



**DEPARTMENT OF THE NAVY**  
**BASE REALIGNMENT AND CLOSURE**  
**PROGRAM MANAGEMENT OFFICE WEST**  
1455 FRAZEE RD, SUITE 900  
SAN DIEGO, CA 92109-4310

5090  
Ser BPMOW.sda/0274  
23 Mar 2006

From: Commander, Southwest Division, Naval Facilities Engineering Command  
To: Distribution

Subj: FINAL FINDING OF SUITABILITY TO TRANSFER (FOST) – YERBA BUENA ISLAND  
TRANSFER PARCEL, NAVAL STATION TREASURE ISLAND, SAN FRANCISCO,  
CALIFORNIA

Encl: (1.) Final FOST – Yerba Buena Island Transfer Parcel, Naval Station Treasure  
Island, San Francisco, California, dated March 22, 2006.

1. Enclosure (1), the Final FOST – Yerba Buena Island Transfer Parcel, Naval Station  
Treasure Island, is provided for your files. Thank you very much for your assistance on this  
project.

2. For further information, please contact Mr. Scott Anderson at (619) 532-0938 or me at  
(619) 532-0966.

A handwritten signature in black ink, appearing to read "J. Sullivan", with a stylized flourish at the end.

**JAMES B. SULLIVAN**  
BRAC Environmental Coordinator  
By direction of the Director

Distribution:

Ms. Patti Collins, U.S. Environmental Protection Agency, Region IX  
Mr. David Rist, California Department of Toxic Substances Control  
Mr. Alan Friedman, California Regional Water Quality Control Board  
Mr. Jack Sylvan, City of S.F. Mayor's Office of Base Reuse and Development  
Mr. Marc McDonald, Treasure Island Development Authority  
Ms. Jill Bensen, CH2M Hill  
Mr. Gary Foote, Geomatrix Consultants  
Ms. Marcie Rash, Tetra Tech EM Inc.  
Mr. John Baur, Shaw Environmental & Infrastructure (w/o enclosures)

5090  
Ser BPMOW.sda/0274  
23 Mar 2006

Community RAB Members:

Mr. Nathan Brennan  
Ms. Dale Smith  
Mr. Douglas Ryan  
Mr. Woody Baker-Cohn  
Mr. Saul Bloom, ARC Ecology



**Final**

## **Finding of Suitability to Transfer for Property on Yerba Buena Island**

**Naval Station Treasure Island  
San Francisco, California**

**March 22, 2006**

Prepared for:

**Base Realignment and Closure  
Program Management Office West  
San Diego, California**

Prepared by:

**SulTech, A Joint Venture of Sullivan Consulting Group  
and Tetra Tech EM Inc.  
1230 Columbia Street, Suite 1000  
San Diego, California 92101**

Prepared under:

**Naval Facilities Engineering Command  
Contract Number N68711-03-D-5104  
Contract Task Order 034**

**DS.B034.14218**

**Final**

**FINDING OF SUITABILITY TO TRANSFER FOR PROPERTY ON  
YERBA BUENA ISLAND**

Naval Station Treasure Island  
San Francisco, California

Contract Task Order 034  
DS.B034.14218

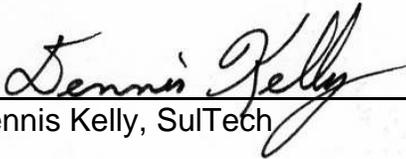
**PREPARED FOR:**

**DEPARTMENT OF THE NAVY**

---

**REVIEW AND APPROVAL**

Project Manager:

  
Dennis Kelly, SulTech

Date: March 15, 2006

## **TABLE OF CONTENTS**

---

REVIEW AND APPROVAL .....	i
ACRONYMS AND ABBREVIATIONS .....	v
1.0 PURPOSE .....	1
1.1 INTRODUCTION .....	1
1.2 ORGANIZATION OF THE FINDING OF SUITABILITY TO TRANSFER .....	2
1.3 DOCUMENTS REVIEWED .....	3
2.0 PROPERTY DESCRIPTION .....	18
3.0 REGULATORY COORDINATION .....	19
4.0 NATIONAL ENVIRONMENTAL POLICY ACT CONSIDERATIONS .....	19
5.0 ENVIRONMENTAL CONDITION OF PROPERTY AREA TYPE .....	19
6.0 ENVIRONMENTAL FACTORS .....	21
6.1 ENVIRONMENTAL FACTORS THAT WARRANT RESTRICTIONS AND/OR REQUIRE NOTIFICATION .....	21
6.1.1 Asbestos-Containing Material .....	21
6.1.2 Underground Storage Tank 66 .....	22
6.1.3 Petroleum Program .....	23
6.1.4 Lead-Based Paint .....	23
6.1.5 Polychlorinated Biphenyls .....	27
6.2 ENVIRONMENTAL FACTORS THAT WARRANT NO RESTRICTIONS .....	28
6.2.1 Radon .....	28
6.2.2 Radiological Activities .....	28
6.2.3 Groundwater .....	29
6.2.4 Storm Sewers .....	29
6.2.5 Installation Restoration Program .....	30
6.2.6 Aboveground Storage Tanks .....	31
6.2.7 Petroleum Program .....	31
6.2.8 Adjacent Properties .....	32
7.0 PROPOSED REUSE .....	35

**TABLE OF CONTENTS (Continued)**

---

8.0	CONVEYANCE CONDITIONS AND NOTIFICATIONS .....	35
8.1	NOTICES.....	35
8.1.1	Notice of Hazardous Substances.....	35
8.1.2	Asbestos-Containing Material .....	36
8.1.3	Lead-Based Paint .....	36
8.1.4	Residual Petroleum Contamination: UST 66.....	36
8.1.5	Ongoing Petroleum Corrective Actions: YF3.....	37
8.1.6	Polychlorinated Biphenyls .....	37
8.2	COVENANTS, WARRANTIES, AND RESTRICTIONS .....	37
8.2.1	All Remedial Action Has Been Taken.....	37
8.2.2	Additional Remediation Obligation.....	38
8.2.3	Right of Access .....	38
8.2.4	Enforcement Authority .....	38
8.2.5	Lead-Based Paint .....	38
8.2.6	Ongoing Petroleum Corrective Actions: YF3.....	39
8.2.7	Residual Petroleum Contamination: UST 66 .....	40
8.2.8	Groundwater Use Restriction.....	40
8.2.9	Asbestos-Containing Material Restriction.....	40
8.2.10	Polychlorinated Biphenyls Restriction .....	40
8.3	SUMMARY OF NOTIFICATIONS AND RESTRICTIONS .....	41
9.0	FINDING OF SUITABILITY TO TRANSFER .....	42

## **FIGURES**

---

- 1 Regional Location Map
- 2 Environmental Condition of Property Area Type Classification Map
- 3 Investigation Sites Within and Adjacent to the Transfer Parcel
- 4 Planned Reuse Areas
- 5 Areas Subject to Petroleum and PCB Notices and Restrictions

## **TABLES**

---

- 1 Summary of ECP Area Types for EBS Parcels in Transfer Parcel
- 2 Summary of Asbestos-Containing Material Survey Results
- 3 Summary of Aboveground Storage Tanks and Underground Storage Tanks
- 4 Lead-Based Paint Information for Buildings Constructed Before 1978
- 5 Inventory of Equipment with Dielectric Fluid that may Contain PCBs
- 6 Summary of CERCLA Hazardous Substances Stored, Released, or Disposed of in the YBI Transfer Parcel

## **APPENDIX**

---

- A Response to Comments

## ACRONYMS AND ABBREVIATIONS

---

ACM	Asbestos-containing material
AST	Aboveground storage tank
ATG	Allied Technology Group, Inc.
Bay Bridge	San Francisco-Oakland Bay Bridge
BCT	Base Realignment and Closure Cleanup Team
bgs	Below ground surface
BRAC	Base Realignment and Closure
Cal EPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CAP	Corrective action plan
CCR	<i>California Code of Regulations</i>
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	<i>Code of Federal Regulations</i>
DoD	U.S. Department of Defense
DTSC	Department of Toxic Substances Control
EBS	Environmental baseline survey
ECP	Environmental condition of property
EFA WEST	U.S. Department of the Navy, Naval Facilities Engineering Command, Engineering Field Activity West
EPA	U.S. Environmental Protection Agency
ERA	Ecological risk assessment
ERM-West	Environmental Resources Management-West, Inc.
FAD	Friable, accessible, and damaged
FFSRA	Federal Facility Site Remediation Agreement
FHWA	Federal Highway Administration
FOST	Finding of suitability to transfer
HUD	U.S. Department of Housing and Urban Development
IRP	Installation Restoration Program
IT Corp.	IT Corporation
ITSI	Innovative Technical Solutions, Inc.
LBP	Lead-based paint
mg/kg	Milligram per kilogram
MINS	Mare Island Shipyard

## **ACRONYMS AND ABBREVIATIONS (Continued)**

---

NAVSTA TI	Naval Station Treasure Island
Navy	U.S. Department of the Navy
NEPA	National Environmental Policy Act
NFA	No further action
NOAA	National Oceanic and Atmospheric Administration
PAH	Polycyclic aromatic hydrocarbon
PCB	Polychlorinated biphenyl
pCi/L	Picocurie per liter of air
PMO	Program Management Office
PRC	PRC Environmental Management, Inc.
PWC	Navy Public Works Center
Radian	Radian International LLC
RASO	Radiological Affairs Support Office
RI	Remedial investigation
SEBS	Supplemental environmental baseline survey
Shaw	Shaw Environmental, Inc.
SSPORTS	Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment Vallejo
SWDIV	U.S. Department of the Navy, Naval Facilities Engineering Command, Southwest Division
Tetra Tech	Tetra Tech EM Inc.
TI	Treasure Island
TIDA	Treasure Island Development Authority
TSCA	Toxic Substances Control Act
U&A	Uribe & Associates
USC	<i>United States Code</i>
USFWS	U.S. Fish and Wildlife Service
UST	Underground storage tank
Water Board	San Francisco Bay Regional Water Quality Control Board
WESTDIV	U.S. Department of the Navy, Naval Facilities Engineering Command, Western Division
YBI	Yerba Buena Island

Note: Acronyms used only once will not be defined in the acronym list.

## 1.0 PURPOSE

This finding of suitability to transfer (FOST) documents that certain parcels of real property comprising part of Naval Station Treasure Island (NAVSTA TI) are environmentally suitable for transfer by deed under Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), in a manner protective of human health and the environment. This FOST has been prepared in accordance with U.S. Department of Defense (DoD) guidance for the environmental review process to reach a FOST (DoD 1994a).

This FOST report was prepared under the Indefinite Quantity Contract for Architectural-Engineering Services to Provide CERCLA/RCRA/UST Studies No. N68711-03-D-5104, Contract Task Order 034. Under this contract, SulTech (a joint venture of Sullivan Consulting Group and Tetra Tech EM Inc. [Tetra Tech]) provides technical support to the U.S. Department of the Navy (Navy), Base Realignment and Closure (BRAC) Program Management Office (PMO) West, for the former NAVSTA TI in San Francisco, California.

The sections below summarize the site background, the organization of the FOST report, and the documents reviewed to prepare this FOST report.

## 1.1 INTRODUCTION

NAVSTA TI was included for closure under the Base Closure and Realignment Act of 1993 and was operationally closed in 1997. NAVSTA TI is in the San Francisco Bay, at mid-span of the San Francisco-Oakland Bay Bridge (Bay Bridge). [Figure 1](#) shows the location of NAVSTA TI. NAVSTA TI property to be disposed of consists of approximately 88.6 acres of dry land on Yerba Buena Island (YBI), a natural island; 366 acres of dry land on Treasure Island (TI), an artificial island; and approximately 547 acres of surrounding submerged lands. This FOST report focuses on the approximately 77 acres of dry land on YBI. [Figure 2](#) shows the YBI transfer parcel.

Petroleum contamination in groundwater and soil and polychlorinated biphenyl (PCB) releases from electrical transformers are the only ongoing environmental issues within the YBI transfer parcel. Under CERCLA, the federal government must warrant that all remedial action necessary to protect human health and the environment has been completed with respect to CERCLA hazardous substances prior to transfer of properties by deed. However, the definition of CERCLA hazardous substances does not include petroleum products or derivatives. As a result, remediation and regulatory closeout of petroleum-contaminated sites can be conducted in parallel with, and subsequent to, property transfer. Similarly, while PCBs are considered a CERCLA hazardous substance, the existing PCB leaks from electrical transformers inside buildings within the FOST parcel are not likely to result in a release to the environment and will be addressed pursuant to the Toxic Substances Control Act (TSCA). To expedite property transfer and redevelopment activities, the YBI transfer parcel will be transferred before corrective actions for petroleum and PCB contamination and regulatory closures are completed. This FOST report addresses potential human health and environmental risks that may exist from exposure to petroleum and PCB contamination at the YBI transfer parcel (1) under current conditions, and (2) while the petroleum and PCB corrective actions are ongoing.

[Section 8.0](#) presents the conveyance conditions and notifications necessary to prevent risk to human health or the environment.

## **1.2 ORGANIZATION OF THE FINDING OF SUITABILITY TO TRANSFER**

This FOST report is organized into the following sections.

- [Section 1.0](#), Purpose—discusses the purpose of the FOST report, the organization of the FOST report, the site background, and the documents reviewed to prepare this FOST report.
- [Section 2.0](#), Property Description—summarizes the geographic extent of the transfer parcel.
- [Section 3.0](#), Regulatory Coordination—summarizes the regulatory history of the YBI transfer parcel.
- [Section 4.0](#), National Environmental Policy Act (NEPA) Considerations—discusses the disposal and reuse of the YBI transfer parcel in accordance with requirements of NEPA.
- [Section 5.0](#), Environmental Condition of Property (ECP) Area Type—classifies the YBI transfer parcel into ECP area types.
- [Section 6.0](#), Environmental Factors—summarizes environmental factors, resources, and conditions that require deed notification or restrictions, and those that do not require deed notification or restrictions.
- [Section 7.0](#), Proposed Reuse—describes the reuse plan for the YBI transfer parcel that was identified by the Navy in the “Final Environmental Impact Statement” ([Navy 2003](#)) and reviewed during the preparation of this FOST.
- [Section 8.0](#), Conveyance Conditions and Notifications—describes the notices and restrictions for transfer of the transfer parcel.
- [Section 9.0](#), Finding of Suitability to Transfer—presents the signed statement that the YBI transfer parcel is suitable for transfer.
- [Appendix A](#) represents the responses to regulatory and public comments received on this FOST. There were no comments received from the regulators or public that were left unresolved.

### 1.3 DOCUMENTS REVIEWED

This FOST is based on a comprehensive review of information contained in the following documents, presented in chronological order. Specific information from relevant documents in the list below is cited in the text.

#### 1980s

- Navy. 1986. “Natural Resources Management Plan, Treasure Island Naval Station, San Francisco, California.” Prepared by Western Division, Naval Facilities Engineering Command (WESTDIV). July.
- Environmental Resources Management-West Inc. (ERM-West). 1987. “Tank (Underground Storage Tank [UST] 57) Testing Study, Naval Station Treasure Island.” Prepared for WESTDIV. July.
- Dames and Moore. 1988. “Final Preliminary Assessment/Site Inspection of Naval Station Treasure Island.” Prepared for Naval Energy and Environmental Support Activity. April.
- ERM-West. 1989. “Report on Abandoned Underground Storage Tank [UST 57] Investigation at Naval Station Treasure Island, Treasure Island, California.” Prepared for WESTDIV. April.

#### 1990

- PRC Environmental Management, Inc. (PRC). 1990. “Underground Storage Tank [UST 270] Removal.” Final Report. Prepared for WESTDIV. July 20.
- Navy. 1990. “San Francisco Base Closure and Realignment Pre-Final Environmental Impact Statement.” Prepared by WESTDIV. October.

#### 1991

- Navy. 1991. “Environmental Compliance and Protection Manual.”
- PRC. 1991. “Site Inspection Report [Sites 8, 19 and 25].” Prepared for WESTDIV. April 26.
- National Oceanic and Atmospheric Administration (NOAA). 1991. “Distribution and Abundance of Fishes and Invertebrates in West Coast Estuaries, Volume 2, Species Life History Summaries.” NOAA Estuarine Living Marine Resources Program. August.

## 1992

- U.S. Fish and Wildlife Service (USFWS). 1992. “Status and Trends Report on Wildlife of the San Francisco Estuary.” Prepared under U.S. Environmental Protection Agency (EPA) Cooperative Agreement CE-009519-01-0 by the USFWS for the San Francisco Estuary Project. January.
- Radian International LLC (Radian). 1992a. “Solid Waste Management Program for Naval Station Treasure Island, Draft.” Prepared for WESTDIV. January 24.
- PRC. 1992. “Underground Storage Tank Content Sampling Laboratory Summary Report.” Prepared for WESTDIV. January 30.
- Radian. 1992b. “Hazardous Waste Management Plan for Naval Station Treasure Island, Draft.” Prepared for WESTDIV. July.
- California Environmental Protection Agency (Cal EPA) Department of Toxic Substances Control (DTSC). 1992. “Federal Facility Site Remediation Agreement for Treasure Island Naval Station.” September 29, 1992.
- Hieb, K. 1992. “Fish, Shrimp and Crab Catch Data Collected in Delta Outflow, San Francisco Study.” Prepared for Bay Delta Special Water Projects Division. California Department of Fish and Game. December.

## 1993

- PRC. 1993. “Draft Phase I Remedial Investigation (RI) Report, NAVSTA TI.” Prepared for WESTDIV. November.
- USFWS. 1993. “Proposed Endangered and Threatened Species and Candidate Species That May Occur in the Area of the Proposed Closure of NAVSTA TI.” Unpublished Transmission to WESTDIV. December 31.

## 1994

- DoD. 1994a. “DoD Guidance on the Environmental Review Process to Reach a FOST for Property Where Release or Disposal Has Occurred.”
- DoD. 1994b. “DoD Guidance on the Environmental Review Process to Reach a FOST for Property Where No Release or Disposal Has Occurred.”
- DoD. 1994c. “Procedures to Determine Environmental Suitability for Leasing Property Available as a Result of a Base Closure or Realignment.”
- DoD. 1994d. “Asbestos, Lead-Based Paint (LBP), and Radon Policies at BRAC Properties.”

- PRC. 1994. "Draft Summary Report of UST [UST 111, 169] Removals, Naval Station Treasure Island, San Francisco, California." January 20.
- Navy. 1994. "Environmental and Natural Resources Program Manual." November 1.

## 1995

- Navy Public Works Center (PWC). 1995a. "Pest Management Plans 1987 - 1995, Naval Station Treasure Island, California." San Francisco Bay.
- Navy. 1995a. "Naval Facilities Engineering Command Environmental Baseline Survey (EBS) Guidance."
- Radian. 1995. "Oil and Hazardous Substance Spill Prevention Control and Countermeasure Plan." January 1.
- Shawnee. 1995a. "Interim Draft Report, Assessment of Suspected Underground Storage Tanks, Naval Station Treasure Island, California." January 27.
- PRC. 1995a. "Base Realignment and Closure Cleanup Plan, Revision 01." March 1.
- Navy. 1995b. Letter Regarding Radiological Affairs Support Office (RASO) Clearance of Radiological Issues of Concern for NAVSTA TI. From Lieutenant Commander Heron, Naval Facilities Engineering Command, Engineering Field Activity West (EFA WEST). To Mr. David Wang, DTSC. March 8.
- PRC. 1995b. "Phase II Ecological Risk Assessment (ERA) Final Work Plan and Field Sampling Plan, NAVSTA TI." Prepared for EFA WEST. April.
- PWC. 1995b. "Polychlorinated Biphenyl Electrical Equipment Survey, NAVSTA TI." San Francisco Bay. May.
- ERM-West. 1995a. "Basewide EBS Report for NAVSTA TI." May 19.
- EPA. 1995. "Aerial Photographic Analysis of NAVSTA TI." June 5.
- Shawnee. 1995b. "Final Report Assessment of Suspect USTs, NAVSTA TI." June 6.
- Subsurface Consultants, Inc. 1995. "Geotechnical Investigation Closure of Inactive Fuel Pipelines NAVSTA TI." June 20.
- ERM-West. 1995b. "Tank Assessment Reports for Former UST Sites." July 1.
- Mare Island Naval Shipyard (MINS). 1995. "Final Asbestos Survey Report, NAVSTA TI." December.

## 1996

- DoD. 1996a. "Fast Track Cleanup at Closing Installations." February.
- MINS. 1996. "Historical Study of Yerba Buena Island, Treasure Island and Their Buildings." March 1.
- ERM-West. 1996a. "Final EBS Sampling Work Plan for NAVSTA TI." April.
- PRC. 1996a. "Phase II ERA Final Work Plan and Field Sampling Plan, Naval Station Treasure Island." Prepared for EFA WEST. April 1.
- San Francisco Bay Regional Water Quality Control Board (Water Board). 1996. "San Francisco and Northern San Mateo County Pilot Beneficial Use Designation Project Part I: Draft Staff Report." Water Board Groundwater Committee. April 4.
- Radian. 1996. "Oil and Hazardous Substance Spill Prevention Control and Countermeasure Plan." April 18.
- PWC. 1996a. "Lead Management Plan FY 1917 (Quarters 60, 61 and 66)." San Francisco Bay. May.
- PWC. 1996b. "Lead Management Plan Quarters 1-9 Housing, Naval Station Treasure Island, California." Norfolk. May.
- PWC. 1996c. "Lead Management Plan FY 1934 (Quarters 105, 109, 111 and 113)." San Francisco Bay. May.
- PWC. 1996d. "Lead Management Plan Quarters 240." San Francisco Bay. May.
- PWC. 1996e. "Lead Management Plan Townhouse Multiplex." San Francisco Bay. May.
- PWC. 1996f. "Asbestos Management Plan, Quarters 1-9 Housing, Naval Support Activity Treasure Island, San Francisco, California." San Francisco Bay. May 1.
- PWC. 1996g. "Asbestos Management Plan, FY-1934 (105, 106, 109, 111, 113, 115) Housing, Naval Support Activity Treasure Island, San Francisco, California." San Francisco Bay. May 1.
- PWC. 1996h. "Asbestos Management Plan, FY-1917 (60, 61, 66) Housing, Naval Support Activity Treasure Island, San Francisco, California." San Francisco Bay. May 1.
- PWC. 1996i. "Asbestos Management Plan, Townhouse Multiplex Housing (300's), Naval Support Activity Treasure Island, San Francisco, California." San Francisco Bay. May 1.

- PWC. 1996j. “Asbestos Management Plan, Quarters 240 Multiplex Housing, Naval Support Activity Treasure Island, San Francisco, California.” San Francisco Bay. May 1.
- PWC. 1996k. “Asbestos Management Plan, Quarters 10 and 62 Housing, Naval Support Activity Treasure Island, San Francisco, California.” San Francisco Bay. May 1.
- Ecology and Environment, Inc. 1996. “Storm Drain Cleaning Project Phase I and II, 1995-1996, Naval Station Treasure Island, Public Works Center San Francisco, Final Summary Report.” June 1.
- San Francisco Redevelopment Agency. 1996. “A NAVSTA TI Reuse Plan Public Review Draft.” Prepared by the Office of Military Base Conversion, Planning Department and the San Francisco Redevelopment Agency. June 3.
- PRC. 1996b. “Technical Memorandum Estimation of Background and Ambient Metal Concentrations in Soil at NAVSTA TI.” Prepared for EFA WEST. June 19.
- ERM-West. 1996b. “Preliminary Investigation of Suspected USTs (UST 213) at Naval Station Treasure Island, San Francisco, California.” July.
- Water Board. 1996. Letter Regarding UST Case Closure (Tanks 1B, 1C, 1D, 1F, 2A, 2D, 111, 169, 180A, 180B, 330C, 330D), NAVSTA TI. From Loretta K. Barsamian, Executive Officer, Water Board. To Baha Zarah, Engineering Field Activity West (EFA WEST). July 22.
- DoD. 1996b. *BRAC Cleanup Plan Guidebook*. Fall.
- Tetra Tech, Inc. 1996. “Underground Storage Tank Closure Report, U.S. Coast Guard Station.” September 1.
- PRC. 1996c. “Draft RI Report, NAVSTA TI, San Francisco, California.” Prepared for EFA WEST. October.
- Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment Vallejo (SSPORTS). 1996. “LBP Sampling and Analysis, Quarters 1, NAVSTA TI, San Francisco California.” November.
- PRC. 1996d. “Approach to Development of Petroleum Cleanup Goals Protective of the San Francisco Bay.” Prepared for EFA WEST. December 15.
- Navy. 1996. “Summary of the Closure-in-Place of Eleven Underground Home Heating Oil Tanks at Yerba Buena Island, NAVSTA TI, San Francisco, California.” December 31.

## 1997

- U.S. Department of Housing and Urban Development (HUD). 1997. "Guidelines for the Evaluation and Control of LBP Hazards in Housing."
- DoD. 1997a. "Responsibility for Additional Environmental Cleanup after Transfer of Real Property."
- JRP Historical Consulting Services. 1997. "Cultural Resource Inventory and Evaluation Investigations: Yerba Buena Island and Treasure Island, NAVSTA TI." March.
- Navy. 1997a. "UST Removal Summary Report for Tanks 248-A, 248-B, 257, Quarters 8, 180-D and 180-E, Treasure Island." March.
- PRC. 1997a. "Base Realignment and Closure Cleanup Plan, NAVSTA TI, San Francisco, California." Prepared for EFA WEST. March.
- Navy. 1997b. "Final Summary Report for Closure in Place of Underground Home Heating Oil Tanks at NAVSTA TI, San Francisco, California." March 1.
- PWC. 1997. "List of Oil Filled Electrical Equipment for NAVSTA TI." San Francisco Bay. March 6.
- Radian. 1997. "Asbestos Survey Summary of 141 Buildings for NAVSTA TI." May.
- Tetra Tech, Inc. 1997. "Final Report, Locate Abandoned Fuel Lines." May.
- PRC. 1997b. "Final Groundwater Status Report: Summary of Groundwater Monitoring from November 1995 to September 1996, Naval Station Treasure Island, San Francisco, California." Prepared for EFA WEST. May 23.
- DTSC. 1997. Letter regarding Analysis of CERCLA Constituent Analysis at Sites Designated Petroleum-Only, NAVSTA TI, San Francisco, California. From Daniel E. Murphy, P.E., Chief, Closing Bases Unit, Office of Military Facilities. To Ms. Shin-Roei Lee, Leader, Department of Defense Section, Water Board. June 20.
- PRC and Uribe & Associates (U&A). 1997. "Final Site-Specific Environmental Baseline Survey for Reuse Zone 3, NAVSTA TI, San Francisco, California." Prepared for EFA WEST. September.
- PRC. 1997c. "Final Finding of Suitability to Lease Reuse Zone 3A Parcels YB001 through YB003, a Portion of YB004, YB005 through YB013, YB015, YB016, A Portion of YB017, Portion of YB019, YB020 through YB023." Prepared for EFA WEST. September.
- PRC. 1997d. "Draft Final Onshore RI Report, NAVSTA TI, San Francisco, California." Prepared for EFA WEST. September.

