



Final

Finding of Suitability to Transfer for Property on Treasure Island

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

February 15, 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.B034.14213

Final

**Finding of Suitability to Transfer For Property on
TREASURE ISLAND
Naval Station Treasure Island
San Francisco, California**

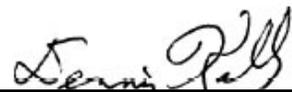
Contract Task Order 034
DS.B034.14213

PREPARED FOR:

DEPARTMENT OF THE NAVY

REVIEW AND APPROVAL

Project Manager:


Dennis Kelly, SulTech

Date: February 15, 2006

TABLE OF CONTENTS

REVIEW AND APPROVAL i

ACRONYMS AND ABBREVIATIONSv

1.0 PURPOSE.....1

 1.1 INTRODUCTION1

 1.2 ORGANIZATION OF THE FINDING OF SUITABILITY TO TRANSFER2

 1.3 DOCUMENTS REVIEWED AND REFERENCED3

2.0 PROPERTY DESCRIPTION19

3.0 REGULATORY COORDINATION20

4.0 NATIONAL ENVIRONMENTAL POLICY ACT CONSIDERATIONS21

5.0 ENVIRONMENTAL-CONDITION-OF-PROPERTY AREA TYPE21

6.0 ENVIRONMENTAL FACTORS22

 6.1 ENVIRONMENTAL FACTORS THAT WARRANT CONSTRAINTS AND/OR
 REQUIRE NOTIFICATION.....22

 6.1.1 Asbestos-Containing Material22

 6.1.2 Petroleum Program23

 6.1.3 Lead-Based Paint25

 6.1.4 Groundwater26

 6.1.5 Polychlorinated Biphenyls26

 6.2 ENVIRONMENTAL FACTORS THAT WARRANT NO CONSTRAINTS.....27

 6.2.1 Radon28

 6.2.2 Radiological Contaminants.....28

 6.2.3 Storm Sewers28

 6.2.4 Installation Restoration Program29

 6.2.5 Aboveground Storage Tanks.....29

 6.2.6 Petroleum Program30

 6.2.7 Other Locations of Concern.....31

 6.2.8 Adjacent Properties.....32

7.0 PROPOSED REUSE37

TABLE OF CONTENTS (Continued)

8.0	CONVEYANCE CONDITIONS AND NOTIFICATIONS	37
8.1	NOTICES.....	38
8.1.1	Notice of Hazardous Substances.....	38
8.1.2	Asbestos-Containing Material	38
8.1.3	Lead-Based Paint	39
8.1.4	Drinking Water	40
8.1.5	Residual Petroleum Contamination	40
8.1.6	Polychlorinated Biphenyls.....	40
8.2	COVENANTS, WARRANTIES, AND RESTRICTIONS	40
8.2.1	All Remedial Action Has Been Taken.....	40
8.2.2	Additional Remediation Obligation.....	41
8.2.3	Right of Access	41
8.2.4	Lead-Based Paint	41
8.2.5	Petroleum Restrictions	41
8.2.6	Groundwater Use Restriction.....	42
8.2.7	Asbestos Restriction.....	42
8.2.8	Polychlorinated Biphenyl Restriction.....	43
8.3	SUMMARY OF NOTIFICATIONS AND RESTRICTIONS	44
9.0	FINDING OF SUITABILITY TO TRANSFER	45

FIGURES

- 1 Regional Location Map
- 2 Environmental Condition of Property Area Type Classification Map
- 3 Investigation Sites Within and Adjacent to the FOST Areas
- 4 Locations of Monitoring and Remediation Wells
- 5 Planned Reuse Areas
- 6 Areas Subject to Notices or Restrictions

