



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

September 15, 2008

Mr. James B. Sullivan
BRAC Environmental Coordinator
Department of the Navy
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DRAFT ANNUAL GROUNDWATER STATUS REPORT: SUMMARY OF
GROUNDWATER MONITORING AT SITE 12, AUGUST AND NOVEMBER 2007;
NAVAL STATION TREASURE ISLAND (NSTI), SAN FRANCISCO, CALIFORNIA.

Dear Mr. Sullivan:

The Department of Toxic Substances Control (DTSC) staff completed its review of the *Draft Annual Groundwater Status Report: Summary Of Groundwater Monitoring at Site 12, August and November 2007; Naval Station Treasure Island, San Francisco, California*, dated July 3, 2008 (Draft Report). The stated principal objective of the groundwater investigation at NSTI is to evaluate whether contaminants are present in groundwater at concentrations that pose a risk to human health or aquatic receptors. Contamination of groundwater at Site 12 is believed to have resulted primarily from former solid waste disposal, petroleum associated with former underground storage tanks, and historic site activities.

Based on our review, DTSC has the following general comments:

- Radiological items found to contain Radium-226 (Ra-226) were discovered in the solid waste disposal areas after the groundwater monitoring program was initiated. Consequently, the groundwater monitoring program should be expanded to include analyses for Ra-226 in order to determine if groundwater at Site 12 has been impacted and to define the extent of impact, as necessary.
- Site 12 groundwater monitoring wells currently sampled as a part of the monitoring program are generally screened between the depths of 2.0 and 13.5 feet below ground surface. A brief discussion providing an explanation as to why deeper groundwater has not been monitored, particularly in the areas of documented

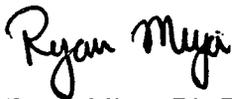
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impacts to groundwater, should be included in the Report. Groundwater monitoring data collected at depth to verify the vertical extent of impact in those areas would be a particularly useful component as a part of the comprehensive site characterization documentation coming forward (Site 12 RI, FS, etc.).

- A general discussion of well decommissioning and abandonment (which wells, dates, and methods used) should be briefly summarized as a part of the historical description for each area, as applicable. If the only well approved for abandonment to date within Site 12 is 12-MW06, the information provided in Section 5.2 is adequate for the Draft Report. However, more specific details and decommissioning / abandonment documentation shall be provided in the forthcoming site characterization documents.

Please revise the Draft Report to incorporate the above comments. If you have any questions, please contact me at (510) 540-3775.

Sincerely,



Ryan Miya, Ph.D.
Senior Hazardous Substances Scientist
Cleanup Program - Berkeley

Copies with sent via email transmission followed by hard copy.

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