- Water Board. 1997. Letter Regarding UST Case Closure (Tanks 8 [Qtr 8, QR08], 230, 257, 180D, 180E), NAVSTA TI, San Francisco, California. From Richard McMurtry, Groundwater Protection and Waste Containment Division Chief, Water Board. To John Pfister, Navy, EFA WEST. October 3.
- Tetra Tech and U&A. 1997. "EBS Sampling and Analysis Summary Report (YB03, YB20), NAVSTA TI, San Francisco, California." Prepared for EFA WEST. November 17.
- DoD. 1997b. "Base Reuse Implementation Manual." December.
- PRC. 1997e. "Offshore Ecological Risk Assessment Chemistry and Biological Data Presentation." Prepared for EFA WEST. December 17.

## 1998

- Laidlaw Environmental Services, Inc. 1998. Letter Regarding Tank Cleaning of Aboveground Storage Tank at Building 520. From Laidlaw Environmental Services, Inc. To Edward Castner, Navy PWC, San Francisco Bay. January 29.
- Tetra Tech. 1998a. "Validation Study for Sites 11, 28 and 29, Final Work Plan/Field Sampling Plan, NAVSTA TI, San Francisco Bay." Prepared for EFA WEST. February 23.
- Tetra Tech. 1998b. "BRAC Cleanup Plan, NAVSTA TI, San Francisco, California." Revision 04. Prepared for EFA WEST. March.
- Allied Technology Group, Inc. (ATG). 1998a. "Asbestos Abatement/Repair Buildings: 1, 7, 29, 34, 41, 62, 91, 96, and 227; Quarters 2, 5, 6, 7, Townhouses 327 A & B at Treasure Island." March 1.
- Cal, Inc. 1998. "Closure Report, Removal of Inactive Fuel Lines, NAVSTA TI." May.
- Tetra Tech and U&A. 1998. "Final Site-Specific EBS for Reuse Zone 6, Yerba Buena Island, NAVSTA TI, San Francisco, California." Prepared for EFA WEST. July.
- ATG. 1998b. "Closure Report, Asbestos Abatement/Repair Buildings: 1, 92, 99, 107, 114, 130, 131, 140, 157, 201, 202, 215, 216, 217, 229, 230, 233, 257, 258, 260, 261, 264, 271, 290, 293, 330, 335, 342, 343, 346, 355, 401, 402, 445, 449, 450, 453, 461, 469 and Quarters 62 at TI." August.
- SSPORTS. 1998a. "Asbestos Remediation Report For Nonresidential Miscellaneous Facility Buildings." August.
- Forensic Analytical Specialties. 1998a. "XRF (x-ray fluorescence) Survey for Lead-based Paint, 36 Residential and 27 Non-Residential Units, Yerba Buena Island, San Francisco, California." August 27.

- Forensic Analytical Specialties. 1998b. “LBP Risk Assessment, 36 Residential and 5 Non-residential Units, Yerba Buena Island, San Francisco, California.” September 11.
- ATG. 1998c. “NAVSTA Treasure Island Asbestos Remediation for Phase II Abatement for 38 Facility Buildings.” October.
- Tetra Tech. 1998c. “Technical Memorandum, Bird Survey Results for the Validation Study for Sites 11, 28 and 29.” Prepared for EFA WEST. October 9.
- SSPORTS. 1998b. “Asbestos Building Survey Report for Miscellaneous Facility Buildings and Underground Steam Utility Lines at TI and YBI Vol. 1; Asbestos Building Survey Report for Residential Housing Unites at Treasure Island and Yerba Buena Island, Vol. II.” November.

## 1999

- AFA Construction, Inc. 1999a. “Mid-Yard Soil Sample Results, Non-Historic and Pre-1960 Housing, NAVSTA TI, San Francisco, California.” January 5.
- Tetra Tech and U&A. 1999a. “EBS Sampling and Analysis Summary Report [for Parcels YB003 and YB020], NAVSTA TI, San Francisco, California.” Prepared for Naval Facilities Engineering Command, Southwest Division (SWDIV). January 8.
- AFA Construction, Inc. 1999b. “Drip Line Soil Results, Non-Historic and Pre-1960 Housing, NAVSTA, San Francisco, California.” January 22.
- IT Corporation (IT Corp.). 1999. “Work Plan, Contractor Quality Control Plan, Health and Safety Plan, Removal Action of Lead Contaminated Soil-Building Units 1207 and 1209.” June.
- Tetra Tech and U&A. 1999b. “Draft Phase IIa Transfer Area Supplemental EBS, NAVSTA TI, San Francisco, California.” Prepared for SWDIV. June 9.
- ACC Environmental Consultants. 1999a. Letter regarding Lead Clearance Report, Yerba Buena Island, Naval Station, Building 105A and 105B, San Francisco. From ACC Environmental Consultants. To Mr. Phillip Yates, IT Corporation. June 30.
- ACC Environmental Consultants. 1999b. Letter regarding Lead Clearance Report, Yerba Buena Island, Naval Station, Building 109A and 109B, San Francisco. From ACC Environmental Consultants. To Mr. Phillip Yates, IT Corporation. June 30.
- ERM-West. 1999. “Final UST Investigation Report for UST 270.” August.

- SSPTS. 1999a. “Asbestos Remediation Report for Residential Housing Units (Vol. 1) and Nonresidential Facility Buildings (Vol. 2) at TI and YBI.” August.
- SSPTS. 1999b. “Field Summary Report – LBP in Soil Abatement Action at 60 Yerba Buena, 66 Yerba Buena, 113 Forest, and Playground #5, DoD Housing, NAVSTA TI, San Francisco, California.” September.
- ACC Environmental Consultants. 1999c. Letter Regarding Lead Clearance Report, Yerba Buena Island, Naval Station, Building 66, San Francisco. From ACC Environmental Consultants. To Mr. John McGwire, IT Corporation. September 21.
- ACC Environmental Consultants. 1999d. Letter Regarding Lead Clearance Report, Yerba Buena Island, Naval Station, Building 106A, 106B, San Francisco. From ACC Environmental Consultants. To Mr. John McGwire, IT Corporation. September 21.
- ACC Environmental Consultants. 1999e. Letter Regarding Revised Lead Clearance Report, Yerba Buena Island, Naval Station, Building 109A and 109B, San Francisco. From ACC Environmental Consultants. To Mr. John McGwire, IT Corporation. September 21.
- ACC Environmental Consultants. 1999f. Letter Regarding Lead Clearance Report, Yerba Buena Island, Naval Station, Building 113A and 113B, San Francisco. From ACC Environmental Consultants. To Mr. John McGwire, IT Corporation. September 21.
- ACC Environmental Consultants. 1999g. Letter Regarding Lead Clearance Report, Yerba Buena Island, Naval Station, Building 115A and 115B, San Francisco. From ACC Environmental Consultants. To Mr. John McGwire, IT Corporation. September 21.
- DoD. 1999. “Interim Final LBP Guidelines for Disposal of DoD Residential Real Property – A Field Guide.” December.

## 2000

- DoD. 2000. “LBP Policy for Disposal of Residential Real Property.” January.
- DTSC. 2000. “Memorandum of Agreement between the US Department of the Navy and the California Department of Toxic Substances Control.” March 10.
- Treasure Island Development Authority (TIDA). 2000. “Final Report Economic Development Conveyance Application and Business Plan for NAVSTA TI.” June 19.

## 2001

- Water Board. 2001. Letter regarding Concurrence that Groundwater at NAVSTA TI, San Francisco, Meet the Exemption Criteria in the State Water Resources Control Board Sources of Drinking Water Resolution 88-63. From Curtis Scott, Division Chief, Groundwater Protection and Waste Containment Division, Water Board. To Ann Klimek, Environmental Business Line Team Leader, Southwest Division, Naval Facilities Engineering Command. January 23.
- IT Corp. 2001a. "Final Field Sampling Plan, LBP and Lead in Soil Abatement at Yerba Buena Island." July 10.
- Federal Highway Administration (FHWA). 2001. "Department of Transportation, Federal Highway Administration, Record of Decision, San Francisco-Oakland Bay Bridge East Span Seismic Safety Project." July 11.
- Tetra Tech. 2001a. "Groundwater Status Report: Summary of Groundwater Monitoring April through October 2000." Volumes 1 and 2. Prepared for SWDIV. August.
- Bureau of Environmental Health Management. 2001. Letter Regarding UST Closure Approval, Building 66, Yerba Buena Island, NAVSTA TI, San Francisco, California. From Sue Cone, Program Manager, Bureau of Environmental Health Management. To Doug Nelson, IT Corp, Project Manager. September 5.
- Tetra Tech. 2001b. "Fuel Lines and Utilities Map, NAVSTA TI, San Francisco, California." Prepared for SWDIV. November.
- IT Corp. 2001b. "Final Project Plans, Pilot-Scale Remediation, Coast Guard Site [UST 270], NAVSTA TI, San Francisco, California." November.
- IT Corp. 2001c. "Final Supplemental Project Plans, Site YF1 Remedial Excavation, NAVSTA TI Petroleum Remedial Excavation Program, Yerba Buena Island, San Francisco, California." December 7.
- Tetra Tech. 2001c. "Final RI Offshore Sediments Operable Unit, NAVSTA TI, San Francisco, California." Prepared for SWDIV. December 28.

## 2002

- IT Corp. 2002a. "Final Field Activity Report Building 66 Lead Contaminated Soil Remediation." March 11.
- Tetra Tech. 2002a. "Final Groundwater Status Report: Summary of Groundwater Monitoring from March through October 2000, NAVSTA TI, San Francisco, California." Prepared for NAVSTA TI. March 28.

- Mendelian Construction, Inc. 2002. “Final Report Treasure Island/Yerba Buena Island Asbestos Removal.” May 13.
- Navy. 2002a. Letter Requesting Concurrence with No Further Action of Home Heating Oil Tanks at Yerba Buena Island, NAVSTA TI, San Francisco, California. From Ellen Casados, Remedial Project Manager, SWDIV. To Sarah Raker, Water Board. July 15.
- IT Corp. 2002b. “Final Field Activity Report Building 240 Lead Contaminated Soil Remediation.” July 15.
- Water Board. 2002a. Letter Regarding Concurrence on Request for No Further Action, Home Heating Oil Tanks, Yerba Buena Island, NAVSTA TI, San Francisco (Tanks 1, 2, 3, 4, 5, 6, 7, 9, 10, 62, 240). From Sarah Raker, Associate Engineering Geologist, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. July 23.
- Tetra Tech. 2002b. “Environmental Closeout Strategy/Schedules, NAVSTA TI, San Francisco, California.” Prepared for SWDIV. August.
- Navy. 2002b. “Navy Environmental and Natural Resources Program Manual.” Change Transmittal 3. October 17.
- Water Board. 2002b. Letter Regarding Closure Letter for DoD USTs [UST 66] at NAVSTA TI, San Francisco California. From Loretta Barsamian, Executive Officer, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. October 23.
- IT Corp. 2002c. “Final Post-Construction Summary Report, Site YF1 Remedial Excavation, NAVSTA TI, Petroleum Remedial Excavation Program, Yerba Buena Island, San Francisco, California.” November 18.
- IT Corp. 2002d. “Final Post-Construction Summary Report Building 66 Remedial Excavation, NAVSTA TI, Petroleum Remedial Excavation Program, Yerba Buena Island, San Francisco, California.” December 11.

## 2003

- Navy and California State Historic Preservation Officer. 2003. “Memorandum of Agreement Between the Department of the Navy and the California State Historic Preservation Officer For the Layaway, Caretaker Maintenance, Interim Leasing, Sale, Transfer, and Disposal of Historic Properties on the Former Naval Station, Treasure Island, San Francisco, California.” January 1.
- Architectural Systems Corp. 2003. “LBP Abatement, Nimitz Complex, NAVSTA TI, San Francisco, California.” January 29.

- Water Board. 2003a. Letter Regarding Concurrence on No Further Action, Causeway Pipeline Removal, NAVSTA TI, San Francisco. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. March 11.
- Shaw Environmental, Inc. (Shaw). 2003. "Final Sampling and Analysis Plan Addendum Environmental Baseline Survey Data Gaps Investigation, NAVSTA TI, San Francisco, California." June 26.
- Navy. 2003. "Final Environmental Impact Statement." Prepared by SWDIV. June 27.
- Tetra Tech. 2003a. "Final Groundwater Status Report: Summary of Groundwater Monitoring from May 2001 through August 2002, NAVSTA TI, San Francisco, California." Prepared for SWDIV. August 18.
- Water Board. 2003b. Letter Regarding Concurrence on Request for No Further Action, USTs 57 and 234, NAVSTA TI, San Francisco, California. From Sarah Raker, Associate Engineering Geologist, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. September 5.
- Tetra Tech. 2003b. "Final Facilitywide UST Summary Report, NAVSTA TI, San Francisco, California." Prepared for SWDIV. October.
- Tetra Tech. 2003c. "Final Groundwater Status Report: Summary of Groundwater Monitoring from May through December 2002, NAVSTA TI, San Francisco, California." Prepared for SWDIV. November 19.
- Tetra Tech. 2003d. "Final Inactive Fuel Line Corrective Action Plan, NAVSTA TI, San Francisco, California." Prepared for SWDIV. December.
- Water Board. 2003c. Letter Regarding Concurrence on Request for No Further Action, Suspected USTs (Tanks 3A, 3B, 368C, 450, 452, 453, 461, M, 7, 145, 180F, 180G, 267, FF8, 213, 262), NAVSTA TI, San Francisco, California. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. December 2.

## 2004

- Shaw. 2004a. "Final Technical Memorandum Recommendations for Polycyclic Aromatic Hydrocarbons at Petroleum Program Sites, NAVSTA TI." January 8.
- Water Board. 2004a. Letter Regarding Concurrence on Final Corrective Action Plan, Inactive Fuel Lines, NAVSTA TI, San Francisco. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. February 10.

- Water Board. 2004b. Letter Regarding Case Closure Letter for DoD USTs at NAVSTA TI, including USTs 201 and 270. From Bruce H. Wolfe, Executive Director, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. February 10.
- Science Applications International Corporation, PAR Environmental Services, Inc., and Far Western Anthropological Research Group, Inc. 2004. "Final Archaeological Test Excavations at Yerba Buena Island, NAVSTA TI, San Francisco, California." March.
- Shaw. 2004b. "Closure Report Site 16 Clipper Cove Tank Farm Request for No Further Action, Final." April 27.
- Shaw. 2004c. "Final Technical Memorandum, Additional Investigation at Environmental Baseline Study and Petroleum Program Sites, NAVSTA TI." April 29.
- Sullivan Consulting Group. 2004. "Final Groundwater Status Report: Summary of Groundwater Monitoring at Sites 11, 12, 21, and 24 (May through December 2003)." Prepared for SWDIV. May 1.
- Shaw. 2004d. "Final Post-Construction Summary Report, UST Sites 140, 221, and 230, Naval Station Treasure Island, Petroleum Remedial Excavation Program, TI and YBI, San Francisco, California." May 6.
- Shaw. 2004e. "Final Post-Construction Summary Report, UST Sites 204, 237, and 238, NAVSTA TI, Petroleum Remedial Excavation Program, TI and YBI, San Francisco, California." May 24.
- Shaw. 2004f. "Final Post-Construction Summary Report Site YF2, NAVSTA TI, Petroleum Remedial Excavation Program." June 2.
- Shaw. 2004g. "Final Technical Memorandum Additional Investigation at EBS and Petroleum Program Sites at NAVSTA TI." June 11.
- Water Board. 2004c. Letter Regarding Concurrence on Request for No Further Action, Inactive Fuel Line YF2, NAVSTA TI, San Francisco, California. From Sarah Raker, Associate Engineering Geologist, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. June 17.
- Water Board. 2004d. Letter Regarding Concurrence on Request for No Further Action, USTs 204 (A-D) and 237, NAVSTA TI, San Francisco, California. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. June 17.

- Water Board. 2004e. Letter Regarding Concurrence on Request for No Further Action, USTs 140, 221, and 230, NAVSTA TI, San Francisco, California. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. June 17.
- Water Board. 2004f. Letter Regarding Concurrence on No Further Action, Site 16, NAVSTA TI, San Francisco. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. June 17.
- Shaw. 2004h. “Sampling and Analysis Plan (Field Sampling Plan/Quality Assurance Project Plan), Excavation of Lead-Contaminated Soil at Officers Quarters 1 through 7, and Building 62, YBI, NAVSTA TI Island, San Francisco, California.” June 21.
- Tetra Tech. 2004a. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with La Rae Landers, Lead Remedial Project Manager, BRAC PMO West. Conducted by Campbell Merrifield, Tetra Tech. June 25.
- Tetra Tech. 2004b. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Jerry Busch, Navy, Project Leader, Real Estate Group. Conducted by Campbell Merrifield, Tetra Tech. June 25.
- SulTech. 2004a. “Final Environmental Closeout Strategy and Schedules for NAVSTA TI, San Francisco, California.” Prepared for BRAC PMO West. July 30.
- Tetra Tech. 2004c. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Michael Mentink, TI Caretaker’s Site Office. Conducted by Patrick Callahan, Tetra Tech. August 9.
- Shaw. 2004i. “Final Facilitywide UST Summary Report Update, NAVSTA TI, San Francisco, California.” Revision 1. August 25.
- Tetra Tech. 2004d. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with James Sullivan, BRAC Environmental Coordinator, BRAC PMO West. Conducted by Campbell Merrifield, Tetra Tech. September 14.
- Tetra Tech. 2004e. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Scott Anderson, Remedial Program Manager, BRAC PMO West. Conducted by Campbell Merrifield, Tetra Tech. September 14.
- Tetra Tech. 2004f. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Virginia St. Jean, San Francisco Certified Unified Program Agency Representative, NAVSTA TI. Conducted by Campbell Merrifield, Tetra Tech. September 30.

- Innovative Technical Solutions, Inc. (ITSI). 2004. “Final LBP Reevaluation Report for Yerba Buena Island Housing, Former NAVSTA TI, San Francisco, California.” October 1.
- Tetra Tech. 2004g. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Reginald Hairston, John Stewart Company. Conducted by Campbell Merrifield, Tetra Tech. October 1.
- Tetra Tech. 2004h. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Sherry Williams, Treasure Island Homeless Development Initiative. Conducted by Campbell Merrifield, Tetra Tech. October 1.
- Tetra Tech. 2004i. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Steve Chan, Job Corps. Conducted by Campbell Merrifield, Tetra Tech. October 1.
- Tetra Tech. 2004j. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Mark McDonald, TIDA, Environmental Affairs. Conducted by Campbell Merrifield. October 4.
- Tetra Tech. 2004k. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Vic Zerzynski, San Francisco Public Utilities Commission Hetch Hetchy. Conducted by Campbell Merrifield, Tetra Tech. October 7.
- Tetra Tech. 2004l. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Steven Edde, ITSI. Conducted by Campbell Merrifield, Tetra Tech. October 17.
- Sullivan Consulting Group and Tetra Tech. 2004. “Draft PCB Summary Report, Former Naval Station Treasure Island, San Francisco, California.” November.
- Navy. 2004a. NAVSTA TI Remedial Project Manager and Base Realignment and Closure Cleanup Team (BCT) Meeting Minutes, and Attachment 5, LBP in Soil at Residential and Non-Residential Buildings, NAVSTA TI. November 2.
- Navy. 2004b. “Former NAVSTA TI Historical Radiological Assessment Fact Sheet No. 1.” November 18.
- Tetra Tech. 2004m. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Charles Smith, California Department of Transportation (Caltrans). Conducted by Campbell Merrifield, Tetra Tech. November 30.

- SulTech. 2004b. “Revised Draft Site 27 Feasibility Study, NAVSTA TI, San Francisco, California.” Prepared for BRAC PMO West. December 1.

## 2005

- Shaw. 2005a. “Final Field Activity Report, Environmental Baseline Survey Data Gaps Investigation, NAVSTA TI, San Francisco, California.” February 22.
- Navy. 2005a. Letter Regarding Results of Historical Radiological Assessment for the FOST Areas, Former NAVSTA TI. From Jim Whitcomb, Remedial Project Manager, Former NAVSTA TI. To NAVSTA TI BCT. March 1.
- Navy. 2005b. “Site 13 Record of Decision.” April 7.
- Shaw. 2005b. “Field Activity Report: Lead-based Paint Abatement Action at Quarters 1-7, and 10 and Buildings 62, 83, 205, and 230.” May 30.
- SulTech. 2005. “Final Supplemental EBS, NAVSTA TI, San Francisco, California.” Prepared for BRAC PMO West. July 8.
- Navy. 2005c. “National Environmental Policy Act Record of Decision.” October 26.

## 2006

- Weston Solutions, Inc. 2006. “Final Treasure Island Naval Station Historical Radiological Assessment, Former Naval Station Treasure Island, San Francisco, California.” February 10.

## 2.0 PROPERTY DESCRIPTION

NAVSTA TI is in the San Francisco Bay, at mid-span of the Bay Bridge (Interstate 80) in San Francisco Bay, as shown on [Figure 1](#). [Figure 2](#) shows the property available for transfer under this FOST, which is referred to as the “YBI transfer parcel.”

The YBI transfer parcel, located along the southwest portion of YBI, includes portions or all of the following environmental baseline survey (EBS) parcels: YB001 through YB009, and YB011 through YB024 (see [Figure 2](#)). The YBI transfer parcel comprises approximately 77 acres. There are 49 buildings present within the transfer parcel. [Table 1](#) lists the individual EBS parcels within the YBI transfer parcel. Former and potential future land uses of individual buildings within EBS parcels are discussed in the supplemental EBS (SEBS), which summarizes the status of the buildings on each parcel ([SulTech 2005](#)). Utilities in the YBI transfer parcel include steam lines, sanitary sewer lines, storm drain lines, and electric, water, and natural gas lines.

### 3.0 REGULATORY COORDINATION

NAVSTA TI is not on EPA's National Priorities List; therefore, it is not subject to a Federal Facility Agreement (FFA). A similar agreement, called a Federal Facility Site Remediation Agreement (FFSRA), was executed between the Navy and the California Environmental Protection Agency (Cal EPA), including the Cal EPA Department of Toxic Substances Control (DTSC) and the San Francisco Bay Regional Water Quality Control Board (Water Board), on September 29, 1992 (DTSC 1992). This legal agreement defines the Navy's corrective action and response action obligations under the Resource Conservation and Recovery Act (RCRA) and CERCLA for the 33 CERCLA sites identified at NAVSTA TI. Since 1993, the BRAC Realignment and Closure Cleanup Team (BCT) has coordinated environmental cleanup and closure activities at NAVSTA TI, including preparation of the basewide EBS (ERM-West 1995a) and supplemental EBSs (SulTech 2005). The BCT consists of representatives from the Navy, EPA, and DTSC; the Water Board is an advisory regulatory authority overseeing groundwater issues. Figure 3 shows the current investigation sites at YBI. No active CERCLA investigation sites are within the YBI transfer parcel. Petroleum sites within the YBI transfer parcel are managed under the Petroleum Program and are described in Section 6.1.

In January 2003, the BCT was notified of the initiation of this FOST; however, the document was subsequently delayed pending completion of additional PCB, lead-based paint (LBP), and radiological investigations.

### 4.0 NATIONAL ENVIRONMENTAL POLICY ACT CONSIDERATIONS

In accordance with the requirements of NEPA, the Navy prepared an Environmental Impact Statement (EIS) to evaluate the proposed disposal and reuse of NAVSTA TI (Navy 2003). A NEPA record of decision was signed on October 26, 2005 (Navy 2005c).

### 5.0 ENVIRONMENTAL CONDITION OF PROPERTY AREA TYPE

The ECP of the YBI transfer parcel based on the presence of hazardous substances and petroleum products has been characterized in numerous documents during environmental management activities at NAVSTA TI. Section 1.3 lists the major decision documents relevant to activities within the parcels. Specifically, results of the basewide EBS (ERM-West 1995a), as amended by the supplemental EBS (SulTech 2005), assisted the Navy in identifying properties that are suitable for transfer.

Subsequent to the publication of the SEBS, the partial parcels in the YBI FOST were cleared of radiological issues through the final historical radiological assessment (HRA) (Weston Solutions, Inc. 2006, Navy 2005a).

The DoD provides guidelines on the classification of base property into one of seven ECP area types to help support reuse and transfer of base property (DoD 1996b). The ECP area type of a property reflects its suitability for transfer, with ECP Area Types 1 through 4 being suitable for

transfer by deed. At NAVSTA TI, ECP area types are assigned to individual parcels of land known as EBS parcels. The basewide EBS initially established the boundaries and numbering scheme for the EBS parcels at NAVSTA TI (ERM-West 1995a). Since 1995, the original number of parcels has been modified to include submerged lands that will be disposed of by the Navy. Figure 2 shows the EBS parcel numbers and boundaries contained within the YBI transfer parcel, along with their ECP area types.

The seven ECP area types, as defined in the *BRAC Cleanup Plan Guidebook* (DoD 1996b), are summarized below.

- **Area Type 1.** Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).
- **Area Type 2.** Areas where only release or disposal of petroleum products has occurred.
- **Area Type 3.** Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.
- **Area Type 4.** Areas where release, disposal, and/or migration of hazardous substances has occurred, and all remedial actions necessary to protect human health and the environment have been taken.
- **Area Type 5.** Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are under way, but all required remedial actions have not yet been taken.
- **Area Type 6.** Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.
- **Area Type 7.** Areas that are not evaluated or require additional evaluation.

All EBS parcels identified in this FOST are wholly or partially contained within the YBI transfer parcel and have been classified as ECP Area Types 1, 2, 3, or 4. If the EBS parcel is not wholly located within the YBI transfer parcel, the environmental locations of concern within the transfer parcel were classified as ECP Area Types 1, 2, 3, or 4 in accordance with the supplemental EBS (SulTech 2005). The ECP area type for each EBS parcel or portion of EBS parcel located in the YBI transfer parcel is presented in Table 1 and shown on Figure 2.

