



**San Francisco Bay Regional Water Quality Control Board**

November 18, 2014 (MLZ)  
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U.S. Department of the Navy  
Attn. Ms. Keith Forman  
BRAC Program Management Office - West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310

Via email only: [keith.s.forman@navy.mil](mailto:keith.s.forman@navy.mil)

Subject: Comments on the Draft 2014 *Site Management Plan, Naval Station Treasure Island, San Francisco.*

Dear Mr. Forman:

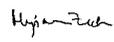
Thank you for the opportunity to review the Draft 2014 Site Management Plan. I have the following comments.

- 1) p.2, Introduction, last paragraph: Please amend the description for Figure 11 to make it clear that environmental restrictions shown are for areas that are already FOSTed, or ready for transfer and part of the current FOST 4.
- 2) Figure 11: Restrictions will be placed in the deeds for various parcels because of residual petroleum hydrocarbons left in place at or below certain depths. Please show the restrictions' prescribed depths:
  - at or below 0.5 feet bgs for portions of Parcel B (Inactive Fuel Line D5),
  - at or below 5 feet bgs for portions of Parcel A (UST 180C) and Parcel E, (Inactive Fuel Line D1B);
  - at or below 5.5 feet bgs for portions of Parcel B (Inactive Fuel Line F2B);
  - at or below 6.5 feet bgs for portions of Parcel E (Inactive Fuel Line F2A);
  - at or below 7 feet bgs for portions of Parcel A (Causeway pipeline) and Parcel F (Petroleum Site 14/22);
  - at or below 8 feet bgs for portions of Parcel H (UST 227).
- 3) Figure 12: If Site 28 is the only site to be included in the Tidelands Trust, please state this in the legend instead of "Property planned for the tidelands trust is not shown for illustrative clarity." If other sites are to be included in the Tidelands Trust, please show this in an additional Figure.

- 4) p. A-12, Site 11: Please indicate the steps the Navy intends to take in order to address the petroleum-contaminated sands and the possible petroleum contamination of the groundwater and discharge to the Bay as a result.
- 5) p. A-12, Site 11: Bridge construction appears to be complete. Can you update the statements about tasks pending bridge construction? For example, instead of saying "The Navy will discuss site closeout with Caltrans when bridge construction work on the site is complete" in the last paragraph, explain that the Navy will be able to discuss issues that pertain to the Site now that bridge construction is complete.
- 6) Site 28, p. 26: You state that "Although Site 28 has a NFA ROD and no LUCs will be included as part of the CERCLA remedy, use of the property will be restricted because it has been included in the Tidelands Trust." Can you describe the California Tidelands Trust, as well as explain the 4-year timeframe allocated for transfer/tidelands trust exchange as mentioned on p. B-13? Please also revise the estimated date for closure
- 7) p. A-36, Site 33: Please change: "The Navy is currently finalizing a RACR for Site 33" to "The Navy has finalized a RACR for Site 33."
- 8) p. A-38, Site 14/22: Please explain how/why Site 14 and Site 22 are being addressed together. Should the Site also include inactive fuel line DIA?
- 9) p. A-49, UST Sites: "Investigation of UST 238 on YBI is on hold until bridge construction is complete." bridge construction now appears complete. Are any activities related to bridge construction, that are preventing the investigation of UST 238? Please also correct the schedule on p. B-22, Appendix B, Item 2003, "additional investigation of UST 238 pending Caltrans project completion" if appropriate.
- 10) p. A-50, Inactive Fuel Pipeline Sites. "The Navy expects to pursue closure of YF3 by meeting the general and medium-specific criteria of the Water Board's Low-Threat Case Closure policy." Please note that the Water Board has already determined that YF3 does not meet the Low-Threat UST Case Closure Policy, and that we are awaiting follow-up from the Navy regarding data gap investigations.
- 11) p. A-51, Inactive Fuel Pipeline Sites. "USCG Investigations are postponed until after Caltrans has completed construction in the area." Again, is there anything currently preventing investigation of the USCG site now that bridge construction is complete? If so, please include a brief explanation/summary.
- 12) p. A-64, Transfer Related: Please update the second paragraph to "FOST 4 was prepared for nine parcels on TI and was finalized in November 2014". or something similar.

Please email me at [mzech@waterboards.ca.gov](mailto:mzech@waterboards.ca.gov) should you have any questions.

Best regards,

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Myriam Zech  
Water Resource Control Engineer

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