

RESPONSE TO REGULATORY AGENCY COMMENTS ON THE DRAFT RECORD OF DECISION/FINAL REMEDIAL ACTION PLAN, INSTALLATION RESTORATION SITE 24, FORMER NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA

This document presents the response to regulatory agency comments on the “Draft Record of Decision (ROD)/Final Remedial Action Plan (RAP), Installation Restoration Site 24, former Naval Station Treasure Island (NAVSTA TI), San Francisco, California,” dated May 2015. The comments addressed below were received from Remedios (Medi) Sunga of the California Department of Toxic Substances Control (DTSC) on June 5, 2015; Myriam Zech of the San Francisco Bay Regional Water Quality Control Board (Water Board) on June 12, 2015; and Christopher Glenn of Langan Treadwell Rollo on behalf of the Treasure Island Development Authority (TIDA) on June 5, 2015.

RESPONSES TO DTSC COMMENTS (MEDI SUNGA)		
NO.	COMMENT	RESPONSE
1.	Document Title. Please change the document title to "Record of Decision/Final Remedial Action Plan."	The document title has been revised as requested.
2.	Section 1.1-Selected Remedies, Pages 3 and 4. Please add a paragraph after the bullet item on page 4 stating that the details of the soil removal, groundwater treatment and radiological investigation/cleanup will be included in the Remedial Design or Remedial Action Work Plan, and that CDPH will be providing support to DTSC on the radiological investigation and cleanup, if cleanup necessary.	The following paragraph has been added to Section 1.1: “The specific design details of the COC remedy (soil removal, groundwater treatment, and groundwater and soil gas monitoring) will be documented in a remedial design/remedial action work plan (RD/RAWP). Radiological surveys are currently being conducted following the “Final Radiological Work Plan, Radiological Surveys at Various Areas, Former Naval Station Treasure Island, San Francisco, CA (July 2015).” DTSC and California Department of Public Health (CDPH) reviewed the radiological work plan. If the presence of radioisotopes is confirmed during the surveys, the ROC remedy will be detailed in a separate document that will be reviewed by the Federal Facility Site Remediation Agreement (FFSRA) signatories and CDPH.”

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RESPONSES TO DTSC COMMENTS (MEDI SUNGA)		
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3.	Section 2.1-Site Description and History, Page 7 and Figure 2-Site 24 Site Features, Page 8. The radiological areas shown in Figure 2 were labelled as "Radiologically Impacted Areas." Please clarify in Section 2.1 the term "radiologically impacted" as defined in the HRA and HRASTM. These areas were classified as radiologically impacted based on site uses; radiological contamination will not be confirmed until after radiological surveys are completed as concurred by CDPH.	<p>The following text has been added to Section 2.1: “Six areas within the Site 24 boundary were identified by either the HRA or the HRASTM as radiologically impacted sites(4); these areas include (1) Building 342, (2) the Building 342 yard area, (3) the Building 342 sanitary sewer line, (4) Building 343, (5) Building 344, and (6) Lot 69. A radiologically impacted site is one that has, or had, the potential for radioactive contamination, based on historical information, in excess of natural background or fallout levels. The designation as radiologically impacted does not confirm that radioactive contamination is present, but only that the possibility exists and must be investigated. Radiologically impacted sites require radiological survey before being released for reuse. Based on final status surveys conducted in 2007 and DTSC concurrence with unrestricted release in 2009, the HRASTM identified that Buildings 343 and 344 met the release criteria and are suitable for transfer with no radiological related notices, restriction, or covenants.”</p> <p>References in the text and Attachment B were renumbered accordingly.</p>
4.	Section 2.5.1-Human Health Risk Assessment, Pages 14 and 15. Please clarify the statement in the last sentence on page 15. ICs would be necessary to ensure that no future groundwater wells for domestic use will be installed but the ICs would not restrict installation of groundwater monitoring wells.	The sentence in Section 2.5.1 is in error and has been deleted.