## 6.0 ENVIRONMENTAL FACTORS

The documents listed in [Section 1.3](#) were reviewed to identify environmental factors and resources present at the YBI transfer parcel that may warrant restrictions. [Section 6.1](#) discusses environmental factors and resources that require deed notifications or restrictions. [Section 6.2](#) discusses environmental factors that do not constitute a threat to human health or the environment and, as a result, do not require deed restrictions or notifications.

### 6.1 ENVIRONMENTAL FACTORS THAT WARRANT RESTRICTIONS AND/OR REQUIRE NOTIFICATION

This section identifies environmental factors that may warrant restrictions or require notifications.

#### 6.1.1 Asbestos-Containing Material

Both EPA and the Occupational Safety and Health Administration regulate asbestos. Asbestos is identified in Section 112 of the Clean Air Act as a hazardous air pollutant (Title 42 of the *United States Code* [USC] Section 7412). In regulations adopted pursuant to the Clean Air Act, EPA has established standards for the renovation and demolition of asbestos-containing material (ACM) (Title 40 of the *Code of Federal Regulations* [CFR] Part 61). Protection measures for asbestos workers, such as permissible exposure levels and monitoring requirements, are set forth in the Occupational Safety and Health Act, Title 29 CFR Part 1910.1001.

DoD policy for ACM is to (1) manage ACM in a manner protective of human health and the environment, and (2) comply with all applicable federal, state, and local laws and regulations governing hazards from ACM ([DoD 1994d](#)). Therefore, unless it is determined by competent authority that ACM at the property poses a threat to human health at the time of transfer, all property containing ACM will be conveyed, leased, or otherwise transferred “as is” through the BRAC process.

ACM is abated before property transfer only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time the property is transferred. This abatement may be accomplished by the active service organization, by the service disposal agent, or by the transferee under a negotiated requirement of the contract for sale or lease. The abatement discussed above will not be required when (1) the buildings are scheduled for demolition by the transferee, and (2) the transfer document prohibits occupation of the buildings before demolition, and (3) the transferee assumes responsibility for the management of any ACM in accordance with applicable laws ([DoD 1994d](#)).

As a general matter, the Navy will perform asbestos surveys when a building, structure, or facility is scheduled for reuse or its status is unknown. The Navy is not required to conduct a survey in buildings that are designated for demolition. For buildings, structures, or facilities that will be reused, ACM will be abated before property disposal (or as a condition of transfer) only if it is of a type and condition that is not in compliance with applicable laws, regulations, and

standards, or if it poses a threat to human health at the time of transfer of the property (that is, if it is friable, accessible, and damaged [FAD] ACM). This abatement will be performed by the Navy or by the transferee under a negotiated requirement of the property transfer. Occupancy or use of buildings, structures, or facilities with FAD ACM will be restricted until abatement has been completed.

Buildings, structures, or facilities that are to be demolished may be occupied on an interim basis only if the transferee conducts the necessary ACM surveys and abatements in accordance with all local, state and federal requirements. The transferee will assume responsibility for management of any ACM, including surveys, removal, and management of ACM before or during demolition, in accordance with applicable laws.

Table 2 provides available information collected from surveys on the existence, extent, and condition of ACM at buildings, structures, or facilities within the YBI transfer parcel. Pipe wrap of steam pipes located in buildings and in utility trenches may also contain ACM, although selective sampling in 1995 failed to locate any ACM associated with steam pipes at YBI (Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia [SSPORTS] 1998b). The information presented in Table 2 identifies if asbestos is present in the building and if it was identified as friable. The documents reviewed were either survey reports that identify the presence of asbestos or reported abatement activities undertaken at buildings where friable asbestos was identified. The SEBS provides a more comprehensive discussion of ACM in buildings within the YBI transfer parcel (SulTech 2005).

FAD ACM was identified in 24 buildings within the YBI transfer parcel and abated (Allied Technology Group [ATG] 1998a, 1998b, 1998c; SSPTS 1998a, 1998b, 1999a; Mendelian Construction, Inc. 2002). During the 2004 visual site inspections for the SEBS, no FAD ACM was observed in buildings within the YBI transfer parcel (SulTech 2005). The deed will contain notification (see Section 8.1.2) and restriction (see Section 8.2.9) pertaining to ACM remaining on the YBI transfer parcel. No ACM was identified in the following buildings: 66, 105, 106, 109, 111, 113, 115, and 274, and Quarters 3.

### **6.1.2 Underground Storage Tank 66**

The 1988 preliminary assessment/site inspection report mentioned the possibility that an underground storage tank (UST) was adjacent to Building 66 (Dames and Moore 1988). The UST was discovered during a remedial excavation near Building 66 to remove petroleum hydrocarbon-impacted surface soils. The UST discovered during the excavation is located underneath a concrete structure retaining wall. Because of the location of the tank and the steepness of the hillside behind Building 66, UST 66 was closed-in-place (Table 3). Although no restrictions were identified in the corrective action plan (CAP) or Closure Report, the Navy determined the site requires a restriction based on residual petroleum contamination.

The Water Board submitted a closure letter concurring with no further action (NFA) for UST 66 to the Navy in October 2002 (Water Board 2002b). UST 66, located within the YBI transfer parcel, requires a notice and restriction to be put in place at the time of transfer (see

[Sections 8.1.4 and 8.2.7](#)). No other UST sites in the FOST parcel contain residual petroleum contamination that require restrictions.

### **6.1.3 Petroleum Program**

Although the Navy intends to obtain regulatory closure for all sites under the petroleum program, the YBI transfer parcel will likely be transferred before the Navy obtains regulatory closure for some petroleum sites. Transfer while petroleum remediation is ongoing is allowable under CERCLA because Section 101(14) excludes crude oil and fractions of crude oil, including the hazardous substances such as benzene that are constituents of those petroleum substances, from the definition of a hazardous substance. CERCLA otherwise requires completion of response actions before transfer for substances included in the definition of CERCLA hazardous substances (unless an early transfer is approved). Although the YBI transfer parcel may be transferred before the Navy obtains regulatory closure of the petroleum sites, the Navy will ultimately remain obligated to complete the regulatory closeout of the remaining petroleum sites. Because petroleum and petroleum-related constituents are not included in the definition of hazardous substances under CERCLA (42 USC 9601[14]), petroleum constituents are being remediated under the 1994 California UST regulation (Title 23 *California Code of Regulations* [CCR], Division 3, Chapter 16, Article 11 Section 2720), which addresses releases to soil and groundwater from former USTs. The Navy may fulfill the petroleum obligation by completing regulatory closeout under Navy direction or by requiring the transferee to complete these actions on behalf of the Navy as part of a negotiated transfer agreement.

A CAP site in the YBI transfer parcel includes portions of the inactive fuel line Site YF3. [Figure 3](#) shows the locations and boundaries of the site. The status of this site is discussed in the 2005 supplemental EBS ([SulTech 2005](#)); corrective action and regulatory closure are pending at Site YF3 following completion of the new eastern span of the Bay Bridge; however, this site requires a notice and restriction that there will be no disturbance of the site until regulatory closure is achieved and associated monitoring wells are abandoned for the portion of the site that is within the YBI transfer parcel. [Section 8.1.5](#) discusses this notice and [Section 8.2.6](#) discusses these restrictions.

At NAVSTA TI, the potential for contamination to migrate from inactive fuel line sites through groundwater and storm and sanitary sewers was evaluated in association with the CAP Program ([Tetra Tech 2003d](#)). Remediation and monitoring results indicated that storm and sanitary sewers are not preferential pathways for migration of petroleum within the YBI transfer parcel. No restrictions are considered necessary for the storm and sanitary sewer systems. Restrictions are needed for groundwater within the YBI transfer parcel at Inactive Fuel Line Site YF3 until regulatory closure because additional soil and groundwater investigations are required where free product may be present. [Section 8.2.8](#) discusses restrictions on use and disturbance of groundwater within the inactive fuel line Site YF3, until NFA concurrence is received.

### **6.1.4 Lead-Based Paint**

Before transferring the YBI transfer parcel, the DoD is required to disclose known LBP and LBP hazards. LBP hazards are defined in the Federal Residential Lead-Based Paint Hazard Reduction

Act of 1992 (Title X of Public Law 102-550), as codified in Title 42 USC Section 4822, as “any condition that causes exposure to lead...that would result in adverse health effects.” Lead exposure is especially harmful to young children and pregnant women. Neither Title X nor DoD policy (DoD 2000) requires LBP inspections or assessments for structures not defined as residential property, target housing, or child-occupied facilities. The act defines “target housing” as any housing constructed before 1978, except any housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing for the elderly or persons with disabilities) or any zero-bedroom dwelling.

Title X defines LBP hazard control measures (interim controls) as “a set of measures designed to reduce temporarily human exposure or likely exposure to lead-based paint hazards, including specialized cleaning, repairs, maintenance, painting, temporary containment, ongoing monitoring of lead-based paint hazards or potential hazards, and the establishment and operation of management and resident education programs.” Title X defines LBP abatement as any set of measures designed to permanently eliminate LBP hazards. EPA and U.S. Department of Housing and Urban Development (HUD) consider permanent LBP hazard control measures as those that last at least 20 years (DoD 1999). LBP hazards identified during the original risk assessment conducted on the pre-1960 YBI residential buildings have been addressed through either hazard control measures or abatement.

The following sections and Table 4 summarize the history of the Navy’s management of LBP on the YBI transfer parcel and specific notifications and restrictions on the presence of LBP in some of the buildings, structures, or facilities situated within the YBI transfer parcel.

#### **6.1.4.1 Residential Housing**

The Navy policy (DoD 2000) for residential buildings, structures, and facilities is contained in the joint DoD and EPA interim final guidance, *Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property – A Field Guide* (DoD 1999). The guidance applies specifically to “target housing.” The guidance further requires that federally owned residential real property scheduled for transfer be subject to:

- Inspection, risk assessment, and abatement of LBP hazards (LBP, soil and dust) in target housing constructed prior to 1960.
- Inspections and risk assessment for target housing constructed between 1960 and 1978.

Additional requirements in the EPA and DoD guide related to LBP include:

- LBP inspections and risk assessments must be performed for all target housing prior to transfer.
- Risk assessments must be performed within 12 months of the date of transfer, and any abatement required must be conducted no later than 12 months after the completion of the risk assessment.

- The responsibility for abatement may be assumed by the transferee through the transfer agreement.
- Soil lead hazards surrounding target housing constructed between 1960 and 1978 will be abated by the Navy or will be abated by the transferee as part of the transfer agreement.
- Potential soil-lead hazards (bare soils with lead concentrations between 400 to 2,000 parts per million (ppm), excluding children's play areas), will be evaluated for the need for abatement, interim controls or no action; the level of action will be determined by the LBP risk assessment.
- For child-occupied buildings, structures, and facilities (i.e., day care centers, preschools) on residential real property that will be reused as child occupied buildings, structures, and facilities after transfer, the Navy will evaluate for LBP hazards, and either abate or require any hazards identified to be abated by the transferee prior to reuse as a child occupied facility.
- Target housing that will be demolished and redeveloped as residential real property following transfer will be evaluated by the transferee for soil-lead hazards after demolition of the existing target housing units. Abatement of any soil-lead hazards will be conducted by the transferee prior to occupancy of any newly constructed dwellings.

Prior to transferring the property, the Navy is required to document evaluation results by disclosing known LBP and/or LBP hazards and referencing the evaluation results in the FOST and transfer agreement or transfer documents for residential buildings/structures/facilities.

Residences within the YBI transfer parcel consist of both leased units and unleased/unoccupied units. All residential buildings constructed on YBI have been assessed for risk from LBP in the interior, exterior, and soil in accordance with HUD and joint DoD/EPA guidance (DoD 1999). All pre-1960 residential buildings have been abated and/or hazard control measures are in place on the interiors and exteriors of the buildings, and if required, the soil has been abated. Hazard control measures have included encapsulation of interior/exterior LBP surfaces on pre-1960 residential buildings within the FOST parcel. All leased post-1960 to pre-1978 residential structures on YBI have been assessed for risk from LBP before they were leased to the City of San Francisco. The results of the soil assessment conducted for the post-1960 to pre-1978 residential structures on YBI were below the HUD and EPA criterion and did not require abatement. All references for the risk assessments and abatements can be found on Table 4.

A reevaluation of LBP at all residential buildings on YBI was conducted in April and May 2004 (Innovative Technical Solutions, Inc. [ITSI] 2004). The process of a LBP reevaluation is (1) review records to identify locations of LBP; (2) visually determine if there is deteriorated LBP; and (3) collect composite wipe samples to determine if hazardous lead dust levels exist. Assessment of LBP control treatments used on interiors, exteriors, and common areas known to contain LBP were part of the reevaluation; however, assessment of lead in soils was not part of the reevaluation (ITSI 2004). All LBP hazards identified during the 2004 reevaluation in the

leased pre-1960 residential buildings either have been or will be abated and/or hazard control measures applied by the Treasure Island Development Authority (TIDA) per the lease agreement, and TIDA must give notice of LBP hazards to residents of the post-1960 buildings per the Finding of Suitability to Lease agreement and HUD guidelines ([PRC Environmental Management, Inc. \[PRC\] 1997c](#), [Tetra Tech and U&A 1998](#), Title X HUD). LBP hazards identified during the 2004 reevaluation on the exterior of the unleased pre-1960 residential buildings had hazard control measures applied in December 2005. Any new LBP hazards identified in the pre-1960 residential buildings during the reevaluation to support property transfer will require abatement and/or hazard control measures and will be made a condition of the property transfer before the buildings can be occupied ([DoD 1999](#)).

The lead-contaminated soil at Quarters 1 through 7 and 10, and Buildings 62, 66, 83, 205, 230, and 240 has been abated to be protective of residential use of the buildings in accordance with Title X using HUD guidelines and joint DoD/EPA guidance ([DoD 1999](#)). In addition, the Navy has exceeded HUD and joint DoD/EPA guidance by addressing LBP in soil around Quarters 1 through 7 and 10. Soil removal activities have removed soil to a minimum of 2 feet below ground surface (bgs), and most of the excavations have been conducted to depths of 3 to 4 feet bgs based on confirmation sampling ([Shaw 2005b](#)). Soil under hardscape (buildings, foundations, sidewalks, and driveways) at Quarters 1 through 7 and 10 is not required to be abated to be protective of residential use of the buildings in accordance with Title X using HUD guidelines and joint DoD/EPA guidance ([DoD 1999](#)). Both a notice and restriction are required. The restriction will require that hardscape must be managed and maintained, and in the event of the removal of hardscape surrounding Quarters 1 through 7 and 10, would require investigation of soils beneath hardscape as required by local, state and federal regulations.

#### **6.1.4.2 Nonresidential Buildings**

Legislation and national policy on LBP have focused on residences and on buildings, structures, or facilities where children may be present on a regular basis to address the risk of adverse health effects to children from LBP exposure. As a result, DoD policy does not require LBP surveys for commercial or industrial buildings unless the buildings will be reused for residential purposes ([DoD 2000](#), [DoD 1999](#)). However, LBP may be present on interior and exterior surfaces because many nonresidential buildings on YBI were constructed before 1978. In the event such properties will be reused as residential properties, the transferee will be required to renovate the buildings in accordance with regulatory requirements for abatement of LBP hazards. [Table 4](#) lists all nonresidential structures within the boundary of the YBI transfer parcel that were constructed before 1978. A notice will be included in the deed to advise the transferee of the potential existence of LBP on these buildings within the YBI transfer parcel.

Notifications and restrictions for both residential and nonresidential buildings located within the YBI transfer parcel are included in [Sections 8.1.3 and 8.2.5](#).

### 6.1.5 Polychlorinated Biphenyls

Pursuant to the TSCA, Title 15 USC 2605(e), EPA has adopted regulations that pertain to the use, marking, storage, and disposal of PCBs and certain PCB-containing equipment (Title 40 CFR Part 761). PCBs are also potentially subject to regulation as hazardous waste under state law (Title 22 CCR Section 66261.24[a][2]). Restrictions on the disposal of PCB wastes are set forth in Title 22 CCR Section 66268.110.

The Navy was required to inventory or validate annually all activities that generated, treated, stored, or disposed of PCBs, in accordance with Navy procedures and federal and state regulations (Navy 1994). Navy guidelines specified that all transformers containing 500 milligrams per kilogram (mg/kg) or more of PCBs must be eliminated by October 1998 and that all transformers containing 50 mg/kg or more of PCBs must be eliminated by October 2003 (Navy 1994).

The Navy initiated a program in the 1980s to identify PCB-contaminated electrical equipment at NAVSTA TI, such as high voltage primary transformers with dielectric fluid that may contain PCBs. In the mid-1980s, six PCB transformers containing 500 mg/kg or greater of PCBs were removed from sites within the YBI transfer parcel at NAVSTA TI (ERM-West 1995a).

In 1995, Navy Public Works Center (PWC) completed a survey of the remaining 190 high-voltage electric transformers and oil circuit breakers that included sampling and analysis for PCBs (PWC 1995b). Table 5 identifies the current and former electrical equipment present in the YBI transfer parcel documented in the PWC survey and basewide EBS. The 1995 EBS documented the presence or former presence of transformers with dielectric fluid that may have contained PCBs (ERM-West 1995a). The 1995 EBS documented spills and stains potentially related to PCBs (ERM-West 1995a).

In 2004, additional samples around and on locations of electrical equipment were collected at the YBI transfer parcel for analysis of PCBs to assess the possible presence of transformer leaks or spills, as shown on Figure 3. As a result, two areas were identified within the boundary of the YBI transfer parcel with PCB concentrations slightly above the high but below the low occupancy criterion (concentrations between 1 mg/kg and 25 mg/kg), as shown on Figure 3. The two PCB sites inside buildings (118 [6585265] and 200 [TX-252]) are not likely to result in a release to the environment (Sullivan Consulting Group and Tetra Tech 2004). Both a notice and restriction are required because the two indoor sites identified as TX-252 (in Building 200) and 6585265 (in Building 118) have not received regulatory closure and the analytical results do not meet the TSCA criterion for high occupancy. The sites require a land use restriction to limit use to low occupancy within the meaning of TSCA. Sections 8.1.6 and 8.2.10 present the notification and restriction, respectively, required for the PCB sites. If the Navy determines that additional remedial activities are appropriate, these activities will be performed before transfer.

## 6.2 ENVIRONMENTAL FACTORS THAT WARRANT NO RESTRICTIONS

This section discusses sites within the YBI transfer parcel with environmental factors that do not pose a threat to human health or the environment and, as a result, do not require deed restrictions or notifications. For example, stains inside buildings observed during the 2005 SEBS are considered de minimus conditions that warrant no constraints.

### 6.2.1 Radon

Radon is a colorless and odorless radioactive gas produced by radioactive decay of naturally occurring uranium to radium, which is present in high concentrations in rocks containing uranium, granite, shale, phosphate, and pitchblende. Radon that enters the atmosphere is diluted to insignificant concentrations; however, radon that is present in soil can enter buildings and accumulate to concentrations that may increase the risk of cancer in persons who inhale the radon.

Radon is measured in picocuries per liter of air (pCi/L). In the United States, the average indoor level of radon is estimated to be 1.3 pCi/L and the average outdoor level of radon is about 0.4 pCi/L. EPA has made testing and abatement recommendations for both housing and schools. As part of the “Indoor Radon Abatement” provisions in TSCA, the head of each federal department or agency that owns a federal building is required to conduct a study to evaluate the extent of radon contamination in such buildings (Title 15 USC Section 2669).

In 1989, the Navy implemented a radon assessment and mitigation program, consisting of (1) an initial screening phase to identify housing projects, schools, daycare facilities, barracks, hospitals, and brigs with elevated radon levels; (2) collecting samples from buildings in which elevated levels of radon gas were found during the initial screening phase; and (3) performing corrective actions in buildings with elevated radon levels. In 1991, the Navy conducted radon screening of representative residential locations at NAVSTA TI, including EBS parcels YB004, YB018, and YB019 in the YBI transfer parcel. Results of the radon screening at the residential locations were presented in the basewide EBS ([ERM-West 1995a](#)). Results of the radon screening on YBI indicated radon was below the detection limit of 0.5 pCi/L in 17 samples, and ranging from detections at 0.5 pCi/L to 2.0 pCi/L in nine additional samples. No radon was detected at concentrations exceeding the EPA radon action level of 4 pCi/L; therefore, no further action was required for radon at NAVSTA TI ([DoD 1997a](#)).

### 6.2.2 Radiological Activities

During the basewide EBS, the Navy reviewed on-site records and searched for additional information on known and potential uses of radiological contaminants at NAVSTA TI ([ERM-West 1995a](#), [Navy 1995b](#)). Based on a 1995 survey and a subsequent historical radiological assessment conducted by Radiological Affairs Support Office (RASO) in 2004 and 2005, no structures within the YBI transfer parcel were identified as radiologically impacted; therefore, no further action is required for radiological materials within the YBI Transfer Parcel ([Weston Solutions, Inc. 2006](#), [Navy 2005a](#)).

### 6.2.3 Groundwater

No active, inactive, or abandoned monitoring and extraction wells are located within the YBI transfer parcel.

Groundwater recharge at YBI occurs primarily from infiltration of precipitation, with some contribution from landscape irrigation. Perched groundwater conditions may exist locally as a result of the presence of relatively impermeable silt and clay lenses. Groundwater within the areas of investigation under the facilitywide groundwater monitoring program has been identified as brackish and, because of the small volume of fresh groundwater available, potentially prone to saltwater intrusion (Water Board 1996; PRC 1997a). With regard to the groundwater investigations under the facilitywide groundwater monitoring program, the principal beneficial uses of interest are groundwater replenishment of surface water bodies (San Francisco Bay) and related protection and use of estuarine habitats. There are no restrictions on groundwater, except for the previous restriction at Site YF3 as discussed in Section 6.1.3.

### 6.2.4 Storm Sewers

All surface water at YBI is drained into the surrounding bay by natural drainage pathways or through the storm sewer system. The storm sewer system provides a pathway to San Francisco Bay for potential contamination originating from operations on YBI. Additionally, in areas of poor piping condition, it is possible that surrounding soil and groundwater contamination could leach or leak into the storm sewer system, potentially causing contaminants to be transported into San Francisco Bay. Sediments in the storm sewer system at YBI were identified as potentially contaminated with metals, pesticides, polycyclic aromatic hydrocarbons (PAH), and petroleum hydrocarbons. Storm sewers were investigated in association with Site 13, the storm water outfalls, and sediment in San Francisco Bay (Tetra Tech 2001c).

During the first phase of sampling for the Offshore OU remedial investigation (RI), the Ecological Risk Assessment (ERA), at NAVSTA TI, chemicals of potential ecological concern were identified using data collected during the storm water investigation for drainage areas served by each storm water outfall (PRC 1997e). Based on the results of the storm water investigation, additional data were collected to further characterize the sources, extent, and potential toxicity of chemicals in offshore sediments (Tetra Tech 2001c). Sampling focused on tracking contaminants from onshore sources to off-shore sediments through storm water outfalls. Both on-shore sediment present in catch basins and off-shore outfalls during storm events were sampled. Offshore sampling during the second phase of the RI was more comprehensive and included chemical analysis of sediments and pore water, invertebrate bioassays, and tissue residue analysis (Tetra Tech 2001c). Because the Phase II sampling was conducted after the NAVSTA TI storm drain system was cleaned in 1996, Phase II data were considered to be more representative of the current conditions of offshore sediments; therefore, the Phase II data were given more weight in the ERA than Phase I data. Additionally, the approximate locations where samples were collected during Phase I were resampled during Phase II. Based on the information and data collected in the two phases and evaluated in the Offshore OU RI, the chemicals of potential ecological concern do pose a risk to ecological receptors but that risk is not at a level that requires remedial action. No further investigation or

action was recommended for the Site 13 offshore areas (Tetra Tech 2001c). A no-further-action record of decision was signed April 7, 2005 (Navy 2005b).

### **6.2.5 Installation Restoration Program**

Work under the Installation Restoration Program (IRP) was initiated at NAVSTA TI in the 1980s and has continued to the present. Thirty-three IRP sites were identified basewide: 26 IRP sites were identified during the preliminary assessment/site inspection conducted in 1988 (Dames and Moore 1988), 3 IRP sites were identified prior to the subsequent Phase II RI, and 4 IRP sites were identified between 2002 and 2004 (SulTech 2004a). Of the 33 sites, 3 sites (Site 16, 18 and 23) are within the YBI transfer parcel, as shown on Figure 3.

Site 16 was moved out of the CERCLA program and into NAVSTA TI's petroleum program because site investigations determined only petroleum constituents at Site 16 required a response action (see Section 6.2.7). Because petroleum and petroleum-related constituents are not included in the definition of hazardous substances under CERCLA (Title 42 USC 9601[14]), petroleum constituents at Site 16 were remediated under the 1994 California UST regulation (Title 22 CCR 11, 2720), which address releases to soil and groundwater from former USTs, aboveground storage tanks (AST), and inactive fuel lines. A closure report was submitted in May 2004 (Shaw 2004b), and regulatory concurrence with NFA was received June 17, 2004 (Water Board 2004f).

Two IRP Sites are partially within the YBI transfer parcel: Site 18, Asbestos Covered Piping (EBS Parcel YB018), and Site 23, YBI Line Break (EBS Parcel YB003). Sites 18 and 23 were removed from consideration for further action after they were initially identified during the preliminary assessment/site inspection (Dames and Moore 1988). Site 18 encompassed the area where it was reported that in the early 1980s a landslide on YBI exposed piping insulated with asbestos; however, no information was found to confirm this report. Any asbestos is currently buried with the lines, and the possibility that the lines will be damaged or exposed during routine maintenance is low, given the nature of operations at YBI; therefore, Site 18 was not recommended for further action (Dames and Moore 1988).

Site 23 encompassed the area where a landslide in the 1980s also reportedly ruptured a pipeline that transported oil. As a result of the steep topography and movement of the landslide, the area of distribution of oil is presumed high and the concentration of released oil is low. Therefore, Site 23 was not recommended for further action (Dames and Moore 1988). Based on the findings and recommendations of the Preliminary Assessment/Site Inspection, Sites 18 and 23 are not expected to pose a threat to soil or groundwater on the YBI transfer parcel.

Although both Sites 18 and 23 are recommended for no further action in the 1988 preliminary assessment/site inspection report, both sites were re-considered by the BCT when EBS data gaps were being identified, and the BCT agreed again that no further action was necessary at these sites.

