



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

San Francisco Bay Regional Water Quality Control Board

March 2, 2016 (MLZ)
Geotracker Parent Facility ID: DOD100333400

N60028_002702
TREASURE ISLAND
SSIC NO. 5090.3.A

U.S. Department of the Navy
Attn. Mr. Keith Forman
BRAC Program Management Office - West
33000 Nixie Way
Building 50 Attention Keith Forman
San Diego, CA 92417
Via email only: keith.s.forman@navy.mil

Subject: Water Board comments on the *Draft Installation Restoration Site 32, Former Training and Storage Area Record of Decision/Final Remedial Action Plan, Naval Station Treasure Island, San Francisco, dated December 22, 2015.*

Dear Mr. Forman:

Thank you for the opportunity to review the Draft Record of Decision/Final Remedial Action Plan for Installation Restoration Site 32, Former Training and Storage Area, dated December 22, 2015.

This Draft Record of Decision/Final Remedial Action Plan (ROD/Final RAP) presents the basis for a No Further Action determination by the Navy for chemical constituents at Site 32. Chemicals that exceeded screening criteria in soil at the time of the Remedial Investigation in 2008 include total petroleum hydrocarbons (TPH) as diesel and motor oil, benzo[a]pyrene (B(a)P), Aroclor-1260, DDD, DDT, heptachlor epoxide, arsenic, lead, and dioxins. Chemicals that exceeded screening criteria in groundwater include TPH, arsenic, barium, chromium, cobalt, copper, lead, mercury, nickel, silver, vanadium, and zinc.

Based on these exceedances, remedial actions were implemented consisting of

- 1) excavation of 13,500 tons of soil containing PCBs greater than 1 milligram per kilogram (mg/kg). As part of this excavation, soil contaminated with TPH, B(a)P, lead, arsenic, and dioxins was also removed.
- 2) enhanced aerobic bioremediation of TPH-impacted groundwater present in the excavation.

Post-remediation groundwater monitoring demonstrated that chemical concentrations were below the Site 32 cleanup goals based on protection of aquatic receptors and unrestricted site use.

We are providing the following comments.

D. L. ... H. Bruce E.

1515 Clay St., Suite 1400, Oakland, CA 94612 | www.waterboards.ca.gov/sanfranciscobay

Specific comments

- 1) Table 1. Previous Investigations and Cleanup Actions, Row 2, p.6.
Following the "Environmental Baseline Survey" box, create a separate box entry for "Data Gap Investigation, 2003": "A data gaps investigation was conducted in 2003, etc."
- 2) Table 1. Previous Investigations and Cleanup Actions, Row 4, p.6.
The Navy mentions that "The SLERA did not identify any ecological resources at TI that need to be protected." The SLERA (*Final Screening-Level Ecological Risk Assessment for Sites 6, 12, 21, 24, 30, 31, 32, and 33*, dated March 2007) indicates that the maximum concentrations of several Chemicals of Potential Ecological Concern at Site 32 pose "potentially unacceptable risks to plant, invertebrate, and vertebrate receptors based on the conservative assumptions of the SLERA", but that, as stated in the Remedial Investigation Report, Site 32 "does not support a natural ecosystem or provide habitat for ecologically relevant receptors". While this finding may apply to current site use/conditions, what if site use/conditions were to change due to redevelopment or other unforeseen environmental changes such as sea level rise? Will controls be in place to prevent ecological receptor exposures should site conditions change, or require the re-evaluation of exposure pathways? We note that the ROD for Site 6 requires, if wetland habitat is created or natural habitat otherwise changes, that specific development plans account for protection of ecological receptors. The Navy or developer should consider appropriate controls or future re-evaluation of the exposure pathways if natural habitat evolves at Site 32.
- 3) Table 1. Previous Investigations and Cleanup Actions, Row 1, p.7:
Consider adding the word "soil": "None of the remaining *soil* chemical concentrations exceeded the Site 32 cleanup goals . . ."
- 4) Table 1. Previous Investigations and Cleanup Actions, Row 1, p.7:
Can you provide the 2010 updated risk based screening concentrations?
- 5) Table 1. Previous Investigations and Cleanup Actions, Row 1, p.7 and 2.5.3 TSCA Cleanup Action, paragraph 2, p. 13:
Please specify which COCs remained above the 2010 updated risk based screening concentrations, and at which levels.
- 6) Under 2.4 Current and Potential Future Land and Resources Uses, p. 9, after the last paragraph, add the following:
"The Navy will include a restriction in appropriate real property transfer documents that will prohibit the installation of groundwater supply wells for any purpose."

Miscellaneous comments

- 1) 2.1 Site Description and History, third paragraph, p.3:
Please rewrite the description to make it obvious that building 462 is the only building which remains on site to date.
- 2) Please consider printing the document double sided.

As always, please contact me at Myriam.zech@waterboards.ca.gov or 510-622-5684 if you wish to discuss.

Sincerely,



Digitally signed
by Myriam Zech
Date: 2016.03.02
14:19:34 -08'00'

Myriam Zech
Water Resource Control Engineer
Groundwater Protection Division

cc: Ms. Kimberly Noble, U.S. Department of the Navy, kimberly@marrscorp.com
Mr. David Clark, U.S. Department of the Navy, david.j.clark2@navy.mil
Ms. Remedios Sunga, California Department of Toxic Substances Control, rsunga@dtsc.ca.gov
Mr. Alec Naugle, SF Bay Regional Water Board, alec.naugle@waterboards.ca.gov
Ms. Nadia Burke, U.S. Environmental Protection Agency, Burke.NadiaHollan@epa.gov
Mr. Bob Beck, Treasure Island Development Authority, bob.beck@sfgov.org
Mr. Christopher Glenn, cglenn@Langan.com
Ms. Jessica O'Sullivan, Tetra Tech EMI, jessica.OSullivan@tetrattech.com
Mr. William Carson, Terraphase Engineering, william.carson@terraphase.com