



Linda S. Adams  
Acting Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Leonard E. Robinson  
Acting Director  
700 Heinz Avenue  
Berkeley, California 94710-2721



Edmund G. Brown Jr.  
Governor

March 2, 2011

Mr. James B. Sullivan  
BRAC Environmental Coordinator  
Department of the Navy  
Base Realignment and Closure  
Program management Office West  
1455 Frazee Road, Suite 900  
San Diego, California 92108-4310  
[james.b.sullivan2@navy.mil](mailto:james.b.sullivan2@navy.mil)

NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA –  
PROPOSED PLAN/DRAFT REMEDIAL ACTION PLAN, SITE 27/CLIPPER COVE

Dear Mr. Sullivan:

The Department of Toxic Substances (DTSC) received the draft Proposed Plan/Draft Remedial Action Plan (Proposed Plan/Draft RAP) for Site 27 on February 10, 2011. The following are DTSC comments on this document.

1. Introduction, Last Paragraph, Page 2. The reference to the Record of Decision (ROD) should be changed throughout the document to "Record of Decision/Final Remedial Action Plan (ROD/Final RAP)."
2. Previous Investigations, Second Paragraph, Page 3. Please clarify whether all samples from Site 27 and Site 13 or only samples from Site 27 were evaluated to characterize chemicals associated with the skeet range. Site 13 should be shown in Figure 1, and this figure should be referenced in the text for the location of Site 13.
3. 1996 Site 27 Clipper Cove Skeet Range Offshore Investigations, Page 4. The last sentence in the second paragraph should be revised to "PAHs were not detected in the sediment at Site 27 at concentrations that exceeded screening values."

4. Feasibility Study, Page 6. Please change the remedial action objectives acronym to "RAOs" as used in succeeding discussions.
5. Evaluation of Remedial Alternatives, Page 7. Please change the remedial action objectives acronym to "ARARs" as used in succeeding discussions.
6. Evaluation of Remedial Alternatives, Page 9. The introductory sentence to the criteria evaluation should be changed to "The following is a comparative analysis of the remedial alternatives."
7. The Preferred Remedial Alternative, Second Paragraph, Page 11. Please discuss the institutional controls component of the preferred remedial alternative.
8. The Preferred Remedial Alternative, Item 1, Page 11. Please replace "in the remainder of" to "throughout" the site.
9. Community Participation, Second Paragraph, Page 12. Please change Proposed Plan to "Proposed Plan/Draft RAP."
10. The Next Step, Page 13. Please change ROD to "ROD/Final RAP" in three places.
11. Glossary of Terms, Pages 15 and 16.
  - 11.1 Please change ARAR to "ARARs" and RAO to "RAOs."
  - 11.2 The first letter of the main words should be capitalized for terms that have acronyms, i.e., Applicable or Relevant and Appropriate Requirements for ARARs, Chemicals of Concern for COC, etc.
  - 11.3 Please change Proposed plan to "Proposed Plan/Draft Remedial Action Plan (Proposed Plan/Draft RAP)."
  - 11.4 The definition of RAOs should be changed to "Specific goals for protecting human health and the environment. RAOs are developed by evaluating ARARs and the results of the remedial investigations, including human health and ecological risk assessments."
12. Pages 17 and 18. Please replace Proposed Plan with "Proposed Plan/Draft Remedial Action Plan."
13. Figure 2, Page 20. Please replace Proposed Plan/Remedy Selection with "Proposed Plan/Draft Remedial Action Plan" and Record of Decision to "ROD/Final Remedial Action Plan (ROD/Final RAP)."

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14. Figure 3, Page 20. Lead Pellets should be changed to "Lead Shots."

If you have any questions or comments, please contact me at 510-540-3840 or by e-mail at [rsunga@dtsc.ca.gov](mailto:rsunga@dtsc.ca.gov)

Sincerely,



Remedios V. Sunga  
Remedial Project Manager  
Brownfields and Environmental Restoration Program  
Berkeley Office

cc: Email Distribution

Mr. David Clark, U.S. Navy, [david.j.clark2@navy.mil](mailto:david.j.clark2@navy.mil)  
Ms. Danielle Janda, U.S. Navy, [Danielle.janda@navy.mil](mailto:Danielle.janda@navy.mil)  
Mr. Anthony Konzen, U.S. Navy [anthony.konzen.ctr@navy.mil](mailto:anthony.konzen.ctr@navy.mil)  
Ms. Melinda Garvey, U.S. Environmental Protection Agency, Region 9,  
[garvey.melinda@epamail.epa.gov](mailto:garvey.melinda@epamail.epa.gov)  
Mr. Ross Steenson, California Regional Water Quality Control Board,  
[rsteenson@waterboards.ca.gov](mailto:rsteenson@waterboards.ca.gov)  
Mr. Michael Tymoff, TIDA ([Michael.Tymoff@sfgov.org](mailto:Michael.Tymoff@sfgov.org))  
Ms. Mirian Saez, Treasure Island Development Authority, [mirian.saez@sfgov.org](mailto:mirian.saez@sfgov.org)  
Mr. Gary R. Foote, P.G., AMEC Geomatrix, Incorporated, [gary.foote@amec.com](mailto:gary.foote@amec.com)  
Mr. Pete Bourgeois, Shaw Environmental, Incorporated, [peter.bourgeois@shawgrp.com](mailto:peter.bourgeois@shawgrp.com)  
Mr. William Carson, Terraphase Engineering, [william.carson@terraphase.com](mailto:william.carson@terraphase.com)  
Ms. Kristie Reimer, Arcadis, [kristie.reimer@arcadis-us.com](mailto:kristie.reimer@arcadis-us.com)