## 6.2.6 Aboveground Storage Tanks

Inspections for spills and stains surrounding the 23 ASTs within the YBI transfer parcel were conducted as part of the 1995 EBS (ERM-West 1995a). Table 3 lists the ASTs within the YBI transfer parcel at NAVSTA TI. Figure 3 shows the known locations of the ASTs within the YBI transfer parcel; former tanks, or former tanks associated with former buildings that cannot be specifically placed, are sometimes identified as a part of a parcel instead of a specific location. Additional tanks may not be shown on Figure 3 because historic information does not provide enough detail for placement on the figure. None of the ASTs within the YBI transfer parcel showed evidence of any releases requiring investigation under the petroleum program.

## 6.2.7 Petroleum Program

Petroleum program and UST sites with no notifications or restrictions required are discussed in this section. Petroleum program and UST sites requiring notifications or restrictions are discussed in Section 6.1.3.

The YBI transfer parcel includes petroleum CAP Site 16 as shown on Figure 3. Remediation efforts completed at Site 16 were detailed in a closure report (Shaw 2004b), and regulatory concurrence with NFA was received June 17, 2004 (Water Board 2004f).

The inactive fuel line CAP sites in the YBI transfer parcel include portions or all of Sites YF1, YF2, and the Causeway Pipeline that do not require notifications or restrictions. Figure 3 shows the locations and boundaries of these sites, which were investigated under the Petroleum and Petroleum Inactive Fuel Line Programs. A closure report for all inactive fuel lines at NAVSTA TI was prepared and requested no further action (Tetra Tech 2003d). Site YF1 received concurrence with NFA on February 10, 2004 (Water Board 2004a). The Water Board requested further investigation of Site YF2 because of concerns about PAHs detections (Water Board 2004a). Further investigations of PAHs at YF2 resulted in the Navy's recommendation that no remedial actions were necessary (Shaw 2004f). Site YF2 received concurrence with NFA on June 17, 2004 (Water Board 2004c). The Causeway Pipeline site received concurrence with NFA on March 11, 2003 (Water Board 2003a). These sites do not require notices or restrictions.

In addition to the inactive fuel line sites, the YBI transfer parcel also includes various UST sites, of which all but one site do not require notices or restrictions because the tanks were removed or closed in place.

The Navy has investigated USTs in the YBI transfer parcel. As USTs were closed and corrective actions were completed, closure reports were prepared for the former USTs and submitted for review and regulatory concurrence (Tetra Tech 2003b; Shaw 2004i). For this FOST, reports of UST investigations and closure activities at NAVSTA TI were reviewed. In addition, historical drawings, correspondence, and other related documents were reviewed to provide a summary of UST closure activities at the YBI transfer parcel.

[Table 3](#) presents an inventory of known and suspected USTs within the YBI transfer parcel, as well as their tank identification numbers, recorded contents, and current regulatory closure status. All of the USTs were likely used to store petroleum products; however, the former contents of some tanks (such as UST 221) remain unknown. [Figure 3](#) shows the locations of all USTs in the transfer parcel on YBI.

Sixteen suspected USTs were identified within the boundaries of the YBI transfer parcel. Investigations for this FOST classified the suspected tanks in one of the following two categories: (1) tanks that have been located and (2) tanks believed to have been removed or abandoned ([Shaw 2004i](#)). The classifications of the suspected USTs within the YBI transfer parcel are discussed below.

1. **Tanks that have been located.** This category includes the following UST sites, which were located and approved for closure by the Water Board in the years noted: USTs 111 and 169 in 1996 ([Water Board 1996](#)); UST 66 in 2002 ([Water Board 2002b](#)); home heating oil USTs at Quarters 1-7, 10, 62, and 240 in 2002 ([Water Board 2002a](#)); UST 57 in 2003 ([Water Board 2003b](#)); and UST 221 in 2004 ([Water Board 2004e](#)).
2. **Tanks believed to have been removed or abandoned.** This category includes one suspected UST 230 that is suspected to have existed, but was removed previously or may have been abandoned. The Navy received concurrence from the Water Board that NFA was required for UST 230 ([Water Board 2004e](#)).

UST 66 (discussed further in [Section 6.1.2](#)), located within the YBI transfer parcel, requires a notice and restriction to be put in place at the time of transfer, (see [Sections 8.1.4 and 8.2.7](#)). The remaining UST sites do not require notices or restrictions because they have been closed by the Water Board.

### 6.2.8 Adjacent Properties

This section discusses the potential for contamination from IRP and petroleum program sites located on adjacent properties to affect the YBI transfer parcel. These sites are being investigated and corrective actions are being taken, as appropriate. The FFSRA provides the schedule for completion of these investigations and corrective actions ([DTSC 1992](#)); completion of corrective actions for these sites is expected by 2010. Except for petroleum releases identified in [Section 6.1.3](#), no potential sources of contamination from adjacent properties were identified as affecting the YBI transfer parcel. The following documents were reviewed to assess potential sources of contamination on adjacent properties.

- “Basewide EBS Report for NAVSTA TI” ([ERM-West 1995a](#))
- “Draft Final Onshore RI Report, NAVSTA TI, San Francisco, California” ([PRC 1997d](#))

- “Final Inactive Fuel Line CAP, NAVSTA TI, San Francisco, California” ([Tetra Tech 2003d](#))
- “Final Technical Memorandum, Additional Investigation at EBS and Petroleum Program Sites at NAVSTA TI” ([Shaw 2004c](#))
- “Final Facilitywide UST Summary Report Update, NAVSTA TI, San Francisco, California, Revision 01” ([Shaw 2004i](#))
- “Final LBP Reevaluation Report for Yerba Buena Island Housing, Former NAVSTA TI, San Francisco, California” ([ITSI 2004](#))
- “Draft PCB Summary Report, Former NAVSTA TI, San Francisco, California” ([Sullivan Consulting Group and Tetra Tech 2004](#))
- NAVSTA TI Remedial Project Manager and BCT Meeting Minutes, and Attachment 5, LBP in Soil at Residential and Non-Residential Buildings, NAVSTA TI ([Navy 2004a](#))
- Letter Regarding Results of Historical Radiological Assessment for the FOST, Former NAVSTA TI. From Jim Whitcomb, Remedial Project Manager, SWDIV. To NAVSTA TI BCT ([Navy 2005a](#))
- Weston Solutions, Inc. 2006. “Final Treasure Island Naval Station Historical Radiological Assessment, Former Naval Station Treasure Island, San Francisco, California.” February. ([Weston Solutions, Inc. 2006](#)).
- “Final Supplemental EBS, NAVSTA TI, San Francisco, California” ([SulTech 2005](#))

Based on the document review, the sites discussed below are not potential sources of contamination to the YBI transfer parcel (see [Figure 3](#)). Fugitive dust transported by natural causes was eliminated as a potential hazard to the YBI transfer parcel based on the lack of surface soil contamination in exposed bare soils. The four IRP sites that are adjacent (within 0.25 mile) to the YBI transfer parcel include Site 08 (EBS Parcel YB024), Site 11 (EBS Parcel YB025), Site 28 (EBS Parcels YB001 and YB010), and Site 29 (EBS Parcels YB016 and YB017). Each of these sites is discussed below.

Site 08, the Army Point Sludge Disposal Area (see [Figure 3](#)), was used for approximately 8 years between 1968 and 1976, for disposal of sludge from the wastewater treatment plant on TI. Surface soil on Site 08 is possibly contaminated by lead and other metals because of vehicle emissions from the Bay Bridge and ramp painting and maintenance, or sludge disposal. Other contaminants of potential concern are pesticides. California Department of Transportation (Caltrans) has been collecting data during pre-excavation and post-excavation phases of bridge construction from 2001 through 2004. An RI report is currently being prepared for Sites 08, 28, and 29. It is unlikely Site 08 will affect the YBI transfer parcel.

Site 11, the YBI Landfill, is located in the Federal Highway Administration (FHWA) fee area and U.S. Coast Guard area (see [Figure 3](#)). Site 11 was identified as a dump in 1935. Buried debris was observed during a site visit in 1994, indicating that landfilling had occurred in the area. Further trenching in March 2002 revealed construction and metal debris. Additional sources of contamination include five USTs and an inactive fuel line. In 2003 USTs 270 and 204A through 204D were removed (see [Table 3](#)). The USTs and inactive fuel line were investigated under the petroleum program. The contaminants of potential concern identified during investigations and closure activities at the UST sites included total petroleum hydrocarbons, PAHs, volatile organic compounds, and metals ([Shaw 2004d](#)). Concurrence with NFA for USTs 204 A-D and for UST 270 was received from the Water Board on June 17 and February 10, 2004, respectively ([Water Board 2004b, 2004d](#)). Based on the most recent results for groundwater monitoring, the direction of groundwater flow at Site 11 is generally southeast, toward the shoreline and away from the transfer parcel ([Tetra Tech 2004a](#)).

Sites 28 and 29 consist of the west and east side on- and off-ramps of the San Francisco Bay Bridge (see [Figure 3](#)). The on- and off-ramps on YBI have been used since the Bay Bridge was constructed in 1936. The Navy is responsible for maintaining the on- and off-ramps, and Caltrans is responsible for maintaining the Bay Bridge. Most areas identified as Sites 28 and 29, except for the on- and off-ramps, are unpaved and are covered by grass or brush. Surface soils have been contaminated with lead and other metals as a result of vehicle emissions and ramp and bridge painting and maintenance. Soil beneath and surrounding the on- and off-ramps was investigated, and metals were detected at concentrations that exceeded background levels. Based on the approximate distance of the YBI transfer parcel from the Bay Bridge (150 to 200 feet), it is unlikely that lead paint and vehicle emissions will affect the parcel. Most of Site 29 was transferred by the FHWA to Caltrans by a quit claim deed dated October 25, 2000.

Adjacent Sites 08, 11, 28, and 29 are not a source of contamination to soil or groundwater within the YBI transfer parcel because (1) chemicals of potential concern are in soil only, or (2) the direction of groundwater flow is crossgradient or away from the location of the YBI transfer parcel.

Caltrans uncovered debris containing dry cell batteries in EBS Parcels YB017 and YB022 during excavation of a utility trench in 2002. The area is referred to as the Battery Site. As part of the data gaps investigation conducted in September 2003, the Navy further characterized YB017 and YB022 to assess the extent of chemicals of potential concern. The area will undergo further investigation after Caltrans has completed construction on the Bay Bridge ([Shaw 2005a](#)). This area was removed from the YBI transfer parcel (see [Figure 3](#)). The boundary contains sufficient buffer to prevent migration of contaminants onto the YBI transfer parcel.

## **7.0 PROPOSED REUSE**

The proposed reuse for the YBI transfer parcel is based on the preferred land-use alternative for YBI set forth in the “Final Environmental Impact Statement” (Navy 2003). The Navy evaluated the potential environmental impacts of several future land-use scenarios at YBI and selected the reuse alternative representing full implementation of the development scenario as the preferred alternative. The following planned reuse of areas within the YBI FOST parcels were identified under the preferred alternative and are shown on [Figure 4](#).

- Residential/Publicly Oriented
- Open space and recreation
- Conference center

## **8.0 CONVEYANCE CONDITIONS AND NOTIFICATIONS**

The YBI transfer parcel will be transferred in accordance with federal disposal laws for real property. The proposed deed for transfer of the YBI transfer parcel will contain applicable CERCLA 120(h) notices, covenants, and warranties, as well as the additional notifications and restrictions indicated below.

The terms Grantor and Grantee are introduced below and refer to the Navy and the property recipient(s), respectively.

### **8.1 NOTICES**

Notices to be provided in conjunction with transfer of the YBI transfer parcel, either by deed or as part of this FOST, are provided in the following sections.

#### **8.1.1 Notice of Hazardous Substances**

As required by CERCLA Section 120(h)(1) and codified at Title 40 CFR Section 373.1, notification of hazardous substance storage or releases is required for transfer of federal property at which any hazardous substance was stored for 1 year or more, or was known to have been released or disposed of. Notification must include (1) the types and quantities of such hazardous substances; (2) the time at which such storage occurred; and (3) the types, quantities, and time periods associated with any releases or disposal of hazardous substances. Such information must be made available on the basis of a complete search of agency files.

The notice required by Title 40 CFR Section 373.1 on past storage of hazardous substances applies only when one or more hazardous substances have been stored in quantities greater than or equal to the larger of (1) 1,000 kilograms or (2) the CERCLA reportable quantity for each hazardous substance, which is listed at Title 40 CFR Section 302.4. Hazardous substances that are also listed under Title 40 CFR Section 261.30 as “acutely hazardous wastes” and that are

stored for 1 year or more are subject to the notice requirement when stored in quantities greater than or equal to 1 kilogram. Under this notification requirement, hazardous substances do not include petroleum products.

[Table 6](#) lists the hazardous substances in the YBI transfer parcel that require notification under CERCLA Section 120(h).

### **8.1.2 Asbestos-Containing Material**

[Table 2](#) summarizes the available information on the existence, extent, and condition of ACM at buildings, structures, or facilities within YBI transfer parcel. This information was collected from the ACM surveys conducted at NAVSTA TI.

The deed will contain a notice that the Grantee is hereby informed and does acknowledge that hazardous materials in the form of asbestos or ACM were found and are otherwise presumed to exist in buildings and structures (including steam pipe wrap in buildings and utility corridors) within the YBI transfer parcel. The SEBS and this FOST disclose the presence of known asbestos or ACM in buildings within the YBI transfer parcel ([SulTech 2005](#)).

The deed may contain a notice that the Grantor will provide a Notice of Release, in recordable form, to the Grantee at such time as demolition of the buildings in the YBI transfer parcel containing ACM has been completed. The deed may also contain a notice that the Grantor will provide a Notice of Release, in recordable form, to the Grantee at such time as the appropriate government regulatory agencies have confirmed in writing to the Grantee that ACM has been removed from the buildings and any necessary soil remediation has been conducted in accordance with all applicable federal, state, and local laws and regulations. This Notice of Release will be deemed to remove all notices and restrictions relating to ACM for the YBI transfer parcel. The Grantor will have no obligation for the demolition of buildings or the removal of ACM or soil remediation related to such demolition or removal action.

### **8.1.3 Lead-Based Paint**

The deed will contain a notice that the YBI transfer parcel contains buildings, structures, or facilities that were built before 1978 and that may contain LBP.

The deed will contain a notice that soil underlying hardscape (buildings, foundations, sidewalks, and driveways) adjacent to Quarters 1 through 7 and 10 may have elevated lead levels.

### **8.1.4 Residual Petroleum Contamination: UST 66**

The deed will contain a notice to expect petroleum-impacted (diesel) shallow and deep soil along the western side of Building 66 (in the vicinity of the UST that was closed-in-place, and underneath the sidewalk, beneath the closed UST, and beneath Building 66). See soil restriction

for residual petroleum contamination in [Section 8.2.7](#). No notifications or restrictions are required for groundwater at the site.

### **8.1.5 Ongoing Petroleum Corrective Actions: YF3**

The deed will contain a notice that petroleum-impacted (diesel) soil remains in place at Site YF3. Soil restrictions are required, and temporary notifications and restrictions are required for groundwater at Site YF3.

The deed may also contain a notice that the Grantor may provide a Notice of Release, in recordable form, to the Grantee when the appropriate government regulatory agencies have confirmed, in writing, to the Grantee that such a prohibition on excavation, grading, removal, trenching, filling, earth movement, mining, or other disturbance of soil at the current ground surface of Site YF3 is no longer necessary.

### **8.1.6 Polychlorinated Biphenyls**

The deed will contain a notice that PCB-containing electrical equipment exists inside the Building 118 (6585265) vault room and in the Building 200 (TX-252) vault room in the YBI transfer parcel. This equipment contains levels of PCBs exceeding the high-occupancy requirements of TSCA (1 mg/kg). However, these vaults are low-occupancy areas within the meaning of TSCA and levels are below the low-occupancy criterion.

The deed may contain a notice that the Grantor will provide a Notice of Release, in recordable form, to the Grantee when PCBs have been remediated to levels that would support high-occupancy uses in the YBI Transfer Parcel. This Notice of Release will be deemed to remove all notices and restrictions relating to PCBs for the YBI transfer parcel.

## **8.2 COVENANTS, WARRANTIES, AND RESTRICTIONS**

This section describes the covenants, warranties, and restrictions to be included in the transfer deed.

### **8.2.1 All Remedial Action Has Been Taken**

The deed will include a covenant by the United States, made pursuant to the provisions of CERCLA Section 120(h)(3)(A)(ii)(I), warranting that all remedial action necessary to protect human health and the environment with respect to any hazardous substance remaining on the YBI transfer parcel has been taken before the date of transfer, except for those parcels designated as ECP Type 1 where no remedial action has been taken, which are shown on [Figure 2](#) (parcels YB005, YB006, YB009 and portions of parcels YB014 and YB018).

## **8.2.2 Additional Remediation Obligation**

The deed will include a covenant by the United States, made pursuant to the provisions of CERCLA Section 120(h)(3)(A)(ii)(II), warranting that any remedial action found to be necessary after the date of such transfer shall be conducted by the United States.

## **8.2.3 Right of Access**

The deed will contain a covenant by the Grantee granting the United States right of access to the property, pursuant to the provisions of CERCLA Section 120(h)(3)(A)(iii), in any case in which any remedial or corrective action is found to be necessary after the date of such transfer.

## **8.2.4 Enforcement Authority**

Pursuant to the existing memorandum of agreement executed in March 2000 between the Navy and the DTSC, the Navy will also grant to DTSC a covenant providing the DTSC with enforcement authority for all restrictions identified in this section ([DTSC 2000](#)).

## **8.2.5 Lead-Based Paint**

The prospective Grantee will be required to comply with the specific restrictions listed below. The buildings, structures, or facilities within the YBI transfer parcel have been separated first between residential and nonresidential, and further into two categories to help evaluate the restrictions associated with LBP: (1) buildings, structures, or facilities built before 1978 or that have an unknown construction date, and (2) buildings, structures, or facilities built after 1978.

The transferee will be responsible for managing LBP and LBP hazards in accordance with applicable federal, state, and local laws and other requirements relating to LBP and LBP hazards. Additionally, the Grantee will be responsible for demolishing buildings, structures, or facilities and identifying and evaluating any LBP hazards.

### **8.2.5.1 Residential Buildings, Structures, or Facilities**

In accordance with DoD policy ([DoD 2000](#)), the Navy will conduct a LBP risk assessment or reevaluation of pre-1978 residential housing units within 1 year before the property is transferred. The deed will contain a restriction that the grantee must conduct any necessary abatement of LBP hazards identified in unleased pre-1960 residential buildings before the buildings can be occupied. LBP hazards identified in the leased pre-1960 residential buildings must be abated within 1 year of the assessment, and abatement will be made a condition of the property transfer.

At the time of the issuance of this FOST no LBP hazards requiring abatement have been identified in association with Quarters 1 through 7 and 10. However, due to the potential for the presence of lead in soil beneath hardscape (buildings, foundations, sidewalks, and driveways) adjacent to these quarters, the Transferee will be required to maintain the hardscape

intact as a barrier between underlying soil and the surface. In the event the hardscape is removed, the Transferee shall assess and abate any identified soil lead hazards pursuant to applicable federal, state and local laws.

Soil under hardscape adjacent to residential housing built before 1978 (scheduled for demolition and planned for residential redevelopment after transfer of the YBI transfer parcel) must be evaluated for LBP hazards. The Transferee will evaluate the soil for lead hazards after the existing residential buildings, structures, or facilities and paved surfaces surrounding the residential buildings, structures, or facilities are demolished. The Transferee will conduct abatement of lead hazards identified in soil before the new residential buildings, structures, or facilities are occupied or within 3 months of removal of hardscape adjacent to residential housing units occupied by children (DoD 1999).

These restrictions apply to all the housing units built before 1978 on YBI.

#### **8.2.5.2 Nonresidential Buildings, Structures, or Facilities**

For pre-1978 non-residential buildings, the transferee will be required to restrict uses of these buildings to non-residential uses until the buildings are demolished. If a building or land is to be used or developed for residential use, the constituents driving risk, namely LBP on interior/exterior building surfaces or in soils, must be remedied, if necessary, and the remedy must demonstrate protection of human health for residential use. A future transferee wishing to release the restriction would be obliged to abate LBP on interior/exterior building surfaces and/or in soils and petition, both the Navy and the DTSC independently, to obtain a release of the restriction from each party.

#### **8.2.6 Ongoing Petroleum Corrective Actions: YF3**

Petroleum contamination in groundwater and soil within part of the YBI transfer parcel is being addressed by remediation and regulatory closeout. The YBI transfer parcel will be transferred before regulatory closure is attained at the only remaining petroleum site, Inactive Fuel Line Site YF3, which has not received regulatory closure. Restrictions are necessary at this site to address potential human health and environmental risks that may exist from exposure to petroleum contamination at the YBI transfer parcel (1) under current conditions and (2) while the petroleum corrective action is ongoing. [Figure 5](#) shows the location of Site YF3 requiring a restriction.

The deed will contain a covenant by the Grantee on behalf of itself, its successors and assigns, or agents, that, during the period from property transfer until regulatory closure and until the restriction is no longer necessary, no activities that will disturb the soil at the site shall be permitted within Inactive Fuel Line Site YF3, as shown on [Figure 5](#), without a Water Board and Navy approved soil management plan (SMP) or other appropriate document.

### **8.2.7 Residual Petroleum Contamination: UST 66**

The deed will contain a covenant by the Grantee on behalf of itself, its successors and assigns, that no activities (such as excavation, grading, removal, trenching, filling, earth movement, or mining) that will disturb soil at or below the current ground surface will be permitted within the UST 66 area (of Building 66) without a Water Board-approved soil management plan. The area is identified on [Figure 5](#).

### **8.2.8 Groundwater Use Restriction**

The deed will contain a covenant prohibiting the Grantee from installing groundwater production wells in the Inactive Fuel Line Site YF3 for use without the written approval of DTSC and the Water Board until regulatory closure has been granted and until the restriction is no longer necessary.

### **8.2.9 Asbestos-Containing Material Restriction**

The deed will require the transferee to comply with the specific restrictions listed below:

- The transferee shall manage ACM in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM.
- A restriction is applicable for buildings containing non-FAD ACM within the YBI transfer parcel where asbestos was identified: Buildings 60, 61, 107, 118, 142, 162T, 168T, 205, 221, 225, 227, 243, 253, 255, 261, and Quarters 1.
- A restriction is applicable to the following buildings within the YBI transfer parcel where FAD ACM was identified and patched or repaired: Buildings 57, 62, 83, 200, 229, 230, 240, 267, 276, 300, 301, 302, 303, 304, 324, 325, 326, 327, 328, 329, and 331, and Quarters 2, 4, 5, 6, 7, and 10.
- If ACM is discovered during use, occupancy, renovation, or demolition, the transferee will be responsible for management and removal of ACM in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM.

### **8.2.10 Polychlorinated Biphenyls Restriction**

PCBs have been detected according to TSCA criteria, at elevated levels in electrical transformer vaults in currently unoccupied Buildings 118 (Transformer 6585265) and 200 (Transformer TX-252) within the FOST parcel. The table below presents the current locations of transformers in vaults, associated transformer identification numbers, and the maximum PCB concentrations reported in samples collected from areas adjacent to the transformer locations. The Navy will address these transformers located inside these vault buildings by restricting access to the vaults to low occupancy uses or other actions consistent with TSCA. Any modifications to the vaults must comply with all regulations regarding PCBs, as appropriate. If the Navy determines additional remedial activities are appropriate, these activities will be performed before transfer.

<b>EBS Parcel</b>	<b>FOST Parcel</b>	<b>Equipment ID Number</b>	<b>Building</b>	<b>Building Occupancy Status</b>	<b>Maximum Concentration</b>	<b>Restriction</b>
YB015	YBI Transfer Parcel	6585265	Building 118 Vault Room	Unoccupied	1.1 mg/kg 1.5 mg/kg	Low occupancy uses only
YB019	YBI Transfer Parcel	TX-252	Building 200 Vault Room	Unoccupied	1.2 mg/kg	Low occupancy uses only

Notes:  
mg/kg Milligrams per kilogram

### 8.3 SUMMARY OF NOTIFICATIONS AND RESTRICTIONS

The following matrix is a summary of notifications and restrictions discussed in [Sections 8.1 and 8.2](#).

<b>Issue</b>	<b>Notification</b>	<b>Section</b>	<b>Covenant</b>	<b>Section</b>	<b>Restriction</b>	<b>Section</b>
Hazardous Substances	✓	8.1.1				
All Remedial Action has been Taken			✓	8.2.1		
Additional Remediation Obligation			✓	8.2.2		
Right of Access			✓	8.2.3		
Enforcement Authority			✓	8.2.4		
Asbestos Containing Material	✓	8.1.2			✓	8.2.9
Residual Petroleum Contamination: UST 66	✓	8.1.4	✓	8.2.7		
Ongoing Petroleum Corrective Action: YF3	✓	8.1.5	✓	8.2.6	✓	8.2.6
Lead-Based Paint	✓	8.1.3	✓	8.2.5	✓	8.2.5
Polychlorinated Biphenyls	✓	8.1.6			✓	8.2.10
Groundwater Use Restriction			✓	8.2.8		

**9.0 FINDING OF SUITABILITY TO TRANSFER**

Based upon the foregoing information and analysis, I find that the subject FOST areas are suitable for transfer by deed for the intended purpose, to the extent known, because the requirements of CERCLA Section 120(h)(3) or 120(h)(4) have been met for the property, taking into account the potential risk of future liability.

