.5 Please include a description of any subsequent onsite activities after October 2006 sampling and the current condition of the site (paved or bare soil, current use(s) if any, public accessibility, etc.).
3. Conclusion, Page 5-1. Based on the information as currently provided, it is not clear if Caltrans removed the lead and polynuclear aromatic hydrocarbon (PAH) concentrations above the screening levels detected in the 2003 samples. It appears that the top two feet of soil that Caltrans removed may have been the backfill materials placed in 2003 after the soil removal. While step out soil samples were collected and analyzed in 2006, no samples were taken at the corresponding 2003 locations with lead and PAHs above the screening levels to verify their removal in 2006. Please clarify whether soil at 2003 sample locations with lead and PAH above the screening levels were also removed by Caltrans. If the current documentation cannot verify that they were removed, additional sampling may be warranted or a statistical risk evaluation of the existing data may need to be performed to adequately demonstrate that remediation is complete.
4. Figure 2 – YB22 Battery Site Excavation Boundary and Sample Locations.
- 4.1 Please add the sampling dates in the figure Legend as well as the corresponding sample IDs for the 2003 green and purple locations.
- 4.2 PAHs were detected in the 2003 samples above the screening levels in seven samples. The benzo(a)pyrene (BaP) equivalents were calculated for six samples and the results were below its screening level. Please explain why BaP equivalent was not calculated in the seventh sample with the highest BaP detection of 0.88 mg/kg, and why the step out sample SS0007 was not analyzed for PAHs.
5. Tables. Please include the screening levels in Table 1, as well as a summary table comparing the 2003 sample results with the screening levels.

Mr. James B. Sullivan
November 23, 2010
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If you have any questions or comments, please contact me at 510-540-3840 or by e-mail at rsunga@dtsc.ca.gov

Sincerely,



Remedios V. Sunga
Remedial Project Manager
Brownfields and Environmental Restoration Program
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cc: Email Distribution

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