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RESPONSES TO DTSC COMMENTS (MEDI SUNGA)		
NO.	COMMENT	RESPONSE
5.	Section 2.6.-Treatability Study, Pages 17-19. First Bullet, Page 19: Please delete the word "proposed" since this is a decision document.	The bullets refer to Phase 3 treatability study conclusions; therefore, the first bullet in Section 2.6 has been revised as follows: “ISB technology proved to be effective at reducing high and low COC concentrations throughout the site to achieve the treatability study cleanup goals.”
6.	Figure 6, Alternative 4, Page 31. Please clearly mark the soil excavation area south of Building 99.	Figure 6 has been revised to include an inset box showing an enlargement of the excavation area south of Building 99.
7.	Section 2.11.4-Statutory Determinations, Page 33. First Bullet: Please revise the first sentence to include preventing exposure to COCs in soil gas.	The first bullet in Section 2.11.4 has been revised as requested.
8.	Section 3.0-Responsiveness Summary, Page 35. Please place the discussion in the last paragraph in a new separate CEQA section.	The objective of the last paragraph of Section 3.0 is to document the release of DTSC’s Negative Declaration under the California Environmental Quality Act (CEQA) to the public for review and comment and to report that no public comments were made on the CEQA Negative Declaration. Therefore, the Navy placed the paragraph in the Responsiveness Summary section of the ROD/Final RAP. No revisions to the ROD/Final RAP were made in response to this comment.

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RESPONSES TO WATER BOARD COMMENTS (MYRIAM ZECH)		
NO.	COMMENT	RESPONSE
1.	<p>It is not entirely clear throughout the document when monitoring would stop and when Institutional Controls (ICs) would begin, if any. If the Navy is yet to determine whether cleanup goals have been met at the time of transfer on or about January 30, 2018. ICs will be prescribed but will eventually be required only if monitoring demonstrates that the Remedial Action Objectives (RAOs) have not been met. However, engineering controls and no additional active remediation may not necessarily be acceptable in some locations if cleanup levels reached after remediation continue to show elevated levels of chlorinated ethenes. Would the level of engineering and institutional controls change depending on what the concentrations are, what the constituents are, and what the intended uses are? These facts are relevant to whether engineering controls are appropriate at that site, and it is premature to say that no additional remediation will be necessary. In addition, depending upon the situation the Regional Water Board is hesitant to turn over engineering controls to a developer and/or residential landowner, as opposed to delegating those types of activities to a commercial operation. Again, it would depend upon the levels of cleanup reached and the types of engineering controls proposed.</p>	<p>The FFSA outlines the time frames for groundwater and soil gas corrective action monitoring (conducted during active remediation and for 1 year after achievement of cleanup goals) and detection monitoring (conducted for 3 consecutive years after achievement of cleanup goals), based on the requirements of California Code of Regulations, Title 22, § 66264.100(g) and § 66264.90(c), respectively.</p> <p>If cleanup goals are met at the time of transfer, groundwater and soil gas monitoring would continue as prescribed. If cleanup goals have not been met at the time of transfer, the remedy transitions from groundwater treatment to institutional controls (IC). The concentrations of the chemicals of concern (COC) would dictate the site controls needed.</p> <p>As stated in the ROD/Final RAP, the Navy will develop a land use control remedial design that describes the ICs that would be implemented if Site 24 cleanup goals are not met prior to transfer.</p> <p>No revisions to the ROD/Final RAP were made in response to this comment.</p>

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RESPONSES TO WATER BOARD COMMENTS (MYRIAM ZECH)		
NO.	COMMENT	RESPONSE
2.	<p>General Comment- ARARs: Table C-2, p. C-14, Cal. Code Regs. tit. 22, § 66264.90(c) reads as follows: “Owners or operators shall continue monitoring during the active life of the regulated unit and during the postclosure care period unless the owner or operator can demonstrate that the unit has been in compliance with the water quality protection standard for three consecutive years and all waste and contaminated material has been removed or decontaminated.” The Navy has identified this requirement as an “applicable or relevant and appropriate requirement” (ARAR) for monitoring the groundwater and soil gas. The Water Board supports the Navy’s commitment to “continue to monitor the groundwater and soil gas after the cleanup goals have been met for a period of three years to demonstrate that the cleanup goals have been met for three consecutive years”.</p>	<p>Comment noted.</p>