Laura Duchnak  
**Laura Duchnak**  
**Director BRAC PMO West**

3/22/06  
Date

## **FIGURES**

---



Notes:  
FOST Finding of Suitability to Transfer

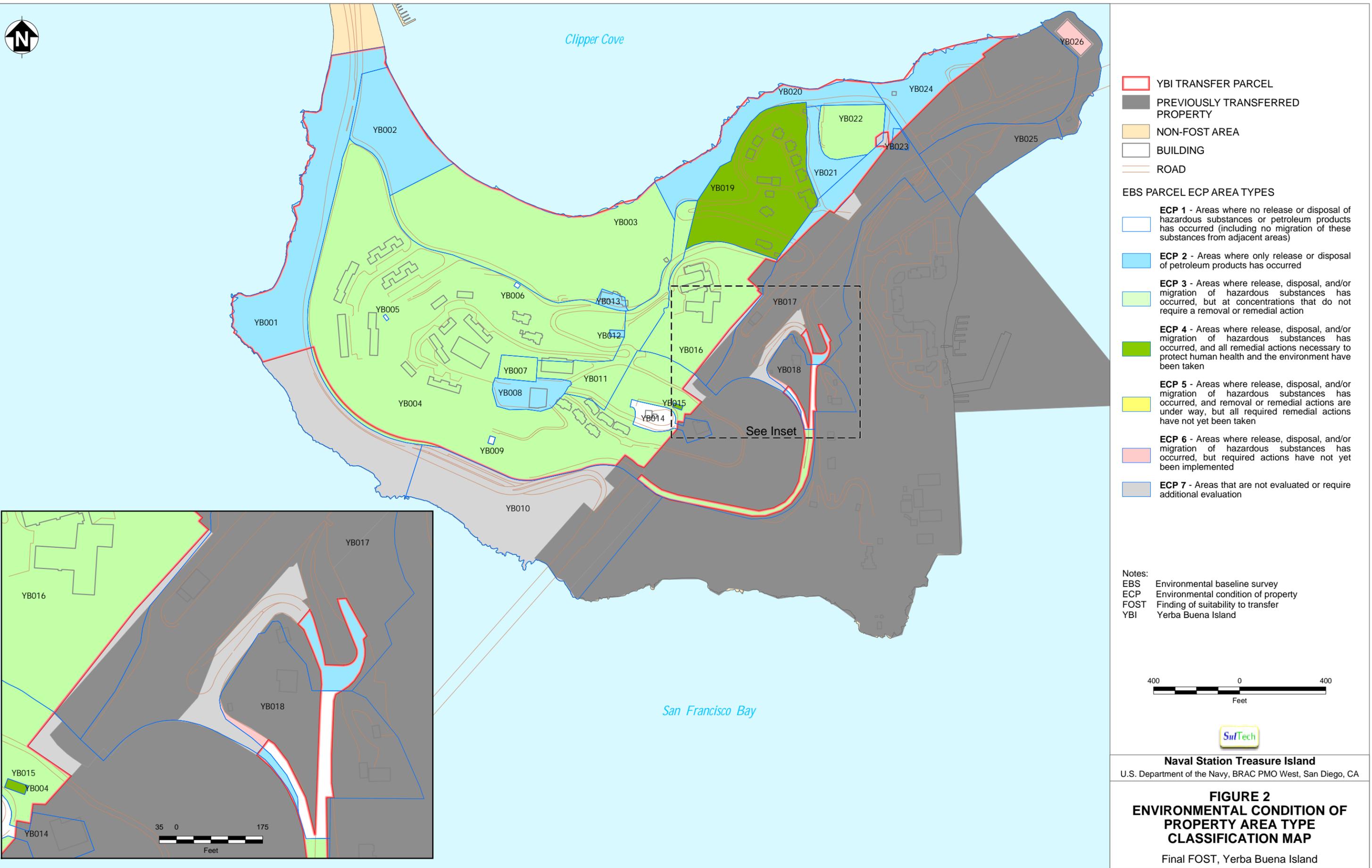
Reference:  
ESRI Data & Maps 2004 used for the base map.



**Naval Station Treasure Island**  
U.S. Department of the Navy, BRAC PMO West, San Diego, CA

**FIGURE 1  
REGIONAL LOCATION MAP**

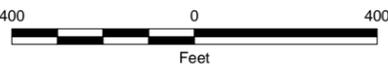
Final FOST, Yerba Buena Island



- YBI TRANSFER PARCEL
- PREVIOUSLY TRANSFERRED PROPERTY
- NON-FOST AREA
- BUILDING
- ROAD

- EBS PARCEL ECP AREA TYPES**
- ECP 1** - Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas)
  - ECP 2** - Areas where only release or disposal of petroleum products has occurred
  - ECP 3** - Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action
  - ECP 4** - Areas where release, disposal, and/or migration of hazardous substances has occurred, and all remedial actions necessary to protect human health and the environment have been taken
  - ECP 5** - Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are under way, but all required remedial actions have not yet been taken
  - ECP 6** - Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented
  - ECP 7** - Areas that are not evaluated or require additional evaluation

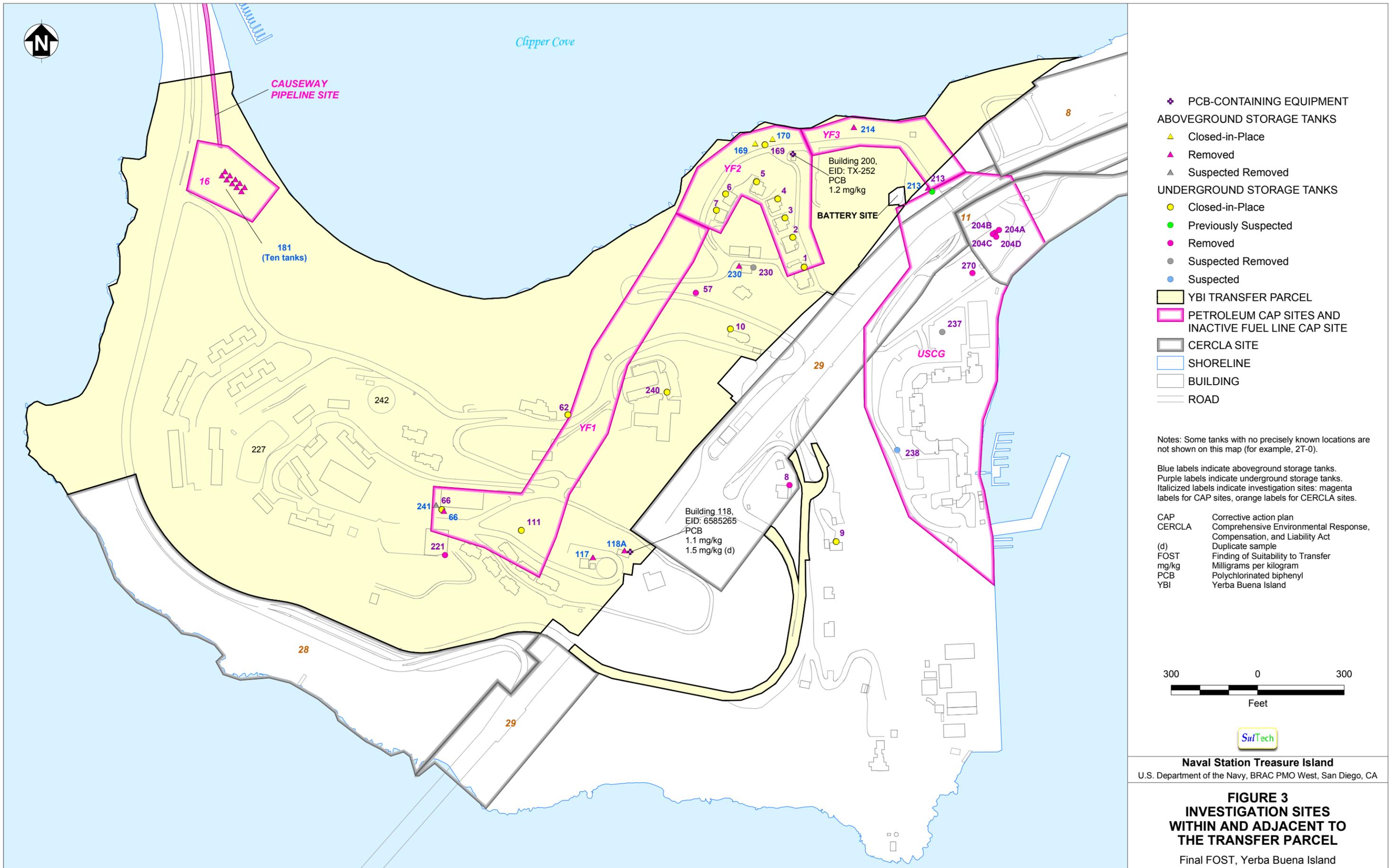
Notes:  
 EBS Environmental baseline survey  
 ECP Environmental condition of property  
 FOST Finding of suitability to transfer  
 YBI Yerba Buena Island



**Naval Station Treasure Island**  
 U.S. Department of the Navy, BRAC PMO West, San Diego, CA

**FIGURE 2**  
**ENVIRONMENTAL CONDITION OF**  
**PROPERTY AREA TYPE**  
**CLASSIFICATION MAP**

Final FOST, Yerba Buena Island

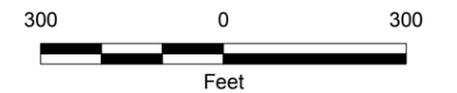


- ✚ PCB-CONTAINING EQUIPMENT
- ▲ ABOVEGROUND STORAGE TANKS
  - ▲ Closed-in-Place
  - ▲ Removed
  - ▲ Suspected Removed
- UNDERGROUND STORAGE TANKS
  - Closed-in-Place
  - Previously Suspected
  - Removed
  - Suspected Removed
  - Suspected
- YBI TRANSFER PARCEL
- PETROLEUM CAP SITES AND INACTIVE FUEL LINE CAP SITE
- CERCLA SITE
- SHORELINE
- BUILDING
- ROAD

Notes: Some tanks with no precisely known locations are not shown on this map (for example, 2T-0).

Blue labels indicate aboveground storage tanks.  
 Purple labels indicate underground storage tanks.  
 Italicized labels indicate investigation sites: magenta labels for CAP sites, orange labels for CERCLA sites.

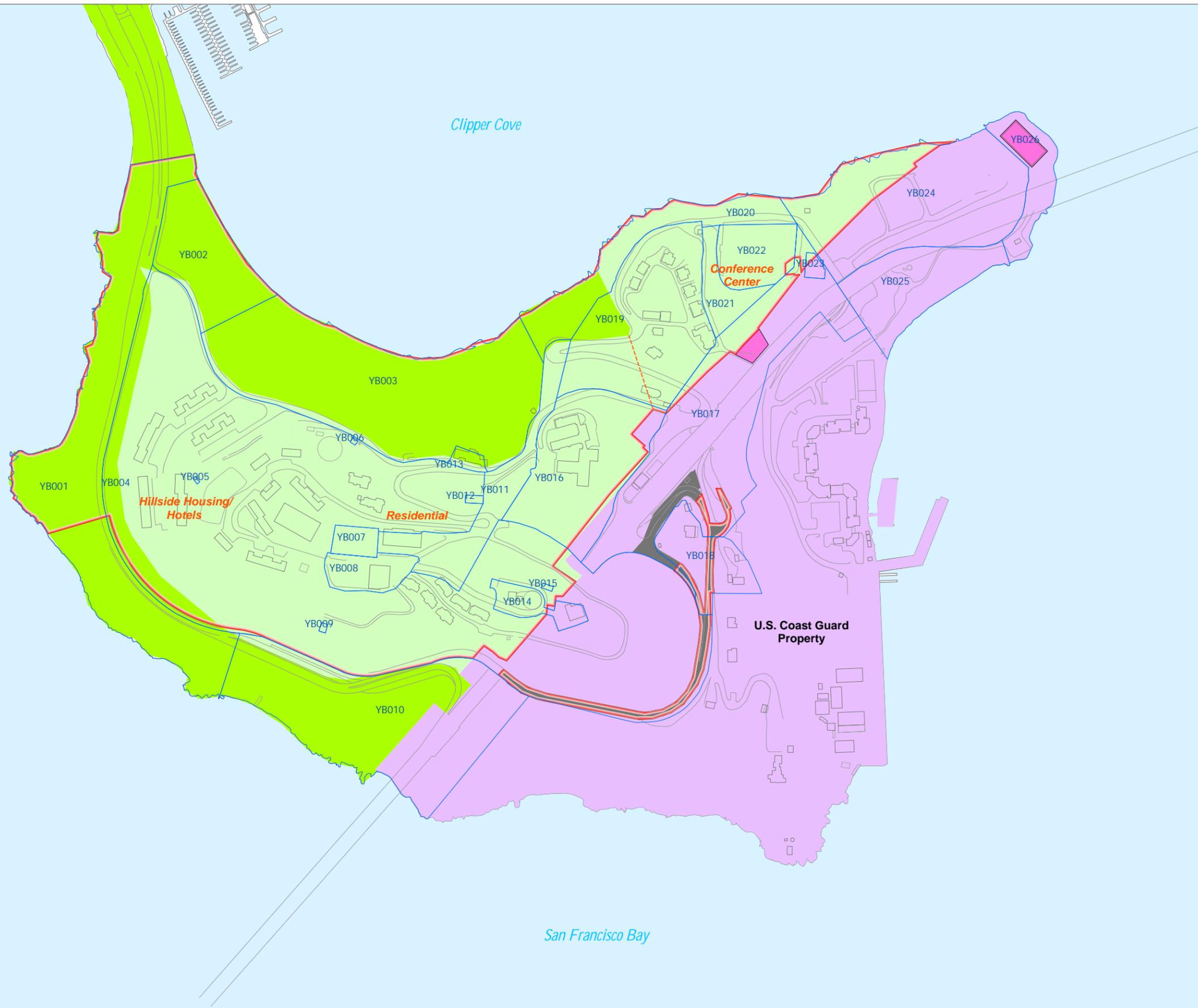
CAP	Corrective action plan
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
(d)	Duplicate sample
FOST	Finding of Suitability to Transfer
mg/kg	Milligrams per kilogram
PCB	Polychlorinated biphenyl
YBI	Yerba Buena Island



**Naval Station Treasure Island**  
 U.S. Department of the Navy, BRAC PMO West, San Diego, CA

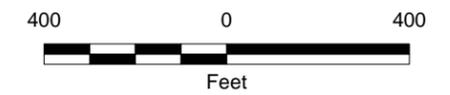
**FIGURE 3**  
**INVESTIGATION SITES**  
**WITHIN AND ADJACENT TO**  
**THE TRANSFER PARCEL**

Final FOST, Yerba Buena Island



- YBI TRANSFER PARCEL
- EBS PARCEL
- BUILDING
- ROAD
- REUSE AREAS \*
- Caltrans Aerial Easement
- No Reuse Designated
- Open Space and Recreation
- Previously Transferred Property
- Residential/Publicly Oriented

Notes:  
 Caltrans California Department of Transportation  
 EBS Environmental baseline survey  
 FOST Finding of Suitability to Transfer  
 YBI Yerba Buena Island  
 \* U.S. Department of the Navy, Southwest Division  
 Naval Facilities Engineering Command (SWDIV).  
 2003. "Final Environmental Impact Statement."  
 June 27



**Naval Station Treasure Island**  
 U.S. Department of the Navy, BRAC PMO West, San Diego, CA

**FIGURE 4  
 PLANNED REUSE AREAS**

Final FOST, Yerba Buena Island



- SHALLOW SOIL DEED RESTRICTION
- PCB SITE SUBJECT TO RESTRICTION
- PETROLEUM SITE SUBJECT TO RESTRICTIONS
- YBI TRANSFER PARCEL
- EBS PARCEL
- BUILDING
- ROAD

Notes:  
 FOST Finding of Suitability to Transfer  
 PCB Polychlorinated biphenyl  
 YBI Yerba Buena Island  
 EID Equipment identification



**Naval Station Treasure Island**  
 U.S. Department of the Navy, BRAC PMO West, San Diego, CA

**FIGURE 5**  
**AREAS SUBJECT TO**  
**PETROLEUM AND PCB**  
**NOTICES AND RESTRICTIONS**

Final FOST, Yerba Buena Island

## **TABLES**

---

**TABLE 1: SUMMARY OF ECP AREA TYPES FOR EBS PARCELS IN TRANSFER PARCEL**

Final, Finding of Suitability for Transfer, Yerba Buena Island

<b>EBS Parcel</b>	<b>ECP Area Type</b>
YB001*	2
YB002	2
YB003	3
YB004*	3
YB005	1
YB006	1
YB007	3
YB008	2
YB009	1
YB011	3
YB012	2
YB013	2
YB014*	1
YB015	4
YB016*	3
YB017*	2
YB018*	1
YB019	4
YB020*	2
YB021	2
YB022*	3
YB023*	2
YB024*	2

Notes:

\* ECP area type for portion of EBS Parcel located in the Yerba Buena Island transfer parcel (see [Figure 2](#)).

EBS Environmental baseline survey

ECP Environmental condition of property

## TABLE 2: SUMMARY OF ASBESTOS-CONTAINING MATERIAL SURVEY RESULTS

Final Finding of Suitability to Transfer, Yerba Buena Island

<b>EBS Parcel</b>	<b>Building</b>	<b>Surveyed</b>	<b>Asbestos Present</b>	<b>Friability</b>	<b>Asbestos Document*</b>
YB003	253	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB004	Qtrs 60	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB004	Qtrs 61	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB004	Qtrs 105	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997a
YB004	Qtrs 106	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997a
YB004	Qtrs 109	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997a
YB004	Qtrs 111	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997a
YB004	Qtrs 113	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997a
YB004	Qtrs 115	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997a
YB004	162T	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB004	227	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB004	242T	Yes	<input type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB004	243	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB004	276	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1998b
YB004	300	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB004	301	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB004	302	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB004	303	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB004	304	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB004	324	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB004	325	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB004	326	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB004	327	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998a
YB004	328	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB004	329	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB004	331	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB005	225	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB006	261	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB008	221	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB009	255	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB011	66	Yes	<input type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB012	274	Yes	<input type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB013	62	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1998b; SSSPORTS 1999a
YB014	107	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB014	168T	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB014	229	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a; SulTech 2005a
YB014	UN25	Yes	<input type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB015	118	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB016	240	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a; SulTech 2005a

## TABLE 2: SUMMARY OF ASBESTOS-CONTAINING MATERIAL SURVEY RESULTS (Continued)

Final Finding of Suitability to Transfer, Yerba Buena Island

EBS Parcel	Building	Surveyed	Asbestos Present	Friability	Asbestos Document*
YB019	Qtrs 1	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997a; Mendelian Construction 2002; SulTech 2005a
YB019	Qtrs 2	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998a; SulTech 2005a
YB019	Qtrs 3	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997a; SulTech 2005a
YB019	Qtrs 4	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB019	Qtrs 5	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998a; SulTech 2005a
YB019	Qtrs 6	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998a; Mendelian Construction 2002
YB019	Qtrs 7	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998a; Mendelian Construction 2002
YB019	Qtrs 10	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB019	57	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a; SulTech 2005a
YB019	83	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB019	142	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB019	200	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
YB019	205	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
YB019	230	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1998b
YB019	267	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1998b

Notes:

- Unchecked boxes means none identified
- \* Asbestos-containing materials do not require regulatory concurrence
- ATG Allied Technology Group, Inc.
- EBS Environmental baseline survey
- Radian Radian International LLC
- SSPORTS Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment, Vallejo

References:

Allied Technology Group, Inc. (ATG). 1998a. "Asbestos Abatement/Repair Buildings: 1, 7, 29, 34, 41, 62, 91, 96, 227; Quarters 2, 5, 6, 7, Townhouses 327 A&B at Treasure Island." March 1.

Mendelian Construction, Inc. 2002. "Final Report Treasure Island/Yerba Buena Island Asbestos Removal." May 13.

Radian. 1997a. "Asbestos Survey Summary of 141 Buildings for NAVSTA TI." May

SSPORTS. 1998b. "Asbestos Building Survey Report for Miscellaneous Facility Buildings and Underground Steam Utility Lines at TI and YBI Vol. 1; Asbestos Building Survey Report for Residential Housing Units at Treasure Island and Yerba Buena Island, Vol. II." November.

SSPORTS. 1999a. "Asbestos Remediation Completion Report For Residential Housing Units (Vol.1) and Nonresidential Miscellaneous Facility Buildings (Vol.2) at Treasure Island and Yerba Buena Island." August.

SulTech. 2005. "Revised Draft Final Supplemental EBS, NAVSTA TI, San Francisco, California." Prepared for BRAC PMO West. March 100

**TABLE 3: SUMMARY OF ABOVEGROUND STORAGE TANKS AND UNDERGROUND STORAGE TANKS**

Final, Finding of Suitability to Transfer, Yerba Buena Island

EBS Parcel	Tank	Material Stored/ Disposed	Capacity (gallons)	Tank Status	Regulatory Closure	Potential for Contamination Observed	Associated Site	Closure Document	ECP Area Type
YB002	ASTs 181	Diesel fuel and aviation gasoline	170,000	Removed	NA		Petroleum Site 16	Water Board 2004f	1
YB004	AST 162T	Water	Unknown	Active	NA		NA	NA	1
YB004	AST 227	Water	Unknown	Active	NA		NA	NA	1
YB004	AST 242T	Water	Unknown	Active	NA		NA	NA	1
YB004	AST 2T-O	Oil	Unknown	Removed	NA		NA	PRC & Uribe and Associates 1997	1
YB008	UST 221	NA	300	Removed	NFA concurrence	No; release not indicated by sampling	NA	Water Board 2004d	2
YB011	AST 241	NA	Unknown	Removed	NA		NA	NA	1
YB011	AST 66	Heating oil	Unknown	Removed	NA		Petroleum Site YF1	NA	1
YB011	UST 111	Diesel fuel	37,500	Closed-in-place	Closed	Yes; debris collected from tank showed evidence of contamination and strong diesel odor observed	Petroleum Site YF1	Water Board 1996	2
YB011	UST 66	Diesel fuel	2,000	Closed-in-place	Closed	No; soil was excavated from the site	Petroleum Site YF1	Water Board 2002c	2
YB013	UST 62	Fuel oil	350	Closed-in-place	NFA concurrence	No; soil and groundwater samples were not collected	NA	Water Board 2002b	2
YB014	AST 117	Black oil	37,000	Removed	NA		NA	NA	1
YB014	AST 168T	Water	Unknown	Active	NA		NA	NA	1
YB015	AST 118A	Fuel	30	Removed	NA			SulTech 2005a	1
YB016	UST 240	Fuel oil	1,000	Closed-in-place	NFA concurrence	No; soil and groundwater samples were not collected	NA	Water Board 2002b	2
YB019	AST 230	Fuel oil	55	Removed			NA	NA	1

**TABLE 3: SUMMARY OF ABOVEGROUND STORAGE TANKS AND UNDERGROUND STORAGE TANKS  
(Continued)**

Final, Finding of Suitability to Transfer, Yerba Buena Island

EBS Parcel	Tank	Material Stored/ Disposed	Capacity (gallons)	Tank Status	Regulatory Closure	Potential for Contamination Observed	Associated Site	Closure Document	ECP Area Type
YB019	UST 1	Fuel oil	225	Closed-in-place	NFA concurrence	No; soil and groundwater samples were not collected	Petroleum Site YF2	Water Board 2002b	2
YB019	UST 10	Fuel oil	250	Closed-in-place	NFA concurrence	No; soil and groundwater samples were not collected	NA	Water Board 2002b	2
YB019	UST 2	Fuel oil	250	Closed-in-place	NFA concurrence	No; soil and groundwater samples were not collected	Petroleum Site YF2	Water Board 2002b	2
YB019	UST 230 (YBI)	Fuel oil	300	Suspected removed	NFA concurrence	No; release not indicated by soil sampling	NA	Water Board 2004d	2
YB019	UST 3	Fuel oil	250	Closed-in-place	NFA concurrence	No; soil and groundwater samples were not collected	Petroleum Site YF2	Water Board 2002b	2
YB019	UST 4	Fuel oil	175	Closed-in-place	NFA concurrence	No; soil and groundwater samples were not collected	Petroleum Site YF2	Water Board 2002b	2
YB019	UST 5	Fuel oil	175	Closed-in-place	NFA concurrence	No; soil and groundwater samples were not collected	Petroleum Site YF2	Water Board 2002b	2
YB019	UST 57	Diesel fuel	500	Removed	NFA concurrence	No; release not indicated by soil sampling	NA	Water Board 2003e	1
YB019	UST 6	Fuel oil	225	Closed-in-place	NFA concurrence	No; soil and groundwater samples were not collected	Petroleum Site YF2	Water Board 2002b	2
YB019	UST 7 (YBI)	Fuel oil	225	Closed-in-place	NFA concurrence	No; soil and groundwater samples were not collected	Petroleum Site YF2	Water Board 2002b	2
YB020	AST 169	Fuel oil	26,670	Closed-in place	NA		Petroleum Site YF2	Water Board 2002b	1
YB020	AST 170	Fuel oil	26,670	Closed-in place	NA		Petroleum Site YF2	Water Board 2002b	1
YB020	AST 214	Diesel fuel	10,000	Removed	NA		Petroleum Site YF3	NA	1
YB020	UST 169	Diesel fuel	10,000	Closed-in-place	Closed	No; tank surrounded by concrete block	Petroleum Site YF2	Water Board 1996	2

**TABLE 3: SUMMARY OF ABOVEGROUND STORAGE TANKS AND UNDERGROUND STORAGE TANKS  
(Continued)**

Final, Finding of Suitability to Transfer, Yerba Buena Island

Notes:

AST	Aboveground storage tank	NFA	No further action
EBS	Environmental baseline survey	Shaw	Shaw Environmental and Infrastructure, Inc.
ECP	Environmental condition of property	UST	Underground storage tank
ERM-West	Environmental Resources Management West, Inc.	Water Board	San Francisco Bay Regional Water Quality Control Board
NA	Not applicable	YBI	Yerba Buena Island

References:

- PRC and Uribe and Associates (UA). 1997. "Environmental Baseline Survey Sampling and Analysis Screening Level Report, Naval Station Treasure Island." EFA-WEST. July.
- Sultech. 2005. "Revised Draft Final Supplemental Environmental Baseline Survey Treasure Island, San Francisco, California." Prepared for BRAC PMO Wet. March 10.
- Water Board. 1996. Letter Regarding UST Case Closure (Tanks 1B, 1C, 1D, 1F, 2A, 2D, 111, 169, 180A, 180B, 330C, 330D), NAVSTA TI. From Loretta K. Barsamian, Executive Officer, Water Board. To Baha Zarah, EFA WEST. July 22.
- Water Board. 2002b. Letter Regarding Concurrence on Request for No Further Action, Home Heating Oil Tanks, Yerba Buena Island, NAVSTA TI, San Francisco (Tanks 1, 2, 3, 4, 5, 6, 7, 9, 10, 62, 240). From Sarah Raker, Associate Engineering Geologist, Water Board. To Ellen Casados, Remedial Project Manager, SWDIV. July 23.
- Water Board. 2002c. Letter Regarding Case Closure Letter for DoD UST at NAVSTA TI including UST 66. From Loretta Barsamian, Executive Officer, Water Board. To Ellen Casados, Southwest Division, Naval Facilities Engineering Command. October 23.
- Water Board. 2003e. Letter Regarding Concurrence on Request for NFA, UST 57 and 234, NAVSTA TI, San Francisco, California. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. September 5.
- Water Board. 2004d. Letter Regarding Concurrence on Request for NFA, UST 140, 221, and 230; Naval Station Treasure Island San Francisco, California. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. June 17.
- Water Board. 2004f. Letter Regarding Concurrence on NFA, Site 16, Naval Station Treasure Island, San Francisco. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. June 17.

**TABLE 4: LEAD-BASED PAINT INFORMATION FOR BUILDINGS CONSTRUCTED BEFORE 1978**

Final, Finding of Suitability to Transfer, Yerba Buena Island

<b>EBS Parcel</b>	<b>Building</b>	<b>Year Built</b>	<b>Use</b>	<b>LBP Present</b>	<b>LBP Assessment</b>	<b>Interior/Exterior LBP Abatement</b>	<b>Soil Abatement</b>	<b>Status at Time of FOST</b>
YB003	253	1945	Storage shed, tool shed	Yes				No action required for closure
YB004	Qtrs 60	1917	Housing	Yes	Forensic 1998b; AFA Construction Inc. 1998	ASC 2003	SSPORTS 1999	Pending
YB004	Qtrs 61	1917	Housing	Yes	ITSI 2004	ASC 2003	AFA Construction Inc. 1999	Pending
YB004	Qtrs 105	1934	Housing	Yes	Forensic 1998b; AFA Construction Inc. 1998	ACC Inc. 1999a	Not Required	Pending
YB004	Qtrs 106	1934	Housing	Yes	Forensic 1998b	ACC Inc. 1999d	Not Required	Pending
YB004	Qtrs 109	1934	Housing	Yes	Forensic 1998b	ACC Inc. 1999b, ACC Inc. 1999e	Not Required	Pending
YB004	Qtrs 111	1921	Housing	Yes	Forensic 1998b	ITSI 2004	IT 2001	Pending
YB004	Qtrs 113	1921	Housing	Yes	Forensic 1998b	ACC Inc. 1999f	SSPORTS 1999	Pending
YB004	Qtrs 115	1921	Housing	Yes	AFA Construction Inc. 1998	ACC Inc. 1999g	Not Required	Pending
YB004	162T	1919	Water storage tank	Yes				No action required for closure
YB004	227	1938	Water reservoir	Assumed				No action required for closure
YB004	242T	1944	Water storage tank	Assumed				No action required for closure
YB004	243	1944	Pump house	Assumed				No action required for closure

**TABLE 4: LEAD-BASED PAINT INFORMATION FOR BUILDINGS CONSTRUCTED BEFORE 1978 (Continued)**

Final, Finding of Suitability to Transfer, Yerba Buena Island

<b>EBS Parcel</b>	<b>Building</b>	<b>Year Built</b>	<b>Use</b>	<b>LBP Present</b>	<b>LBP Assessment</b>	<b>Interior/Exterior LBP Abatement</b>	<b>Soil Abatement</b>	<b>Status at Time of FOST</b>
YB004	276	1917	Laundry and "HW" building	Yes				No action required for closure
YB004	300	1966	Family housing (8 units)	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB004	301	1966	Housing	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB004	302	1966	Housing	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB004	303	1966	Housing	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB004	304	1966	Housing	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB004	324	1966	Housing	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB004	325	1966	Housing	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB004	326	1966	Housing	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB004	327	1966	Housing	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB004	328	1966	Housing	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB004	329	1966	Housing	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB004	331	1966	Housing	Yes	PWC 1996f	Only Notification Req	Not Required	Pending
YB005	225	1938	Pump house	Assumed				No action required for closure

**TABLE 4: LEAD-BASED PAINT INFORMATION FOR BUILDINGS CONSTRUCTED BEFORE 1978 (Continued)**

Final, Finding of Suitability to Transfer, Yerba Buena Island

<b>EBS Parcel</b>	<b>Building</b>	<b>Year Built</b>	<b>Use</b>	<b>LBP Present</b>	<b>LBP Assessment</b>	<b>Interior/Exterior LBP Abatement</b>	<b>Soil Abatement</b>	<b>Status at Time of FOST</b>
YB006	261	1948	Chlorination building	Assumed				No action required for closure
YB008	221	1943	Shelter, prisoners' workshop, garage	Yes				No action required for closure
YB011	66	1917	Barracks, oil heating plant, garage	Yes	Forensic 1998b; AFA Construction Inc. 1998	IT 2001; ACC Inc. 1999c	SSPORTS 1999; IT 2001	Pending
YB012	274	1930	Fallout shelter, storage	Assumed				No action required for closure
YB013	62	1944	Quarters	Yes	AFA Construction Inc. 1998	ASC 2003	Not Required	Pending
YB014	107	1917	Standby generator building, signal tower	Assumed				No action required for closure
YB014	168T	1919	Water storage tank	Assumed				No action required for closure
YB014	229	1944	RADIO school, laboratory, communication annex, mess open E4-6/NCO club, officer's club/USCG officer's club (vacant)	Assumed				No action required for closure
YB015	118	1922	Transformer house	Assumed				No action required for closure

**TABLE 4: LEAD-BASED PAINT INFORMATION FOR BUILDINGS CONSTRUCTED BEFORE 1978 (Continued)**

Final, Finding of Suitability to Transfer, Yerba Buena Island

<b>EBS Parcel</b>	<b>Building</b>	<b>Year Built</b>	<b>Use</b>	<b>LBP Present</b>	<b>LBP Assessment</b>	<b>Interior/Exterior LBP Abatement</b>	<b>Soil Abatement</b>	<b>Status at Time of FOST</b>
YB016	240	1944	Quarters, dispensary and ward	Yes	AFA Construction Inc. 1998	ASC 2003	IT 2002	Pending
YB019	Qtrs 1	1900	Senior officers' quarters	Yes	ITSI 2004	NTE 1999a; ASC 2003	Shaw 2005c	Pending
YB019	Qtrs 2	1900	Senior officers' quarters	Yes	HSA 1999b, HSA 1999c	ASC 2003	Shaw 2005c	Pending
YB019	Qtrs 3	1901	Senior officers' quarters	Yes	HSA 1999b, HSA 1999c	ASC 2003	Shaw 2005c	Pending
YB019	Qtrs 4	1901	Senior officers' quarters	Yes	HSA 1999b, HSA 1999c	ASC 2003	Shaw 2005c	Pending
YB019	Qtrs 5	1901	Senior officers' quarters	Yes	HSA 1999d	ASC 2003	Shaw 2005c	Pending
YB019	Qtrs 6	1903	Senior officers' quarters	Yes	HSA 1999b, HSA 1999c	ASC 2003	Shaw 2005c	Pending
YB019	Qtrs 7	1903	Senior officers' quarters	Yes	HSA 1999a, HSA 1999d	ASC 2003	Shaw 2005c	Pending
YB019	Qtrs 10	1948	Senior officers' quarters	Yes	Shaw 2005	Shaw 2005c	Shaw 2005c	Pending
YB019	57	1929	School, motel / temporary lodging (abandoned)	Assumed				No action required for closure
YB019	83	1918	2-car garage and apartment	Yes	HSA 1999d	NTE 1999b; ASC 2003	Shaw 2005c	Pending
YB019	142	1916	Gardener's tool shed, storage	Assumed				No action required for closure
YB019	200	1918	Transformer house	Assumed				No action required for closure

**TABLE 4: LEAD-BASED PAINT INFORMATION FOR BUILDINGS CONSTRUCTED BEFORE 1978 (Continued)**

Final, Finding of Suitability to Transfer, Yerba Buena Island

EBS Parcel	Building	Year Built	Use	LBP Present	LBP Assessment	Interior/Exterior LBP Abatement	Soil Abatement	Status at Time of FOST
YB019	205	1936	5-car garage	Assumed				No action required for closure
YB019	230	1944	Quarters 3-car garage	Yes	HSA 1999d	ASC 2003	Shaw 2005c	Pending
YB019	267	1947	Garage of Quarters 10	Yes				Pending

Notes:

ASC	Architectural Systems Corporation	Pending - Future assessment required.
EBS	Environmental baseline survey	
Forensic	Forensic Analytical Specialties, Inc	
FOST	Finding of Suitability to Transfer	
HSA	Health Science Associates	
IT	IT Corporation	
ITSI	Innovative Technical Solutions, Inc.	
LBP	Lead-based paint	
NA	Not applicable	
NTE	North Tower Environmental	
PWC	Public Works Center	
Qtrs	Quarters	
SSPORTS	Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment, Vallejo	
Shaw	Shaw Environmental and Infrastructure, Inc.	

## TABLE 4: LEAD-BASED PAINT INFORMATION FOR BUILDINGS CONSTRUCTED BEFORE 1978 (Continued)

Final, Finding of Suitability to Transfer, Yerba Buena Island

<b>EBS Parcel Building</b>	<b>Year Built</b>	<b>Use</b>	<b>LBP Present</b>	<b>LBP Assessment</b>	<b>Interior/Exterior LBP Abatement</b>	<b>Soil Abatement</b>	<b>Status at Time of FOST</b>
--------------------------------	-----------------------	------------	------------------------	---------------------------	--	---------------------------	-----------------------------------

References:

ACC Environmental Consultants (ACC). 1999a. Letter titled "Lead Clearance Report, Yerba Buena Island, Naval Station, Building 105A and 105B, San Francisco." From ACC Environmental Consultants. To Mr. Phillip Yates, IT Corporation. June 30.

ACC. 1999b. Letter titled "Lead Clearance Report, Yerba Buena Island, Naval Station, Building 109A and 109B, San Francisco." From ACC Environmental Consultants. To Mr. Phillip Yates, IT Corporation. June 30.

ACC. 1999c. Letter titled "Lead Clearance Report, Yerba Buena Island, Naval Station, Building 66, San Francisco." From ACC Environmental Consultants. To Mr. John McGwire, IT Corporation. September 21.

ACC. 1999d. Letter titled "Lead Clearance Report, Yerba Buena Island, Naval Station, Building 106A, 106B, San Francisco." From ACC Environmental Consultants. To Mr. John McGwire, IT Corporation. September 21.

ACC. 1999e. Letter titled "Revised Lead Clearance Report, Yerba Buena Island, Naval Station, Building 109A and 109B, San Francisco." From ACC Environmental Consultants. To Mr. John McGwire, IT Corporation. September 21.

ACC. 1999f. Letter titled "Lead Clearance Report, Yerba Buena Island, Naval Station, Building 113A and 113B, San Francisco." From ACC Environmental Consultants. To Mr. John McGwire, IT Corporation. September 21.

ACC. 1999g. Letter titled "Lead Clearance Report, Yerba Buena Island, Naval Station, Building 115A and 115B, San Francisco." From ACC Environmental Consultants. To Mr. John McGwire, IT Corporation. September 21.

AFA Construction Inc. 1998. Letter from David Klemme, Project Manager, AFA Construction, Inc. to Alla Lyubovny, Engineering Field Activity West, Navy regarding, X-ray fluorescence (XRF) testing results at Quarters 60, 66, 105, 115, 240. July 8.

AFA Construction, Inc. 1999. "Drip Line Soil Results, Non-Historic and Pre-1960 Housing, NAVSTA, San Francisco, California." January 22.

Architectural Systems Corporation (ASC). 2003. "Lead-Based Paint Abatement at the Nimitz Complex, Treasure Island, San Francisco, California, Contract No. N62474-98-C-2075, Vol. 1 and 2." January.

Forensic 1998b. "Lead-Based Paint Risk Assessment, 36 Residential and 5 Non-Residential Units Yerba Buena Island San Francisco, California." September 11.

Health Science Associates (HSA). 1999a. Transmittal from Robert Bacci, Health Science Associates, to Daniel Rabier, NSTI LBP Abatement with Quarters 7 Risk Assessment. March 5.

HSA. 1999b. Letter from Stephen C. Davis, Senior Vice President, Health Science Associates to Robert Boebel, Senior Managing Associate, Tectonics Architects. Regarding, Addendum to the Treasure Island Officers Quarters Abatement Schedules for Quarters: 2,3,4 and 6. March 22.

HSA. 1999c. Health Science Associates. 1999. Fax Report from Robert Bacci, Health Science Associates, to Bob Boebel, attaching compliance schedules for Quarters 2,3,4 and 6. June 11.

**TABLE 4: LEAD-BASED PAINT INFORMATION FOR BUILDINGS CONSTRUCTED BEFORE 1978 (Continued)**

Final, Finding of Suitability to Transfer, Yerba Buena Island

<b>EBS Parcel</b>	<b>Building</b>	<b>Year Built</b>	<b>Use</b>	<b>LBP Present</b>	<b>LBP Assessment</b>	<b>Interior/Exterior LBP Abatement</b>	<b>Soil Abatement</b>	<b>Status at Time of FOST</b>
HSA. 1999d. Fax Report from Robert Bacci, Health Science Associates, to Bob Boebel, attaching compliance schedules for Quarters 5, 7, and Buildings 83, 230 and 205. June 16								
IT Corporation. 2001. "Final Field Activity Report, Building 66 Lead-Contaminated Soil Remediation, Yerba Buena Island, NAVSTA TI, San Francisco." March 11.								
IT Corporation. 2002. "Final Field Activities Report, Building 240 Lead-Contaminated Soil Remediation, Yerba Buena Island, NAVSTA TI, San Francisco, CA." July 15.								
Innovative Technical Solutions, Inc. 2004 (ITSI). 2004. "Final LBP Reevaluation Report for Yerba Buena Island Housing, Former NAVSTA TI, San Francisco, California." October 1.								
North Tower Environmental (NTE). 1999a. "Clearance Wipe Sampling Results Nimitz Complete Quarters No. 1 - Yerba Buena Island." July 8.								
NTE. 1999b. "Clearance Wipe Sampling Results Nimitz Complete Quarters No. 83 - Yerba Buena Island." Sept. 8.								
PWC. 1996f. "Lead Management Plan Townhouse Multiplex." San Francisco Bay. May.								
Shaw Environmental Inc. (Shaw). 2005c. "Final Field Activity Report Lead-Contaminated Soil Remediation Officers Quarters 1 through 7 and 10, and Buildings 62, 83, 205, and 230, Yerba Buena Island." May 30.								
Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment Vallejo (SSPORTS). 1999b. "Field Summary Report - Lead-Based Paint in Soil Abatement Action at 60 Yerba Buena, 66 Yerba Buena, 113 Forest, and Playground #5, DoD Housing Naval Station Treasure Island." September.								

**TABLE 5: INVENTORY OF EQUIPMENT WITH DIELECTRIC FLUID THAT MAY CONTAIN PCBs**

Final, Finding of Suitability to Transfer, Yerba Buena Island

<b>EBS Parcel</b>	<b>Identification</b>	<b>Equipment Type</b>	<b>Equipment Status</b>	<b>Equipment Serial Number</b>	<b>Navy Number</b>	<b>Staining</b>	<b>Closure Document</b>	<b>ECP Area Type</b>
YB001	PCB-6698142	Oil-filled transformer	Removed	6698142	Unknown	Unknown	PWC 1995	1
YB004	PCB C503472	Oil-filled transformer	Removed	C503472	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
YB004	PCB TX-184	Oil-filled transformer	Present	85V5953	TX-184	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB TX-185A	Oil-filled switch	Present	Y-138A	TX-185A	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB TX-185B	Oil-filled transformer	Present	Y-138B	TX-185B	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB TX-186A	Oil-filled switch	Present	Y-136A	TX-186A	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB TX-186B	Oil-filled transformer	Present	Y-136B	TX-186B	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB TX-188A	Oil-filled switch	Present	Y-144A	TX-188A	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB TX-188B	Oil-filled transformer	Present	Y-144B	TX-188B	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB TX-189A	Oil-filled transformer	Present	Unknown	TX-189A	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB TX-189B	Oil-filled switch	Present	Unknown	TX-189B	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB TX-191A	Oil-filled switch	Present	81248	TX-191A	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB TX-191B	Oil-filled transformer	Present	83V2468	TX-191B	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB WAP-62641	Dry transformer	Not located	WAP-62641	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
YB004	PCB Y-140A	Oil-filled switch	Present	Y-140A	Y-140A	None	SULLIVAN/Tetra Tech 2004	1
YB004	PCB Y-140B	Oil-filled switch	Present	Y-140B	Y-140B	None	SULLIVAN/Tetra Tech 2004	1

**TABLE 5: INVENTORY OF EQUIPMENT WITH DIELECTRIC FLUID THAT MAY CONTAIN PCBs (Continued)**

Final, Finding of Suitability to Transfer, Yerba Buena Island

<b>EBS Parcel</b>	<b>Identification</b>	<b>Equipment Type</b>	<b>Equipment Status</b>	<b>Equipment Serial Number</b>	<b>Navy Number</b>	<b>Staining</b>	<b>Closure Document</b>	<b>ECP Area Type</b>
YB005	PCB 11-1956A	Switch	Present	11-1956A	11-1956A	None	SULLIVAN/Tetra Tech 2004	1
YB005	PCB 11-1956B	Switch	Present	11-1956B	11-1956B	None	SULLIVAN/Tetra Tech 2004	1
YB005	PCB 11-1956C	Switch	Present	11-1956C	11-1956C	None	SULLIVAN/Tetra Tech 2004	1
YB005	PCB TX-187A	Oil-filled transformer	Present	2973160	TX-187A	None	SULLIVAN/Tetra Tech 2004	1
YB005	PCB TX-187B	Oil-filled transformer	Present	2973425	TX-187B	None	SULLIVAN/Tetra Tech 2004	1
YB005	PCB TX-187C	Oil-filled transformer	Present	4973426	TX-187C	None	SULLIVAN/Tetra Tech 2004	1
YB007	PCB TX-190	Oil-filled transformer	Present	76J315006	TX-190	None	SULLIVAN/Tetra Tech 2004	1
YB007	PCB YB007	Oil-filled switch	Present	Unknown	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB011	PCB COY-126A	Oil-filled fuse cut-out	Present	COY-126A	COY-126A	None	SULLIVAN/Tetra Tech 2004	1
YB011	PCB COY-126B	Oil-filled fuse cut-out	Present	COY-126B	COY-126B	None	SULLIVAN/Tetra Tech 2004	1
YB011	PCB COY-126C	Oil-filled fuse cut-out	Present	COY-126C	COY-126C	None	SULLIVAN/Tetra Tech 2004	1
YB011	PCB TX-192A	Oil-filled pad-mounted transformer	Present	TX-192A	TX-192A	None	SULLIVAN/Tetra Tech 2004	1
YB011	PCB TX-192B	Oil-filled pad-mounted transformer	Present	TX-192B	TX-192B	None	SULLIVAN/Tetra Tech 2004	1
YB011	PCB TX-192C	Oil-filled pad-mounted transformer	Present	TX-192C	TX-192C	None	SULLIVAN/Tetra Tech 2004	1
YB015	PCB 2677060	Oil-filled transformer	Present	2677060	Unknown	None	SULLIVAN/Tetra Tech 2004	1

**TABLE 5: INVENTORY OF EQUIPMENT WITH DIELECTRIC FLUID THAT MAY CONTAIN PCBs (Continued)**

Final, Finding of Suitability to Transfer, Yerba Buena Island

<b>EBS Parcel</b>	<b>Identification</b>	<b>Equipment Type</b>	<b>Equipment Status</b>	<b>Equipment Serial Number</b>	<b>Navy Number</b>	<b>Staining</b>	<b>Closure Document</b>	<b>ECP Area Type</b>
YB015	PCB 6585265	Oil-filled transformer	Present	6585265	Unknown	None	SULLIVAN/Tetra Tech 2004	4
YB015	PCB 6586052	Oil-filled transformer	Present	6586052	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB015	PCB 89V5954	Oil-filled transformer	Present	89V5954	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB015	PCB Y-122A	Oil-filled fuse cut-out	Present	Y-122A	Y-122A	None	SULLIVAN/Tetra Tech 2004	1
YB015	PCB Y-122B	Oil-filled fuse cut-out	Present	Y-122B	Y-122B	None	SULLIVAN/Tetra Tech 2004	1
YB015	PCB Y-122C	Oil-filled fuse cut-out	Present	Y-122C	Y-122C	None	SULLIVAN/Tetra Tech 2004	1
YB015	PCB Y-128A	Oil-filled fuse cut-out	Present	Y-128A	Y-128A	None	SULLIVAN/Tetra Tech 2004	1
YB015	PCB Y-128B	Oil-filled fuse cut-out	Present	Y-128B	Y-128B	None	SULLIVAN/Tetra Tech 2004	1
YB015	PCB Y-128C	Oil-filled fuse cut-out	Present	Y-128C	Y-128C	None	SULLIVAN/Tetra Tech 2004	1
YB016	PCB TX-326	Oil-filled pad-mounted transformer	Present	362095	TX-326	None	SULLIVAN/Tetra Tech 2004	1
YB016	PCB TX-327	Oil-filled transformer	Present	360114	TX-327	None	SULLIVAN/Tetra Tech 2004	1
YB016	PCB TX-328	Oil-filled transformer	Present	360111	TX-328	None	SULLIVAN/Tetra Tech 2004	1
YB016	PCB Y-120 A0	Oil-filled switch	Present	Y-120 A0	Y-120 A0	None	SULLIVAN/Tetra Tech 2004	1
YB016	PCB Y-120 B0	Oil-filled switch	Present	Y-120 B0	Y-120 B0	None	SULLIVAN/Tetra Tech 2004	1
YB016	PCB Y-120 C0	Oil-filled switch	Present	Y-120 C0	Y-120 C0	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB 14016-1	Oil-filled transformer	Not located	14016-1	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1

**TABLE 5: INVENTORY OF EQUIPMENT WITH DIELECTRIC FLUID THAT MAY CONTAIN PCBs (Continued)**

Final, Finding of Suitability to Transfer, Yerba Buena Island

<b>EBS Parcel</b>	<b>Identification</b>	<b>Equipment Type</b>	<b>Equipment Status</b>	<b>Equipment Serial Number</b>	<b>Navy Number</b>	<b>Staining</b>	<b>Closure Document</b>	<b>ECP Area Type</b>
YB019	PCB 14016-2	Oil-filled transformer	Not located	14016-2	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB 14016-3	Dry transformer	Not located	14016-3	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB 4142090	Oil-filled transformer	Not located	4142090C	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB 4142092	Oil-filled transformer	Not located	4142092A	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB 4327121	Oil-filled transformer	Not located	4327121B	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB 62045 B0	Oil-filled switch	Removed	62045B	62045 B0	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB 62046 A0	Oil-filled switch	Removed	62046A	62046 A0	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB 62047 C0	Oil-filled switch	Removed	62047C	62047 C0	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB D8078-2 A	Oil-filled switch	Present	D8078-2 A	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB D8078-2 B	Oil-filled switch	Present	D8078-2 B	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB D8078-2 C	Oil-filled switch	Present	D8078-2 C	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB TX-252	Oil-filled transformer	Present	Unknown	TX-252	Staining	SULLIVAN/Tetra Tech 2004	4
YB019	PCB TX-253	Oil-filled transformer	Present	Unknown	TX-253	Staining	SULLIVAN/Tetra Tech 2004	1
YB019	PCB TX-254	Oil-filled transformer	Present	Unknown	TX-254	Staining	SULLIVAN/Tetra Tech 2004	1
YB019	PCB Y-118 A	Oil-filled switch	Present	Y-118 A	Y-118 A	None	SULLIVAN/Tetra Tech 2004	1
YB019	PCB Y-118 B	Oil-filled switch	Present	Y-118 B	Y-118 B	None	SULLIVAN/Tetra Tech 2004	1

**TABLE 5: INVENTORY OF EQUIPMENT WITH DIELECTRIC FLUID THAT MAY CONTAIN PCBs (Continued)**

Final, Finding of Suitability to Transfer, Yerba Buena Island

EBS Parcel	Identification	Equipment Type	Equipment Status	Equipment Serial Number	Navy Number	Staining	Closure Document	ECP Area Type
YB019	PCB Y-118 C	Oil-filled switch	Present	Y-118 C	Y-118 C	None	SULLIVAN/Tetra Tech 2004	1
YB022	PCB COY-150A	Switch	Present	COY-150A	Y-150A	None	SULLIVAN/Tetra Tech 2004	1
YB022	PCB COY-150B	Switch	Present	COY-150B	Y-150B	None	SULLIVAN/Tetra Tech 2004	1
YB022	PCB COY-150C	Switch	Present	COY-150C	Y-150C	None	SULLIVAN/Tetra Tech 2004	1
YB022	PCB TX-423	Oil-filled transformer	Present	P0734-1	TX-423	None	SULLIVAN/Tetra Tech 2004	1
YB022	PCB TX-501	Oil-filled transformer	Present	PWJ-0845	TX-501	None	SULLIVAN/Tetra Tech 2004	1
YB022	PCB YB022A	Oil-filled pad-mounted transformer	Present	Unknown	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB022	PCB YB022B	Oil-filled pad-mounted transformer	Present	Unknown	Unknown	None	SULLIVAN/Tetra Tech 2004	1
YB022	PCB YB022C	Oil-filled pad-mounted transformer	Present	Unknown	Unknown	None	SULLIVAN/Tetra Tech 2004	1

Notes:

-- Not closed  
 EBS Environmental baseline survey  
 ECP Environmental condition of property  
 PCB Polychlorinated biphenyl  
 SULLIVAN Sullivan Consulting Group  
 Tetra Tech Tetra Tech EM Inc.

References:

SULLIVAN/Tetra Tech. 2004. "Draft PCB Summary Report, Former Naval Station Treasure Island, San Francisco, California." November  
 PWC. 1995. "PWCFCB Inventory List #2 of 19 Switches and 171 Transformers of Primary High Voltage Electrical Distribution System. List of Oil Filled Electrical Equipment for NAVSTA TI." May 1.