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RESPONSES TO WATER BOARD COMMENTS (MYRIAM ZECH)		
NO.	COMMENT	RESPONSE
3	<p>General Comment- Irrigation: Agricultural water supply (irrigation) is a groundwater beneficial use listed in the Water Quality Control Plan (Basin Plan) for groundwater. Has the Navy considered the groundwater irrigation pathway? If not, this pathway may require restrictions as well. Please explain to what extent irrigation using groundwater has been evaluated in the risk process and, if necessary, how it will be restricted.</p>	<p>The Navy evaluated the human health pathways shown on Figure 2-1 of the 2008 Remedial Investigation/Focused Feasibility Study (RI/FFS), which did not include agricultural irrigation because Treasure Island groundwater was deemed to have no beneficial use. Groundwater at Treasure Island is not of sufficient quality and nature to be a potential drinking, domestic, or agricultural water supply source pursuant to State Water Resources Control Board Resolution 88-63. The artificial fill forming Treasure Island is not an aquifer. There is no historic or current use of groundwater at Treasure Island, and potential future use of groundwater at Treasure Island is limited by State of California well construction requirements, small volume of fresh water, saltwater intrusion, and potential land subsidence. Please see the attached March 2000 letter from the Navy to the Water Board. In addition, agricultural development of Site 24 is not an intended reuse; therefore, the groundwater irrigation pathway was not evaluated in the 2008 RI/FFS or the 2014 FFSA and is deemed irrelevant to the ROD/Final RAP. No revisions to the ROD/Final RAP were made in response to this comment.</p>

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RESPONSES TO WATER BOARD COMMENTS (MYRIAM ZECH)		
NO.	COMMENT	RESPONSE
4.	General Comment- Unlimited use and unrestricted exposure (UU/UE): While the Navy is expecting to achieve unlimited use and unrestricted exposure, this document needs to clarify that groundwater use for drinking water and possibly irrigation will be restricted, and if such restrictions are consistent with UU/UE.	<p>Unlimited use and unrestricted exposure (UU/UE) cannot be achieved with respect to groundwater because of non-Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) considerations. The limitations on use and restrictions on exposure to groundwater through a drinking water or irrigation pathway are a function of the groundwater not being of sufficient quality and nature to be a potential drinking water source pursuant to State Water Resources Control Board Resolution 88-63. CERCLA remedies include actions that address risk to receptors through complete exposure pathways. The groundwater exposure pathways for drinking water and irrigation are incomplete because of the quality and nature of Treasure Island groundwater; therefore, no CERCLA action is warranted for these pathways.</p> <p>Sections 1.1, 2.11.1, and 2.11.3 of the ROD/Final RAP include references to meeting UU/UE levels. These sections have been revised to indicate that “UU/UE levels will be met for Site 24 media except groundwater which is of insufficient quality and nature to be a potential drinking water source pursuant to State Water Resources Control Board Resolution 88-63”.</p>
5.	Section 1.1 Selected Remedies, (p.3): “Conduct groundwater and soil gas corrective action monitoring and detection monitoring to confirm that cleanup goals are met”. Please clarify the distinction between groundwater and soil gas “corrective action monitoring” and “detection monitoring”.	Please refer to California Code of Regulations, Title 22, § 66264.100(g) and § 66264.90(c). At Site 24, corrective action monitoring will be conducted during active remediation and for 1 year after meeting cleanup goals. Detection monitoring will be conducted for 3 consecutive years after cleanup goals are met. No revisions to the ROD/Final RAP were made in response to this comment.