**TABLE 6: SUMMARY OF CERCLA HAZARDOUS SUBSTANCES STORED, RELEASED, OR DISPOSED OF IN THE YBI TRANSFER PARCEL**

Final, Finding of Suitability for Transfer, Yerba Buena Island

Location	Substances	CAS Number	Regulatory Synonym	RCRA Waste	Reportable Quantity (kg)	Quantity	Units	Stored, Released, or Disposed Of	Action Taken
YB019	Corrosives	NA	Unknown	Unknown	NA	Unknown	NA	Stored	Removed
YB022	Corrosives	NA	Unknown	Unknown	NA	Unknown	NA	Stored	Removed

Notes:

CAS Chemical Abstract System  
 kg Kilogram  
 NA Not applicable  
 Navy U.S. Department of the Navy  
 RCRA Resource Conservation and Recovery Act  
 YBI Yerba Buena Island

**APPENDIX A**  
**RESPONSE TO COMMENTS**

---

## **RESPONSES TO COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER FOR PROPERTY ON YERBA BUENA ISLAND NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA**

---

This document presents the Navy's responses to comments from the regulatory agencies, the City and County of San Francisco, and members of the Naval Station Treasure Island (NAVSTA TI) Restoration Advisory Board (RAB) on the revised Draft Finding of Suitability to Transfer (FOST) for Property on Yerba Buena Island (YBI), NAVSTA TI, San Francisco, California, dated August 8, 2005. The comments addressed below were received from the California Environmental Protection Agency (Cal EPA) Department of Toxic Substances Control (DTSC) on September 1, 2005; the Cal EPA San Francisco Bay Regional Water Quality Control Board (Water Board) on August 31, 2005; and the City and County of San Francisco (City) on behalf of the Treasure Island Development Authority (TIDA) on September 12, 2005. Additionally, comments were received from Ms. Dale Smith, RAB member, on September 7, 2005; Mr. Nathan Brennan, RAB member, on September 6, 2005; and the State of California, the Resource Agency, Department of Parks and Recreation on August 23, 2005. No comments were received from the U.S. Environmental Protection Agency (EPA).

### **RESPONSES TO COMMENTS FROM THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

#### **General Comments**

- 1. Comment:** The Department of Toxic Substances Control (DTSC) staff completed its review of the Draft Finding of Suitability Transfer (FOST) for Property on Yerba Buena Island (YBI), dated August 8, 2005 and prepared by SulTech. The purpose of the FOST is to document certain parcels of real property comprising part of Naval Station Treasure Island as environmentally suitable for transfer by deed under Section 120(h) of the Comprehensive Environmental Response, Compensation and Liability Act in a manner that is protective of human health and the environment.

The YBI transfer parcel, located along the southwest portion of YBI, includes portions or all of Environmental Baseline Survey parcels: YBI001 through YB009 and YB011 through YB024. The YBI transfer parcel comprises approximately 77 acres and includes a total of 49 buildings.

As a part of the transfer of lands on YBI, DTSC requires that lead contamination and Polychlorinated Biphenyls remaining in place need to be addressed through the execution and recordation of a Land Use Covenant (LUC). This LUC is required pursuant to Title 22, California Code of Regulations, Section 67391.1, and may be entered into with the U.S Navy or the transferee, at the time of property transfer, during the escrow process.

- Response:** For pre-1978 residential buildings, lead-based paint (LBP) restrictions will be imposed consistent with those outlined in [Section 8.2.5.1](#) in the revised draft (and final) FOST.

For pre-1978 non-residential buildings, the first two paragraphs of Section 8.2.5.2 has been revised as follows:

“For pre-1978 non-residential buildings, the transferee will be required to restrict uses of these buildings to non-residential uses until the buildings are demolished. If a building or land is to be used or developed for residential use, the constituents driving risk, namely LBP on interior/exterior building surfaces or in soils, must be abated and the remedy must demonstrate protection of human health for residential use.”

“Pursuant to the existing memorandum of agreement executed in March 2000 between the Navy and the DTSC, the Navy will also grant to DTSC a covenant providing the DTSC with enforcement authority (DTSC 2000). A future transferee wishing to release the restriction would be obliged to abate LBP on interior/exterior building surfaces and/or in soils and petition, both the Navy and the DTSC independently, to obtain a release of the restriction from each party.”

For polychlorinated biphenyls (PCB), [Section 8.2.10](#) has been revised as follows:

“PCBs have been detected according to TSCA criteria, at elevated levels in electrical transformer vaults in currently unoccupied Buildings 118 (Transformer 6585265) and 200 (Transformer TX-252) within the FOST parcel. The table below presents the current locations of transformers in vaults, associated transformer identification numbers, and the maximum PCB concentrations reported in samples collected from areas adjacent to the transformer locations. The Navy will address these transformers located inside these vault buildings by restricting access to the vaults to low occupancy uses or other actions consistent with TSCA. Any modifications to the vaults must comply with all regulations regarding PCBs, as appropriate. If the Navy determines additional remedial activities are appropriate, these activities will be performed before transfer.”

## Specific Comments

### 1. Comment: Page 1, Section 1.1, Introduction

**The third paragraph of the introduction states that, “A release of CERCLA hazardous substances did occur within the YBI transfer parcel; however, these substances were detected at concentrations that did not require a response action other than a land use restriction.” Upon further review of the FOST, DTSC staff were unable to find another reference to the CERCLA releases mentioned in the introduction and requests the Navy provide more details regarding this release, and specifically, why a restriction is needed to protect public health and the environment. Moreover, DTSC**

**considers land use controls, such as a deed restriction, to be a CERCLA remedy and if a release did occur that necessitates restriction property to uses other than un-restricted residential, then the property in question cannot be considered suitable for transfer as a part of this FOST.**

**Response:** The second paragraph of [Section 1.1](#), the introduction has been revised to clarify that the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) constituents include PCBs; however, PCB releases from electrical transformers will be addressed under the Toxic Substances Control Act (TSCA). Elevated PCBs were detected above TSCA criteria at two electrical transformer vault locations at YBI and require restrictions. The text has been revised as follows:

“Petroleum contamination in groundwater and soil and polychlorinated biphenyl (PCB) releases from electrical transformers are the only ongoing environmental issues within the YBI transfer parcel. Under CERCLA, the federal government must warrant that all remedial action necessary to protect human health and the environment has been completed with respect to CERCLA hazardous substances prior to transfer of properties by deed. However, the definition of CERCLA hazardous substances does not include petroleum products or derivatives. As a result, remediation and regulatory closeout of petroleum-contaminated sites can be conducted in parallel with, and subsequent to, property transfer. Similarly, while PCBs are considered a CERCLA hazardous substance, the existing PCB leaks from electrical transformers inside buildings within the FOST parcels are not likely to result in a release to the environment and will be addressed pursuant to the Toxic Substances Control Act (TSCA). To expedite property transfer and redevelopment activities, the YBI transfer parcel will be transferred before corrective actions for petroleum and PCB contamination and regulatory closures are completed. This FOST report addresses potential human health and environmental risks that may exist from exposure to petroleum and PCB contamination at the YBI transfer parcel (1) under current conditions, and (2) while the petroleum and PCB corrective actions are ongoing.”

The first sentence of the third paragraph has been removed for clarity. Restrictions imposed to be protective of human health for PCBs present in electrical transformers vaults within the FOST parcel are not CERCLA remedies and are being imposed pursuant to TSCA.

**2. Comment: Page 17, Section 2.0, Property Description**

**This section states that Table 1 lists the individual acreages of the transfer parcels but after reviewing the table, no acreages were found. Please include the individual acreages in Section 2.0 and Table 1.**

**Steam lines should be added to the list of utilities located on Yerba Buena Island.**

**Response:** Because there is only one transfer parcel within the YBI transfer area, the estimated 77 acres is the total acreage suitable for transfer at this time. The text has been revised as follows:

“[Table 1](#) lists the individual EBS parcels within the YBI transfer parcel.”

And the text regarding utilities at YBI, has been revised as follows:

“Utilities in the YBI transfer parcel include steam lines, sanitary sewer lines, storm drain lines, and electric, water, and natural gas lines.”

**3. Comment: Page 21, Section 6.1.2, Underground Storage Tank 66**

**Please explain why UST 66 requires a notice and restriction at transfer, after receiving a closure letter from the Water Board, and why the remaining UST sites, have also received closure letters do not need notices and restrictions.**

**Response:** Clarification for the deed notice and restriction for underground storage tank (UST) 66 has been added to [Section 6.1.2](#). as follows:

“The 1988 preliminary assessment/site inspection report mentioned the possibility that an underground storage tank (UST) was adjacent to Building 66 (Dames and Moore 1988). The UST was discovered during a remedial excavation near Building 66 to remove petroleum hydrocarbon-impacted surface soils. The UST discovered during the excavation is located underneath a concrete structure retaining wall. Because of the location of the tank and the steepness of the hillside behind Building 66, UST 66 was closed-in-place ([Table 3](#)). Although no restrictions were identified in the corrective action plan (CAP) or Closure Report, the Navy determined the site requires a restriction based on residual petroleum contamination.

The Water Board submitted a closure letter concurring with no further action (NFA) for UST 66 to the Navy in October 2002 (Water Board 2002b). UST 66, located within the YBI transfer parcel, requires a notice and restriction to be put in place at the time of transfer (see [Sections 8.1.4 and 8.2.7](#)). No other UST sites in the FOST parcel contain residual petroleum contamination that require restrictions.”

**4. Comment: Page 23, Section 6.1.4.1, Residential Housing**

**While DTSC recognizes the Navy’s extensive remedial efforts at Quarters 1 through 7, to address lead in exposed soil surrounding the structures, DTSC is also aware that lead contamination remains in place adjacent to the buildings beneath hardscaping (i.e., building foundations, side walks, driveways) at concentrations that exceed action levels and that will require a deed restriction.**

**Please also discuss what is meant by the term “*hazard control treatments*” and identify where they were put in place, both in text and on a figure. If lead contamination remains in soil at concentrations that could pose a risk to future user of the property, DTSC will be unable to conclude that all remedial actions necessary to protect public health and the environment have been completed.**

**Response:** The Navy abatement of lead in soil from LBP at residential structures has met or exceeded all Housing and Urban Development (HUD) and U.S. Department of Defense (DoD) guidance. The Navy has addressed lead in bare soil and beneath softscape such as grass and other vegetative groundcover as reported in Shaw Environmental, Inc.’s (Shaw) May 30, 2005, *Final Field Activity Report, Lead-Contaminated Soil Remediation, Officers Quarters 1 through 7 and 10, and Buildings 62, 83, 205 and 230*. Although the HUD and DoD guidance do not require deed restrictions for lead in soil under building foundations, concrete, or asphalt, the Navy has modified the third paragraph of [Section 8.2.5.1](#) to read as follows:

“Soil under hardscape adjacent to residential housing built before 1978 (scheduled for demolition and planned for residential redevelopment after transfer of the YBI transfer parcel) must be evaluated for LBP hazards. The Transferee will evaluate the soil for lead hazards after the existing residential buildings, structures, or facilities and paved surfaces surrounding the residential buildings, structures, or facilities are demolished. The Transferee will conduct abatement of lead hazards identified in soil before the new residential buildings, structures, or facilities are occupied or within 3 months of removal of hardscape adjacent to residential housing units occupied by children (DoD 1999).”

A new fourth sentence has been inserted in the fourth paragraph of [Section 6.1.4.1](#) to read, “Hazard control measures have included encapsulation of interior/exterior LBP surfaces on Pre-1960 residential buildings within the FOST parcel.”

**5. Comment Page 30, Section 6.2.8, Adjacent Properties**

**The location of the dry cell battery debris should also include EBS Parcel YB017.**

**Response** Comment noted. The last paragraph of [Section 6.2.8](#) has been revised as follows:

“Caltrans uncovered debris containing dry cell batteries in EBS Parcels YB017 and YB022 during excavation of a utility trench in 2002. The area is referred to as the Battery Site. As part of the data gaps investigation, the Navy further characterized YB017 and YB022 to assess the extent of chemicals of potential concern. The area will undergo further investigation after Caltrans has completed construction on the Bay Bridge (Shaw 2005a). This area was removed from the YBI transfer parcel (see [Figure 3](#)). The boundary contains sufficient buffer to prevent migration of contaminants onto the YBI transfer parcel.”

**6. Comment** **Page 35, Section 8.2.4, Lead-Based Paint**

**Please see our general comments above.**

**Response** Comment noted.

**7. Comment** **Page 37, Section 8.2.9, Polychlorinated Biphenyls Restriction**

**Please see our general comments above.**

**Response** Comment noted.

## RESPONSES TO COMMENTS FROM THE REGIONAL WATER QUALITY CONTROL BOARD

### General Comments

- 1. Comment:** Regional Water Quality Control Board (Water Board) staff reviewed the subject document, which was received on August 9, 2005 and prepared by SulTech on behalf of the Navy. The document describes certain parcels of property of Yerba Buena Island that are environmentally suitable for transfer by deed under Section 120(h) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). To expedite property transfer and eventual redevelopment, the Navy proposes to transfer FOST areas before the corrective actions for petroleum and PCB contamination in soil and groundwater are completed.

The Navy proposes to issue a deed notice stating that residual petroleum contamination has been left in place at UST 66, and would impose restrictions against disturbing the soil below the current ground surface pending a Water Board approved soil management plan. The deed will also impose restrictions against disturbing the soil at an unspecified depth at Site YF3, pending regulatory closure.

We request that the residual petroleum left in place at the UST 66 and YF3 sites be treated similarly, that is, both should receive notices that material has been left in place and both sites should be subject to a Water Board approved soil management plan.

- Response:** A notice of residual petroleum contamination for UST 66 is currently included in the document. A second notice for residual petroleum contamination at Site YF3 has been added. Specifically, [Section 8.1.5](#) has been revised as follows:

“The deed will contain a notice that petroleum-impacted (diesel) soil remains in place at Site YF3. Soil restrictions are required, and temporary notifications and restrictions are required for groundwater at Site YF3.”

“The deed may also contain a notice that the Grantor may provide a Notice of Release, in recordable form, to the Grantee when the appropriate government regulatory agencies have confirmed, in writing, to the Grantee that such a prohibition on excavation, grading, removal, trenching, filling, earth movement, mining, or other disturbance of soil at the current ground surface of Site YF3 is no longer necessary.”

The restriction at Site YF3 in [Section 8.2.6](#) has been clarified as follows:

“The deed will contain a covenant by the Grantee on behalf of itself, its successors and assigns, or agents that, during the period from property transfer until regulatory closure and until the restriction is no longer necessary, no activities that will disturb the soil at the site shall be permitted within Inactive Fuel Line Site YF3, as shown on [Figure 5](#), without a Water Board and Navy approved soil management plan (SMP) or other appropriate document.”

RESPONSES TO COMMENTS FROM THE CITY AND COUNTY OF SAN FRANCISCO ON BEHALF OF  
THE TREASURE ISLAND DEVELOPMENT AUTHORITY

**General Comments**

1. **Comment:** *Clarification of Environmental Condition of Property (ECP) Types.* The July 8, 2005 Final Supplemental Environmental Baseline Survey (SEBS) classified several YBI transfer parcels as ECP Type 7 (areas that are not evaluated or require additional evaluation; e.g., YB001, YB004, YB016, YB017, YB022, and YB023). These same parcels are designated as ECP Types 2 and 3 in the FOST. Any differences between the ECP Type presented in the SEBS and those presented in this FOST should be explained in Section 5.0. Additionally, we note that Table 1 of the FOST shows parcel YB019 as ECP Type 3, whereas Figure 2 shows it as ECP Type 4. This discrepancy should be resolved.

**Response:** Environmental condition of property (ECP) area types listed within the FOST document are correct. The ECP area types listed on Table 1 are consistent with Section 7.3.4.4 of the 2005 supplemental environmental baseline survey (SEBS) with the exception of the error noted in Parcel YB019. The ECP type of environmental baseline survey (EBS) Parcel YB019 is correct as shown on Figure 2, as an ECP 4, and in Tables 7-1 and Figure 7-1D of the SEBS. Table 1 in the Final YBI FOST has been updated to reflect the correct ECP type (4). Section 7.2 of the SEBS clarifies the difference between ECP types of whole EBS parcels and portions of EBS parcels that are within a transfer parcel.

The final historical radiological assessment (HRA) did not identify any radiological issues within the YBI FOST transfer parcel (Weston 2006).

2. **Comment:** *Notice of Release.* There are two places where the text indicates that “The deed *may* (emphasis added) contain a notice that the Grantor will provide a Notice of Release....” (Last paragraph of Section 8.1.2 pertaining to asbestos containing material [ACM] notices and last paragraph of Section 8.1.5 pertaining to PCB notices). There should be no ambiguity about whether the notice will or will not be included. The Authority requests that the notice be included in the deed and, therefore, we request that the word “may” be replaced with the word “will.” We also request that the text state that future Notices of Release be granted on a building-by-building basis or site-by-site basis, as the need for notices/restrictions is removed from each building/site. Please revise the text (in both places) as follows “The deed *will* contain a notice that the Grantor will provide a Notice of Release, *on a building-by-building basis or site-by-site basis (whichever is applicable)*, in recordable form, to the Grantee at such time.....” We also request that the same notice about a Notice of Release be included

**in Section 8.1.3 (Lead-Based Paint Notices) and Section 8.1.4 (Residual Petroleum Contamination Notices for UST Site 66).**

**Response:** The FOST is not a property transfer document, nor does it constitute an agreement between the Navy and transferees. Rather, it is used to document that parcels of land are suitable for transfer. As such, it is inappropriate to indicate in the FOST that the Navy will provide a release for a restriction of FOST property that may or may not be present in the deed. The sections have not been revised as requested.

The Navy does not intend to use the FOST document to establish commitments for issues such as building-by-building releases of restrictions. Rather, such discussion (if appropriate) is appropriately addressed during real estate transfer negotiations.

**3. Comment:** *Lead-Based Paint. On August 23, 2005, consultants to the Authority spoke by telephone with representatives from the Navy to obtain clarification requirements to address lead-based paint (LBP) hazards. Our comments reflect this conversation.*

**3.1. Comment:** *The document should clearly define the terms “abatement” and “control measures” and the text should be reviewed to ensure that the terms are consistently used throughout the document.*

**Response:** 3.1. The following text has been inserted before the last paragraph in [Section 6.1.4](#):

“Title X defines LBP hazard control measures (interim controls) as ‘a set of measures designed to reduce temporarily human exposure or likely exposure to lead-based paint hazards, including specialized cleaning, repairs, maintenance, painting, temporary containment, ongoing monitoring of lead-based paint hazards or potential hazards, and the establishment and operation of management and resident education programs.’ Title X defines LBP abatement as any set of measures designed to permanently eliminate LBP hazards. EPA and U.S. Department of Housing and Urban Development (HUD) consider permanent LBP hazard control measures as those that last at least 20 years (DoD 1999). LBP hazards identified during the original risk assessment conducted on the pre-1960 YBI residential buildings have been addressed through either hazard control measures or abatement.”

**3.2. Comment:** *The list of buildings where lead-affected soil has been addressed by the Navy (last paragraph of Section 6.1.4.1) should include Quarters 10.*

**Response:** 3.2. The text in the final paragraph of [Section 6.1.4.1](#) has been replaced with the language below to clarify that Quarters 10 is included, as well as to clarify that the Navy addressed lead in soils through excavation:

“The lead-contaminated soil at Quarters 1 through 7 and 10, and Buildings 62, 66, 83, 205, 230, and 240 has been abated to be protective of residential use of the buildings in accordance with Title X using HUD guidelines and joint DoD/EPA guidance (DoD 1999). In addition, the Navy has exceeded HUD and joint DoD/EPA guidance by addressing LBP in soil around Quarters 1 through 7 and 10. Soil removal activities have removed soil to a minimum of 2 feet below ground surface (bgs), and most of the excavations have been conducted to depths of 3 to 4 feet bgs based on confirmation sampling (Shaw 2005b). Soil under hardscape (buildings, foundations, sidewalks, and driveways) at Quarters 1 through 7 and 10 is not required to be abated to be protective of residential use of the buildings in accordance with Title X using HUD guidelines and joint DoD/EPA guidance (DoD 1999). Both a notice and restriction are required. The restriction will require that hardscape must be managed and maintained, and in the event of the removal of hardscape surrounding Quarters 1 through 7 and 10, would require investigation of soils beneath hardscape as required by local, state and federal regulations.”

**3.3. Comment:** **Section 8.2.4.1 indicates that an LBP risk assessment or reevaluation of pre-1978 residential housing units will be conducted within 1 year before the property is transferred. The document should explain what will be included in the assessment/reevaluation and who will be conducting the assessment/reevaluation. Based on information from the August 23, 2005 telephone conversation, we understand that the Navy will conduct the assessment/reevaluation, most likely in April/May 2006, and the assessment/reevaluation will consist of records review, visual inspections and wipe sampling.**

**Response:** 3.3. The first paragraph of [Section 8.2.5.1](#) has been revised as follows:  
“In accordance with DoD policy (DoD 2000), the Navy will conduct a LBP risk assessment or reevaluation of pre-1978 residential housing units within 1 year before the property is transferred. The deed will contain a restriction that the grantee must conduct any necessary abatement of LBP hazards identified in unleased pre-1960 residential buildings before the buildings can be occupied. LBP hazards identified in the leased pre-1960 residential buildings must be abated within 1 year of the assessment, and abatement will be made a condition of the property transfer.”

**3.4. Comment:** **Based on the visual inspections documented in the July 8, 2005 SEBS, flaking LBP was observed on both the interior and exterior of Quarters 2. Based on the August 23, 2005 telephone conversation, we**

**understand the Navy plans to re-paint the exterior of un-leased buildings where soil removal was conducted (including Quarters 2). It would be helpful to include this information in the FOST.**

**Response:** 3.4. The Navy is currently applying hazard control measures (20 year encapsulating paint) to the LBP hazards identified on the exteriors of the pre-1960 unleased residential buildings on YBI (including Quarters 2). The following text has been added to the paragraph in [Section 6.1.4.1](#):

“A reevaluation of LBP at all residential buildings on YBI was conducted in April and May 2004 (Innovative Technical Solutions, Inc. [ITSI] 2004). The process of a LBP reevaluation is (1) review records to identify locations of LBP; (2) visually determine if there is deteriorated LBP; and (3) collect composite wipe samples to determine if hazardous lead dust levels exist. Assessment of LBP control treatments used on interiors, exteriors, and common areas known to contain LBP were part of the reevaluation; however, assessment of lead in soils was not part of the reevaluation (ITSI 2004). All LBP hazards identified during the 2004 reevaluation in the leased pre-1960 residential buildings either have been or will be abated and/or hazard control measures applied by the Treasure Island Development Authority (TIDA) per the lease agreement, and TIDA must give notice of LBP hazards to residents of the post-1960 buildings per the Finding of Suitability to Lease agreement and HUD guidelines (PRC Environmental Management, Inc. [PRC] 1997c, Tetra Tech and U&A 1998, Title X HUD). LBP hazards identified during the 2004 reevaluation on the exterior of the unleased pre-1960 residential buildings had hazard control measures applied in December 2005. Any new LBP hazards identified in the pre-1960 residential buildings during the reevaluation to support property transfer will require abatement and/or hazard control measures and will be made a condition of the property transfer before the buildings can be occupied (DoD 1999).”

**3.5. Comment:** We have reviewed comments on the YBI FOST that were recently submitted by Department of Toxic Substances Control (DTSC) in a September 1, 2005 letter. According to DTSC, lead-contaminated soil that remains beneath hardscaping will require a deed restriction. The letter further states “If lead contamination remains in soil at concentrations that could pose a risk to future users of the property, DTSC will be unable to conclude that all remedial actions necessary to protect public health and the environment have been completed.” We request that this issue be addressed by the Navy. It would place the Authority in an untenable position for the Navy to offer parcels to the Authority if DTSC is on record stating that the parcels have not been fully remediated. If a deed restriction is in fact used by the Navy, we also note that DTSC will likely require a Land Use Covenant Implementation and Enforcement Plan that identifies responsible parties for administering and enforcing any land use covenants. In

addition, DTSC will likely require an agreed-upon mechanism to ensure that all costs associated with the implementation and enforcement be accounted for prior to recording the covenant. Given this approach by DTSC, we feel it is even more important for the Navy to remediate lead contaminated soil such that a land use covenant can be avoided.

**Response:** 3.5. Please see the response to DTSC Specific Comment 4. The Navy will impose a land-use control as a matter of courtesy to address DTSC's concerns; however, please note that Navy abatement of lead in soil around Quarters 1 through 7 and 10 has exceeded all HUD guidelines and DoD policy requirements, and further abatement as suggested by the TIDA's comment cannot be justified.

4. **Comment:** *Petroleum Restrictions.* We have several comments pertaining to petroleum restrictions.

**Ongoing Petroleum Corrective Actions (Section 8.2.5)**

4.1 **Comment:** The first paragraph in this section should clarify that the only area with ongoing petroleum corrective actions is Site YF3. In the second paragraph, it appears that the proposed deed covenant applicable to Site YF3 will be required until two independent criteria are met: (1) regulatory closure has been obtained, and (2) the restriction is no longer necessary. Please clarify that the restriction will no longer be necessary and will be removed when regulatory closure has been obtained. We have reviewed the August 31, 2005 Regional Water Quality Control Board (Water Board) FOST comments and note that they are requesting a soil management plan (SMP) for Site YF3 because petroleum-affected soil currently remains in place. To the extent the Water Board requires a SMP for Site YF3, we request that the FOST clarify that the SMP may no longer be necessary after remediation has been completed and closure has been obtained. We also request that the FOST clarify how the Navy plans on developing and implementing the SMP for Site YF3 and how the Navy plans on coordinating with the Authority and the City and County of San Francisco regarding development and implementation of the SMP.

**Response:** 4.1.(a) The first paragraph in [Section 8.2.6](#) has been revised to clarify that the only area with unresolved petroleum corrective actions is Site YF3 as follows:

“Petroleum contamination in groundwater and soil within part of the YBI transfer parcel is being addressed by remediation and regulatory closeout. The YBI transfer parcel will be transferred before regulatory closure is attained at the only remaining petroleum site, Inactive Fuel Line Site YF3, that has not received regulatory closure. Restrictions are necessary at this

site to address potential human health and environmental risks that may exist from exposure to petroleum contamination at the YBI transfer parcel (1) under current conditions and (2) while the petroleum corrective action is ongoing. [Figure 5](#) shows the location of Site YF3 requiring a restriction.”

4.1.(b) The Navy cannot presume as suggested in the comment that the restriction will no longer be necessary and will be removed when regulatory closure has been obtained because it is possible that restrictions may be found to be necessary as part of regulatory closeout.

4.1.(c) The FOST is not the appropriate document to discuss the future of a site management plan at Site YF3, that is a determination to be made in the future, based on the closure report and the Water Board’s site closure determination. The restriction prohibits soil disturbance without a Water Board-approved soil management plan (SMP), but it does not require the development of an SMP. The Navy has no plans to develop an SMP and any such plan, if developed, would be the responsibility of the Grantee.

**4.2 Comment:** **As written, the second paragraph appears to prohibit any activities that disturb soil within Site YF3 until regulatory closure has been obtained. The Navy and the Authority have agreed that the Authority will complete investigation and remediation activities at Site YF3 following transfer. Both investigation and remediation activities will require disturbance of soil. We request that the text clarify that the restriction does not apply to investigation and remediation activities that will be conducted by the Grantee to obtain regulatory closure of the site. We also request that there be a reasonable mechanism to allow for disturbance of subsurface soils for other reasons (e.g., utility repair), if such disturbance is necessary before the restriction is removed.**

**Response:** 4.2. See the response to Comment 4.1(a) above. Further, with respect to the stated agreement between TIDA and the Navy for the TIDA to complete investigation and remediation activities for Inactive Fuel Line Site YF3, no such written agreement has been executed as yet; therefore, the Navy cannot presume that the agreement will be executed within the context of this FOST.

The text of [Section 8.2.6](#) has been revised to include a restriction including a Water Board approved SMP as follows:

“The deed will contain a covenant by the Grantee on behalf of itself, its successors and assigns, or agents, that, during the period from property transfer until regulatory closure and until the restriction is no longer necessary, no activities that will disturb the soil at the site shall be permitted within Inactive Fuel Line Site YF3, as shown on [Figure 5](#) without a Water Board and Navy approved soil management plan (SMP) or other appropriate document.”

### Completed Petroleum Corrective Actions (Section 8.2.6)

**4.3 Comment:** The area requiring the restriction (only UST 66) should be explicitly described in the text (precise location and dimensions of the area) and a figure should be prepared that clearly shows the area.

**Response:** 4.3. An inset has been added to Figure 5 to provide better definition of the area impacted by the restriction. The specific location of the restriction for UST 66 will be further clarified in the deed, which will include a legal description of the impacted area.

**4.4 Comment:** Currently the text refers to the area identified on Figure 5, which shows a very large area surrounding all of Building 66. The restriction should only be necessary where petroleum-affected soil remains. Additionally, to the extent that the Water Board requires a SMP, we request that the FOST clarify how the Navy plans on developing and implementing the SMP for UST 66, and how the Navy plans on coordinating with the Authority and the City and County of San Francisco regarding development and implementation of the SMP.

**Response:** 4.4. The area of restriction surrounding UST 66 is based on the distance between wells that did not contain detectable concentrations of total petroleum hydrocarbons (TPH) and the unknown areas (for example, under the building). The restriction prohibits soil disturbance without a Water Board-approved SMP, but it does not require the development of an SMP. The Navy has no plans to develop an SMP and any such plan, if developed, would be the responsibility of the Grantee.

**4.5 Comment:** The in-text table in Section 8.3 identifies notifications and restrictions separately for “Residual Petroleum Contamination at UST 66” and “Completed Petroleum Corrective Actions.” Because UST 66 is the only completed petroleum corrective action requiring a notification and restriction removed from the table.

**Response:** 4.5. As suggested, the line for “completed petroleum actions” has been removed from Table 8-3 because “residual petroleum contamination at UST 66” is the only completed petroleum action.

**4.6 Comment:** Section 6.1.2 discusses how UST 66 has been closed by the Water Board, yet will require a notice and restriction. The text then states, “The remaining UST sites do not require notices and restrictions because they have been closed by the Water Board.” Please clarify why closed UST 66 must be handled differently than the remaining close[d] UST sites.

**Response:** 4.6. See response to DTSC Specific Comment 3.

5. **Comment:** *Groundwater Use Restriction.* Section 8.2.7 describes a groundwater use restriction, however, the last sentence of Section 6.2.3 states “No restrictions are needed for groundwater within the YBI transfer parcel.” Section 8.1.4, which discusses notices pertaining to UST Site 66 similarly states, “No notifications or restrictions are required for groundwater.” We request that Section 8.2.7 be removed and the reference to groundwater use restrictions be removed from the in-text table in Section 8.3.

**Response:** The second paragraph of Section 6.2.3 has been revised as follows to agree with the restriction in Section 8.2.8:

“Groundwater recharge at YBI occurs primarily from infiltration of precipitation, with some contribution from landscape irrigation. Perched groundwater conditions may exist locally as a result of the presence of relatively impermeable silt and clay lenses. Groundwater within the areas of investigation under the facilitywide groundwater monitoring program has been identified as brackish and, because of the small volume of fresh groundwater available, potentially prone to saltwater intrusion (Water Board 1996; PRC 1997a). With regard to the groundwater investigations under the facilitywide groundwater monitoring program, the principal beneficial uses of interest are groundwater replenishment of surface water bodies (San Francisco Bay) and related protection and use of estuarine habitats. There are no restrictions on groundwater, except for the previous restriction at Site YF3 as discussed in Section 6.1.3.”

The text of Section 8.2.8 has been revised as well as follows:

“The deed will contain a covenant prohibiting the Grantee from installing groundwater production wells in the Inactive Fuel Line Site YF3 for use without the written approval of DTSC and the Water.”

6. **Comment:** *Asbestos Restriction.* Section 8.2.8 states that the deed will contain a restriction prohibiting occupancy and use of buildings and structures (or portions thereof) containing known asbestos hazards before abatement of such hazards. However, Section 6.1.1 indicates that no friable accessible and damaged (FAD) asbestos was observed during the 2004 visual inspection. Section 8.2.8 should clarify that there are no currently known asbestos hazards and the restriction applies to hazards that be identified in the future.

**Response:** The restriction in Section 8.2.9 has been revised to clarify that asbestos hazards identified in the future must be abated prior to occupancy of a building as follows:

“The deed will require the transferee to comply with the specific restrictions listed below:

- The transferee shall manage ACM in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM.
- A restriction is applicable for buildings containing non-FAD ACM within the YBI transfer parcel where asbestos was identified: Buildings 60, 61, 107, 118, 142, 162T, 168T, 205, 221, 225, 227, 243, 253, 255, 261, and Quarters 1.
- A restriction is applicable to the following buildings within the YBI transfer parcel where FAD ACM was identified and patched or repaired: Buildings 57, 62, 83, 200, 229, 230, 240, 267, 276, 300, 301, 302, 303, 304, 324, 325, 326, 327, 328, 329, and 331, and Quarters 2, 4, 5, 6, 7, and 10.
- If ACM is discovered during use, occupancy, renovation, or demolition, the transferee will be responsible for management and removal of ACM in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM.”

**7. Comment:** *Polychlorinated Biphenyl (PCB) Restrictions.* We have four comments pertaining to the PCB restrictions.

**7.1 Comment** The text in Section 8.2.9 states that all access will be restricted at the two locations described (Buildings 118 and 200), except to “qualified personnel with proper protective equipment.” It does not appear that such a restriction is necessary because the maximum PCB concentrations (up to 1.5 milligrams per kilogram [mg/kg] are well below the Toxic Substances Control Act (TSC) low-occupancy criterion of 25 mg/kg. Because the maximum concentrations exceed the high-occupancy criterion of 1 mg/kg, it appears that it is only necessary to restrict use to low-occupancy uses. This is consistent with the text in Section 6.1.5, which states “The sites require a land use restriction to limit use to low occupancy within the meaning of TSCA.”

**Response:** Comment noted, the text has been revised to restrict access to electrical transformer vault Buildings 118 and 200 to low occupancy uses.

**7.2 Comment:** The two areas requiring the restriction are not clear (Section 8.2.9). The text states that “areas” requiring a restriction are identified in the in-text table, however, the table only provides the building numbers. Will the restriction apply to the entire building (both buildings are identified as a “Transform House” in Table 4)? Please clarify.

**Response:** Text has been added to the table in [Section 8.2.10](#) to clarify the area restricted to low occupancy is the vault room as follows:

EBS Parcel	FOST Parcel	Equipment ID Number	Building	Building Occupancy Status	Maximum Concentration	Restriction
YB015	YBI Transfer Parcel	6585265	Building 118 Vault Room	Unoccupied	1.1 mg/kg 1.5 mg/kg	Low Occupancy uses only
YB019	YBI Transfer Parcel	TX-252	Building 200 Vault Room	Unoccupied	1.2 mg/kg	Low Occupancy uses only

Notes:  
mg/kg Milligrams per kilogram

**7.3 Comment:** The last sentence of Section 6.1.5 states “Should the Navy determine that additional remediation activities are appropriate these may be performed before or after transfer.” At this stage, we believe there should be no ambiguity about whether remedial activities are appropriate. If additional remediation is necessary, we request that it be conducted by the Navy before transfer.

**Response:** The last sentence of Section 6.1.5 has been revised as follows:  
“If the Navy determines that additional remedial activities are appropriate, these activities will be performed before transfer.”

**7.4 Comment:** If a deed restriction is in use by the Navy to prevent high occupancy uses, the DTSC will likely require a Land Use Covenant Implementation and Enforcement Plan that identifies responsible parties for administering and enforcing any land use covenants. In addition, this will likely require an agreed-upon mechanism to ensure that all costs associated with the implementation and enforcement be accounted for prior to recording the covenant. Given this approach, it may be more efficient and cost effective for the Navy to remediate PCB contamination at these two sites such that land use covenants can be avoided.

**Response:** Comment noted.

### Specific Comments

**1. Comment:** *Section 1.1, Introduction, last paragraph.* This paragraph indicates that a release of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substances did occur within the Yerba Buena Island (YBI) transfer parcel, however no response action was required, other than a land use restriction. It is unclear what release the text is referring to. Please describe the hazardous substances that were released, the location(s) of the release(s), and refer the reader to the appropriate section of the document where the land use restrictions are discussed.

**Response:** See the response to DTSC Specific Comment 1.

2. **Comment:** ***Sections 6.1.1 and 8.1.2, ACM. These sections should acknowledge that ACM is present in pipe-wrap of steam pipes.***

**Response:** The sixth paragraph in [Section 6.1.1](#) has been revised as follows:

“[Table 2](#) provides available information collected from surveys on the existence, extent, and condition of ACM at buildings, structures, or facilities within the YBI transfer parcel. Pipe wrap of steam pipes located in buildings and in utility trenches may also contain ACM, although selective sampling in 1995 failed to locate any ACM associated with steam pipes at YBI (Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment Vallejo [SSPORTS] 1998b). The information presented in [Table 2](#) identifies if asbestos is present in the building and if it was identified as friable. The documents reviewed were either survey reports that identify the presence of asbestos or reported abatement activities undertaken at buildings where friable asbestos was identified. The SEBS provides a more comprehensive discussion of ACM in buildings within the YBI transfer parcel ([SulTech 2005](#)).”

The second paragraph of [Section 8.1.2](#) has been revised as follows:

“The deed will contain a notice that the Grantee is hereby informed and does acknowledge that hazardous materials in the form of asbestos or ACM were found and are otherwise presumed to exist in buildings and structures (including steam pipe wrap in buildings and utility corridors) within the YBI transfer parcel. The SEBS and this FOST disclose the presence of known asbestos or ACM in buildings within the YBI transfer parcel ([SulTech 2005](#)).”

3. **Comment:** ***Section 6.2, Environmental Factors that Warrant No Constraints. The visual inspections documented in the July 8, 2005 SEBS indicate two locations where stains were observed inside buildings located on FOST parcels. The FOST should include a statement that these de minimus conditions warrant no constraints.***

**Response:** The text in [Section 6.2](#) has been revised to include a notation regarding de minimus conditions as follows:

“This section discusses sites within the YBI transfer parcel with environmental factors that do not pose a threat to human health or the environment and, as a result, do not require deed restrictions or notifications. For example, stains inside buildings observed during the 2005 SEBS are considered de minimus conditions that warrant no constraints.”

4. **Comment:** *Section 6.2.8, Adjacent Properties.* Please clarify that Site 29 will be transferred to Caltrans.

**Response:** The transfer of Site 29 to the California Department of Transportation (Caltrans) occurred in 2000. The fifth paragraph of [Section 6.2.8](#) has been clarified as requested to read as follows:

“Sites 28 and 29 consist of the west and east side on- and off-ramps of the San Francisco Bay Bridge (see [Figure 3](#)). The on- and off-ramps on YBI have been used since the Bay Bridge was constructed in 1936. The Navy is responsible for maintaining the on- and off-ramps, and Caltrans is responsible for maintaining the Bay Bridge. Most areas identified as Sites 28 and 29, except for the on- and off-ramps, are unpaved and are covered by grass or brush. Surface soils have been contaminated with lead and other metals as a result of vehicle emissions and ramp and bridge painting and maintenance. Soil beneath and surrounding the on- and off-ramps was investigated, and metals were detected at concentrations that exceeded background levels. Based on the approximate distance of the YBI transfer parcel from the Bay Bridge (150 to 200 feet), it is unlikely that lead paint and vehicle emissions will affect the parcel. Most of Site 29 was transferred by the FHWA to Caltrans by a quit claim deed dated October 25, 2000.”

5. **Comment:** *Section 6.2.5, Installation Restoration Program (IRP).* This section discusses two IRP sites (Sites 18 and 23) within the YBI FOST property and documents the fact that no further action was recommended in the 1988 Preliminary Assessment/Site Inspection. The text should also acknowledge that these two sites were recently re-considered by the BCT when datagaps were being identified and the BCT agreed that no further action was necessary.

**Response:** A final paragraph has been added to [Section 6.2.5](#) to clarify the issue as follows:

“Although both Sites 18 and 23 are recommended for no further action in the 1988 preliminary assessment/site inspection report, both sites were re-considered by the BCT when EBS data gaps were being identified, and the BCT agreed again that no further action was necessary at these sites.”

6. **Comment:** *Covenants.* Many sections of the text in [Section 8.2](#) (Covenants, Warranties, and Restrictions) indicate that “the deed will contain a covenant.” However, in many cases there is no corresponding checkmark in the “Covenant” column of the in-text table in [Section 8.3](#) (e.g., ongoing petroleum corrective actions, completed petroleum corrective actions, asbestos, PCBs). The table and text should be checked for consistency.

**Response:** The text and table have been reviewed for consistency, and the table has been revised to read as follows:

Issue	Notification	Section	Covenant	Section	Restriction	Section
Hazardous Substances	✓	8.1.1				
All Remedial Action has been Taken			✓	8.2.1		
Additional Remediation Obligation			✓	8.2.2		
Right of Access			✓	8.2.3		
Enforcement Authority			✓	8.2.4		
Asbestos Containing Material	✓	8.1.2			✓	8.2.9
Residual Petroleum Contamination: UST 66	✓	8.1.4	✓	8.2.7		
Ongoing Petroleum Corrective Action: YF3	✓	8.1.5	✓	8.2.6	✓	8.2.6
Lead-Based Paint	✓	8.1.3	✓	8.2.5	✓	8.2.5
Polychlorinated Biphenyls	✓	8.1.6			✓	8.2.10
Groundwater Use Restriction			✓	8.2.8		

7. **Comment:** *Table 2, Summary of Asbestos-Containing Material (ACM) Survey Results.* This table presents results from buildings on Treasure Island, not YBI. We request the opportunity to review information from buildings on YBI before the document is finalized. Section 8.1.2 (ACM Notices) states that information about the extent of ACM is provided in Table 2, however, the table does not appear to be structured to present such information. It would be helpful if information about extent was included in the document.

**Response:** The table presented in the revised draft version was in fact the Treasure Island FOST table, a revised [Table 2](#) with references to buildings on YBI, has been inserted in the Final YBI FOST.

8. **Comment:** *Table 3, Summary of Aboveground Storage Tanks and Underground Storage Tanks.* Under the “Comments” column heading, it is unclear what “yes” and “no” refer to. In the Treasure Island FOST, this same column heading was called “Potential for Contamination Observed.” The words “yes” and “no” appear to be intended to address the lat[t]er column heading.

**Response:** The column header has been revised to clarify “yes” and “no.” It now reads “Potential for Contamination” as in the Treasure Island FOST table.

**9. Comment:** **Table 6, Summary of Hazardous Substances Stored, Released, or Disposed of in the YBI Transfer Parcel. The title of this table is somewhat misleading because the table only documents hazardous substances that require notification under CERCLA.**

**Response:** The title of [Table 6](#) has been revised to include “CERCLA.” The table is now titled, “Table 6: Summary of CERCLA Hazardous Substances Stored, Released, or Disposed of on YBI.”

**RESPONSES TO COMMENTS FROM MS. DALE SMITH, NAVAL STATION TREASURE ISLAND RAB MEMBER**

**General Comment**

1. **Comment:** The documents are sorted by year, but not alphabetically within the year. This is an improvement over the TI FOST but still is not user friendly. Organizing the documents alphabetically by consultancy within each year would be an improvement.

**Response:** The YBI FOST has been prepared in accordance with accepted standards. The documents are presented in chronological order rather than in alphabetical order. The electronic copy of the FOST report, available on the CD submitted with both revised draft and final versions of the document, and available upon request, is fully text searchable.

2. **Comment:** Table 2 is the only place where parcel numbers and building numbers are cross referenced. Elsewhere in the document it is difficult to figure out what type of building has been impacted. Is it possible to be clearer about the buildings impacted, by identifying them?

**Response:** The FOST is intended to be a concise summary of past investigations and determinations that property is suitable for transfer. As such, it is not appropriate for all details to be included. Please refer to the SEBS for a more detailed discussion of the buildings and any impacts ([SulTech 2005](#)).

3. **Comment:** Table 3 has a comment column that cannot be readily interpreted. To what does the yes and no refer? Transferable? Remediated?

**Response:** Upon review, the yes/no in the comment field refers to the potential for contamination observed at the time of removal or discovery of the UST/aboveground storage tank (AST), and since all sites have been granted no further action status, the information is not necessary, and therefore the column has been removed for clarity.

**Specific Comments**

1. **Comment:** In the documents reviewed section, no mention is made of the review of radiologicals, although a letter is cited in 2005. Should not this report be included in the documents reviewed section?

**Response:** The letter referenced is included in [Section 1.3](#) and in the reference below.  
Navy. 2005a. Letter Regarding Results of Historical Radiological Assessment for the FOST Areas, Former NAVSTA TI. From Jim Whitcomb, Remedial Project Manager, BRAC PMO West. To NAVSTA TI BCT. March 1.

However, since preparation of the YBI FOST, the Navy has completed a draft HRA of NAVSTA TI. This document has now been included in the list of documents reviewed.

**RESPONSE TO COMMENT FROM MR. NATHAN BRENNAN, NAVAL STATION TREASURE ISLAND  
RAB MEMBER**

1. **Comment:** Cover Letter. Item 1. Comments due Tuesday September 7 (6)

**Response:** Comment noted.

2. **Comment:** Section 1.3. To echo Dale Smith's comment for the TI FOST, trying to trace something or find it in this document list would be challenging since it is a chron file.

**Response:** See the response to Dale Smith's General Comment 1.

3. **Comment:** Section 6.1.5-pgs 25 & 26. PCBs: with the last sentence in this section leaving this open to interpretation, shouldn't the restricted sites be held for the FOSET?

**Also the sites are called out differently through the document, need to be cross referenced, here they are TX-252 & 6585265... elsewhere Bldg 118 & 200...**

**Response:** The restrictions identified in the FOST provide adequate protection of human health and the environment to allow transfer of the property. The PCB sites will be further addressed under TSCA by the Navy or subsequent landowner. The fact that the Navy is addressing these PCB locations under TSCA allows the Navy to make the CERCLA warranty that all remedial activities have been completed within the meaning of the CERCLA statute.

A portion of the text of the final paragraph of [Section 6.1.5](#) has been revised to include references to both building numbers and transformer numbers as follows:

“The two PCB sites inside buildings (118 [6585265] and 200[TX-252]) are not likely to result in a release to the environment (Sullivan Consulting Group and Tetra Tech 2004). Both a notice and restriction are required because the two indoor sites identified as TX-252 (in Building 200) and 6585265 (in Building 118) have not received regulatory closure and the analytical results do not meet the TSCA criterion for high occupancy. The sites require a land use restriction to limit use to low occupancy within the meaning of TSCA or other actions consistent with TSCA. Sections 8.1.6 ~~8.1.5~~ and 8.2.10 present the notification and restriction respectively, required for the PCB sites. If the Navy determines that additional remedial activities are appropriate, these activities will be performed before transfer.”

4. **Comment:** Section 6.2.5-pg 28. Last paragraph second sentence- the “areal” distribution. Should this be area of?

**Response:** The text has been revised to read “area of” instead of “areal.”

5. **Comment:** Section 8.1.5. Again cross reference these PCB locations (noted in #3) to make it simple throughout the documents. Here it is Bldg 118 and 200.

**Response:** This comment is noted, and the first sentence of the first paragraph of [Section 8.1.6](#) (formerly Section 8.1.5) has been revised to include both building and transformer numbers as follows:

“The deed will contain a notice that PCB-containing electrical equipment exists inside the Building 118 (6585265) vault room and in the Building 200 (TX-252) vault room in the YBI transfer parcel.”

6. **Comment:** Section 8.2.9- pgs 37 & 38. Here is the cross reference for the PCBs, but for simplicity should follow through the document.

**Response:** This comment is noted, and the text has been revised as identified in previous responses to previous comments.

7. **Comment:** Figure 5. PCBs noted as Building 118 & 200.

**Response:** The labels for the PCB restrictions on Figure 5 have been revised to include the equipment identification numbers.

8. **Comment:** Table 4. The status comment for this FOST breaks better than for the TI FOST, but I think it needs to be more specific: “No action required for closure”.

**Response:** This comment is noted, and the table has been revised as suggested.

9. **Comment:** Table 5. PCBs here we have equipment numbers and EBS parcel numbers, but no building #, so... using the ECP Area Type I can found #6585265. Then there are a few ECP 3's so.. I see, use the Closure Document column to find TX252.

**Response:** Because of space constraints, we are unable to add a building number column to this table. Also, a number of transformer locations sampled are pads located outside of the buildings; therefore, they do not always have a building reference. The text in [Sections 6.1.5, 8.1.6, and 8.2.10](#) and in [Figures 3 and 5](#); however, have been revised to include both the relevant building and transformer numbers when these two transformers are discussed.

RESPONSE TO COMMENT FROM THE STATE OF CALIFORNIA, THE RESOURCE AGENCY,  
DEPARTMENT OF PARKS AND RECREATION

1. **Comment:** Thank you for the opportunity to comment on the Finding of Suitability to Transfer (FOST), for Property on Yerba Buena Island. The document appears to provide a comprehensive analysis of potential human health and environmental risks that may exist on the island.

**Response:** Comment noted.

2. **Comment:** State Parks is concerned about any potential effects related to the FOST on Eastshore State Park, which is directly east of Yerba Buena Island. State Parks has concern over development and land uses outside State Park units that have the potential to adversely affect park values. Eastshore State Park extends approximately 8.5 miles along the eastern shoreline of San Francisco bay from the Oakland Bay Bridge north to the Marina Bay neighborhood in the city of Richmond. The park includes tidelands along the waterfronts of the cities of Oakland, Emeryville, Berkeley, Albany, and Richmond.

**Response:** Comment noted.

3. **Comment:** State Parks (Parks) and the Department of the Navy (DON) share ownership of lands within San Francisco Bay. Due to the close proximity of DON and Park lands, actions implemented by any one agency may in effect have collateral effects, via bay hydrological and atmospheric processes, on the other. Due to this unique geographic relationship, State Parks is primarily concerned about any current and/or future proposed reuse actions which may have the potential to release hazardous substances to bay tidal forces, especially since the majority of Eastshore State Park consists of the nearshore zone and shoreline. The nearshore zone accounts for about 88% (2,002 acres) of the entire Eastshore State Park area.

Another link is via prevailing winds. Any future and/or proposed reuse actions that may result in the removal of hazardous substances, which have the potential to become airborne, would be of concern to State Park staff.

**Response:** Future land owners will be required to comply with all applicable federal, state, and local laws and regulations, including those that address the concerns mentioned above.

4. **Comment:** Staff assumes that once FOST related transfers have been successfully completed any subsequent reuse related development would be subject to CEQA/NEPA review.

**Response:** Future land owners will be required to comply with all applicable federal, state, and local laws and regulations.

5. **Comment:** **Section 6.2.4 “Storm Sewers”** - This section does not specifically list the sampling findings listing the levels of contaminants found in the offshore sediments, pore water, invertebrate bioassays, and tissue residue analysis. Again, State Park staff has concern over any current and/or future reuse activities which may result in the disturbance and/or introduction of contaminated offshore sediments to tidal influences. The concern here is related to disturbing and mobilizing contaminated sediments, with mobilization and eventual settling of contaminants to surrounding areas including Eastshore State Park.

**Response:** The FOST is intended to be a concise summary of past environmental investigations and determinations that property is suitable for transfer. As such, it is not appropriate for all details to be included. Please refer to the no-further-action record of decision and associated documents discussed in [Section 6.2.4](#) of the FOST for additional details regarding sampling findings.

With respect to future reuse activities, future land owners will be required to comply with all applicable federal, state, and local laws and regulations, including California Environmental Quality Act (CEQA). These laws will afford the State Parks with an opportunity to review and comment on future proposed reuse activities with the potential for significant environmental effects.

6. **Comment:** **Table 3. Summary of Aboveground Storage Tanks & Underground Tanks** - In reviewing Table 3 staff has the following comment:

**Staff assumes that for all underground storage tanks (UST) that were “closed in place” all material stored in the tanks was disposed prior to closure of the individual tank. For UST 111, has there been any assessment of the degree to which diesel fuel may have contaminated the surrounding soil? Will there be, or has there been, a remediation/cleanup plan for UST 111 related contamination?**

**Response:** The staff assumption that materials in all USTs “closed in place” were disposed of prior to closure of the individual tank is correct. At UST 111, diesel within the tank was removed, and the tank was cleaned, grouted, and left in place. Confirmation samples collected after closure of the tank did not indicate the presence of TPH, and a 1996 Water Board letter concurs with no further action at the tank ([Water Board 1996](#)). No further action is planned for UST 111.

7. **Comment:** Staff realizes the DON is quickly approaching the final stages of transfer. It is our sincere hope that the proposed reuse of the YBI transfer parcel, as set forth in the Final Environmental Impact Statement, will result in improved open space and recreation opportunities for the residents of the Bay area and California.

**Response:** Comment noted.

## REFERENCES

SulTech. 2005. "Final Supplemental EBS, NAVSTA TI, San Francisco, California." Prepared for Base Realignment and Closure Program Management Office West. July 8.

San Francisco Bay Regional Water Quality Control Board (Water Board). 1996. Letter Regarding UST Case Closure (Tanks 1B, 1C, 1D, 1F, 2A, 2D, 111, 169, 180A, 180B, 330C, 330D), Naval Station Treasure Island. From Loretta K. Barsamian, Executive Officer, Water Board. To Baha Zarah, Engineering Field Activity WEST. July 22.

Weston Solutions, Inc. 2006. "Final Treasure Island Naval Station Historical Radiological Assessment, Former Naval Station Treasure Island, San Francisco, California." February 10.