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RESPONSES TO WATER BOARD COMMENTS (MYRIAM ZECH)		
NO.	COMMENT	RESPONSE
6.	<p>Section 1.1 Selected Remedies (p.3): “If Site 24 cleanup goals are not met at the time Site 24 is transferred, the selected remedy will include (. . .) institutional controls (ICs) to meet RAOs”. How does this meet the Navy’s commitment to conduct monitoring for 3 years after the RAOs are met? Would the Navy require ICs but continue to conduct monitoring for 3 years after implementation of the remedy? Please consider indicating the date the Navy expects transfer to happen. How does property transfer affect monitoring frequency, and who is responsible for monitoring after transfer? Please describe the monitoring frequency clearly before and after transfer, and how monitoring will be used to optimize treatment.</p>	<p>Detection monitoring (3 consecutive years of monitoring) commences once cleanup goals are met. If cleanup goals are met at the time of transfer, groundwater and soil gas monitoring would continue as prescribed. If cleanup goals have not been met at the time of transfer, the remedy transitions from the selected remedy (excavation, groundwater treatment, and monitoring) to ICs. The specific design details of the COC remedy (soil removal, groundwater treatment, and groundwater and soil gas monitoring) will be documented in a RD/RAWP. No revisions to the ROD/Final RAP were made in response to this comment.</p>
7.	<p>Section 1.1 Selected Remedies (p.3): “If Site 24 cleanup goals are not met at the time Site 24 is transferred, the selected remedy will include (. . .) evaluation and potential installation of engineering controls (. . .) and prohibit residential use unless appropriate engineering controls are implemented that are protective of residential receptors.” As written, this section is too vague. The Regional Water Board recommends that the remedy for COCs have specific, identified cleanup levels which must be reached before residential development is permitted, with or without engineering controls. Additional detail should be added concerning the types of engineering controls that are appropriate and identify who will be responsible for maintaining those engineering controls.</p>	<p>The cleanup goals for Site 24 are listed in Table 4 of the ROD/Final RAP. The specific design details of the COC remedy (soil removal, groundwater treatment, and groundwater and soil gas monitoring) will be documented in a RD/RAWP. If necessary, the specific design details of ICs will be documented in a land use control remedial design. No revisions to the ROD/Final RAP were made in response to this comment.</p>

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RESPONSES TO WATER BOARD COMMENTS (MYRIAM ZECH)		
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8.	<p>Section 2.5.1 Human Health Risk Assessment (p. 14): This section states: “In 2001, the Water Board recommended that the Basin Plan be revised to exclude groundwater at TI as a potential source of municipal or domestic water.” Please revise this section as follows: “In 2001, the Navy requested the Regional Water Board's concurrence groundwater at TI meets the exceptions to State Water Resources Control Board Resolution No. 88-63 and Regional Water Board Resolution 89-039 (Sources of Drinking Water Policy) as a potential source of municipal or domestic water. On January 23, 2001, the Regional Water Board sent a letter [insert link here] concurring that the quality and hydrogeologic conditions of the groundwater at Treasure Island are such that the water meets the exceptions to the general rule that all groundwater is a potential source of drinking water.”</p> <p>For this reason the Water Board does not require cleanup to groundwater drinking water standards. This exception, however, results in a restriction on groundwater use as drinking water, and as such should be memorialized in a document associated with the deed of trust such as a deed restriction or the Covenant to Restrict Use of Property (CRUP).</p>	<p>Section 2.5.1 has been revised as follows: “In 2000, the Navy requested the Regional Water Board's concurrence⁽¹⁶⁾ that groundwater at TI meets the exceptions to State Water Resources Control Board Resolution No. 88-63 and Regional Water Board Resolution 89-039 (Sources of Drinking Water Policy) as a potential source of municipal or domestic water. On January 23, 2001, the Regional Water Board sent a letter⁽¹⁷⁾ concurring that the quality and hydrogeologic conditions of the groundwater at Treasure Island are such that the water meets the exceptions to the general rule that all groundwater is a potential source of drinking water.” The existing link to reference 16, the Water Board letter, has been moved to the appropriate place in the inserted text and renumbered.</p> <p>The Water Board’s 2001 letter memorializes the assessment that groundwater at Treasure Island is not of sufficient quality and nature to be a potential drinking, domestic, or agricultural water supply source pursuant to State Water Resources Control Board Resolution 88-63. A deed restriction and Covenant to Restrict Use of Property (CRUP) prohibiting groundwater use would not be necessary because, as stated in the response to Water Board comment number 3, the artificial fill forming Treasure Island is not an aquifer, and the potential future use of groundwater at Treasure Island is restricted by State of California well construction requirements, and limited by the small volume of fresh water, saltwater intrusion, and potential land subsidence.</p>

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RESPONSES TO WATER BOARD COMMENTS (MYRIAM ZECH)		
NO.	COMMENT	RESPONSE
9.	Section 2.9 Remedial Action Objectives (p. 20): Please add the following RAO: “Prevent exposure to groundwater over MCLs through deed restrictions.”	Per the Water Board’s 2001 letter, NAVSTA TI groundwater is not a drinking water source; therefore, remedial action objectives (RAO) for drinking water exposure are not appropriate. No revisions to the ROD/Final RAP were made in response to this comment.
10.	Section 2.11.2.1 Chemical Remedy (p. 30): “Groundwater and soil gas monitoring would be conducted to verify and optimize success of ZVI/ISB groundwater treatment”. Please include a brief explanation about how monitoring will optimize treatment success.	The FFSA indicates that groundwater monitoring is intended to (1) document distribution of injection materials, (2) ensure biotic and abiotic reductive dechlorination of volatile organic compounds is being sustained, (3) evaluate if, where, and when additional maintenance injections are needed, and (4) evaluate whether groundwater remedial goals are met. Based on groundwater monitoring results, groundwater treatment parameters may be adjusted to optimize treatment. The ROD/Final RAP text has been revised as follows: “Groundwater and soil gas monitoring would be conducted to maintain optimal ZVI/ISB groundwater treatment and verify treatment efficacy, and...”
11.	Section 2.11.2.1 Chemical Remedy (p.31): “if cleanup goals are not met at the time Site 24 is transferred, the Navy will place ICs to meet RAOs in the areas of the site where cleanup goals are not met”. If the Site is transferred on or around January 20, 2018, it would seem that there would not be enough time to conduct sufficient monitoring to determine that RAOs have been met, as outlined in the ARARs (see comment #6).	Comment noted. Please see the response to comment 6. No revisions to the ROD/Final RAP were made in response to this comment.

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RESPONSES TO WATER BOARD COMMENTS (MYRIAM ZECH)		
NO.	COMMENT	RESPONSE
12.	Section 2.11.2.1 Chemical Remedy (p.32): “The ICs would (. . .) prohibit residential use unless appropriate engineering controls are implemented that are protective of residential receptors.”	Comment noted.
13.	Section 2.11.2.1 Chemical Remedy (p.32): “Although the Navy may transfer these procedural responsibilities to another party by contract, property transfer agreement, or through other means, the Navy would retain ultimate responsibility for remedy integrity.” Please explain how the Navy will retain ultimate responsibility for remedy integrity after the procedural responsibilities have been transferred to TIDA through the transfer agreement.	The reference to the “ultimate responsibility” to be retained by the Navy is a reference to the Navy’s statutory responsibility under CERCLA, which is retained by the Navy as a matter of law and pursuant to the FFSRA executed by the Navy and regulatory agencies. Specific details regarding the Navy’s retention of ultimate responsibility for remedy integrity will be documented in the post-ROD remedial design. No revisions to the ROD/Final RAP were made in response to this comment.
14.	Section 2.11.3 Expected Outcomes of the Selected Remedies (p. 33): “For the chemical remedy, implementation will be followed by groundwater and soil gas monitoring until analytical results allow for termination of further monitoring.” How will transfer affect monitoring of the remedy at Site 24?	Transfer will not affect groundwater and soil gas monitoring requirements. The Navy will continue to conduct groundwater and soil gas monitoring for the required time frame. No revisions to the ROD/Final RAP were made in response to this comment.

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RESPONSES TO WATER BOARD COMMENTS (MYRIAM ZECH)		
NO.	COMMENT	RESPONSE
15.	<p>Miscellaneous comments:</p> <ul style="list-style-type: none"> - Acronyms and Abbreviations (p. iii): Add: “ISCR: In-situ chemical reduction”. - Section 1.1 Selected Remedies, (p.3): “Implement institutional controls (ICs)” (plural acronym). - Section 2.2, Site Characteristics, Figure 2 (p.8): This Figure includes a “Not to scale” notation, but it does appear to be to scale. Can you indicate the scale? - Section 2.4, Current and Potential Future Site Uses, p. 12, “concessionaire”: does the Navy mean commercial food franchises, or concessionaire parking? - Section 2.10.2.2 Primary Balancing Criteria, Implementability (p.29): “the soil remediation component for each alternative is straightforward” (one word) - Section 2.11.2.1 Chemical Remedy (p. 30): “Building 99 will be evaluated (. . .) Excavation will be followed (. . .) Groundwater and soil gas monitoring will be conducted”. - Section 2.11.1 Rationale for Selected Remedies and 2.11.2.1 Chemical Remedy (p. 30): “Alternative 4 is anticipated to reach cleanup goals faster than other alternatives” (not “more quickly”) - Section 2.11.2.1 Chemical Remedy (p. 32): “A LUC RD that describes the ICs that will be implemented if Site 24 cleanup goals are not met” and “The Navy would be responsible . . .” 	<ul style="list-style-type: none"> - Acronyms: ISCR has been added to the acronym list. - Section 1.1: The writing style guide used in preparing the ROD/Final RAP uses singular acronyms; therefore, no revision to the ROD/Final RAP was made. - Section 2.2: The figure has been reduced to fit the ROD/Final RAP in-text figure format; therefore, the scale is no longer accurate and was removed. - Section 2.4: The Navy assumes that TIDA means food franchises. - Section 2.10.2.2: The text has been revised to indicate “straightforward” as one word. - Section 2.11.2.1: The selected remedy description has been revised to replace “would” with “will.” - Sections 2.11.1 and 2.11.2.1: Comment is editorial in nature; therefore, no revision to the ROD/Final RAP was made. - Section 2.11.2.1: The selected remedy description has been revised to replace “would” with “will.”

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RESPONSES TO TIDA COMMENTS (CHRISTOPHER GLENN, LANGAN TREADWELL ROLLO)		
NO.	COMMENT	RESPONSE
1.	Section 2.4, Current and Potential Future Site Uses, page 12: Please add the following to the second paragraph of this section, “Development plans include placement of bio-retention areas within the southeastern part of Site 24 for treatment of storm water from the planned adjacent residential development.”	The Navy cites the specific planned reuses identified in the published 2011 Final Environmental Impact Report (EIR) and the 2011 TIDA Disposition and Development Agreement. Though Final EIR Section IV.K does discuss bio-retention areas, the proposed locations of bio-retention areas are not specified in the text or on Figure IV.K.6. The Navy acknowledges that bio-retention ponds are part of the current redevelopment plans; however, this level of specificity is not required for the ROD/Final RAP. No revisions to the ROD/Final RAP were made in response to this comment.
2.	Section 2.5.1, Human Health Risk Assessment, page 14: In the third paragraph of this section, please clarify that the 10E-4 to 10E-6 risk range is for cancer risk and the HQ is for systemic health risk.	Section 2.5.1 has been revised to indicate cancer risk and noncancer hazard indices.
3.	Section 2.5.2, Ecological Risk Assessment, page 16: TIDA notes that the 2007 SLERA, which recommended no further action or evaluation of ecological risk, considered future ecological exposure to species adapted to “urban, landscaped habitats.” TIDA notes that the planned storm water bio-retention areas within Site 24, as engineered landscaped areas that do not permanently contain water, fit within the category of “urban, landscaped habitats” and that the conclusions of the SLERA therefore apply to this type of re-use.	Comment noted. The Navy does not disagree with TIDA’s conclusion; however, this level of specificity was not evaluated in the 2007 SLERA and is not required in the ROD/Final RAP. No revisions to the ROD/Final RAP were made in response to this comment.

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RESPONSES TO TIDA COMMENTS (CHRISTOPHER GLENN, LANGAN TREADWELL ROLLO)		
NO.	COMMENT	RESPONSE
4.	<p>Figure 6: Figure 6 shows the area of vinyl chloride in groundwater near 5th Street but does not show any planned residential development blocks as indicated on the legend. Terraphase recommends that the figure be updated to show the planned residential development as seen on Figure 3. Based on Figure 6, it appears that the vinyl chloride at wells TW-14 and TW-41 may be underneath the planned residential development. If cleanup goals are not met, the alternative of institutional controls as indicated on page 32 (Section 2.11.2.1) may impact development plans.</p>	<p>Figure 6 has been revised to show the planned residential development blocks.</p> <p>The Navy anticipates that cleanup goals will be met at the time of Site 24 transfer. However, should cleanup goals not be met at transfer, contingency ICs become part of the selected remedy such that redevelopment of the site is conducted in a manner that is protective of human health and the environment. Residential redevelopment would still be possible provided that the ICs are implemented as part of redevelopment.</p>
5.	<p>Figure 6: “Excavation” is misspelled in the second line of the figure legend.</p>	<p>Figure 6 has been revised to correct the spelling of “excavation.”</p>