TABLES

- 1 Summary of ECP Area Types for EBS Parcels in FOST Areas
- 2 Summary of Asbestos-Containing Material Survey Results
- 3 Summary of Underground Storage Tanks, Oil/Water Separators, and Aboveground Storage Tanks
- 4 Lead-Based Paint Information for Nonresidential Buildings Constructed Before 1978 within the FOST Area
- 5 Inventory of Equipment with Dielectric Fluid That May Contain PCBs
- 6 Summary of Hazardous Substances Stored, Released, or Disposed of

APPENDIX

- A Response to Comments

ACRONYMS AND ABBREVIATIONS

$\mu\text{g}/\text{cm}^2$	Microgram per square centimeter
ACM	Asbestos-containing material
AST	Aboveground storage tank
ATG	Allied Technology Group, Inc.
BCT	Base Realignment and Closure Cleanup Team
bgs	Below ground surface
BRAC	Base Realignment and Closure
BRAC PMO West	Base Realignment and Closure Program Management Office West
Cal EPA	California Environmental Protection Agency
CAP	Corrective action plan
CCR	California Code of Regulations
CCSF	City and County of San Francisco
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
DoD	U.S. Department of Defense
DTSC	California Department of Toxic Substances Control
EBS	Environmental baseline survey
ECP	Environmental-condition-of-property
EFA WEST	Naval Facilities Engineering Command, Engineering Field Activity West
EIS	Environmental impact statement
EPA	U.S. Environmental Protection Agency
ERA	Ecological risk assessment
ERM-West	ERM-West, Inc.
FAD	Friable, accessible, and damaged
FFSRA	Federal Facility Site Remediation Agreement
FOST	Finding of suitability to transfer
FS	Feasibility study
Gaia	Gaia Consulting, Inc.
Geomatrix	Geomatrix Consultants Inc.
IR	Installation Restoration
IRP	Installation Restoration Program
LBP	Lead-based paint
mg/kg	Milligram per kilogram
MINS	Mare Island Naval 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
OWS	Oil-water separator
PAH	Polycyclic aromatic hydrocarbon
PCB	Polychlorinated biphenyl
pCi/L	Picocurie per liter of air
PMO	Program Management Office
ppm	Part per million
PRC	PRC Environmental Management, Inc.
PUC	San Francisco Public Utilities Commission
PWC	Navy Public Works Center
Radian	Radian International LLC
RASO	Radiological Affairs Support Office
RCRA	Resource Conservation and Recovery Act
RI	Remedial investigation
RPM	Remedial project manager
Shaw	Shaw Environmental & Infrastructure, Inc.
SPCC	Spill prevention control and countermeasures
SSPORTS	Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment, Vallejo
SULLIVAN	Sullivan Consulting Group
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
TPH	Total petroleum hydrocarbon
TSCA	Toxic Substances Control Act
U&A	Uribe and Associates
USC	<i>United States Code</i>
USFWS	U.S. Fish and Wildlife Service
UST	Underground storage tank

ACRONYMS AND ABBREVIATIONS (Continued)

VOC	Volatile organic compound
Water Board	San Francisco Bay Regional Water Quality Control Board
WESTDIV	Naval Facilities Engineering Command, Western Division
YBI	Yerba Buena Island

1.0 PURPOSE

The purpose of this finding of suitability to transfer (FOST) is to document 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 that is protective of human health and the environment. This FOST has been prepared in compliance with U.S. Department of Defense (DoD) guidance for the environmental review process to reach a FOST ([DoD 1994a](#)).

This document 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 [SULLIVAN] and Tetra Tech EM Inc. [Tetra Tech]) provides technical support to the U.S. Department of the Navy, Base Realignment and Closure (BRAC) Program Management Office (PMO) West (BRAC PMO West) for the former NAVSTA TI in San Francisco, California.

1.1 INTRODUCTION

NAVSTA TI was included on the 1993 BRAC III list for closure, and was operationally closed in 1997. NAVSTA TI is located in the San Francisco Bay ([Figure 1](#)), at mid-span of the San Francisco-Oakland Bay Bridge. NAVSTA TI property to be disposed of consists of 366 acres of dry land on Treasure Island (TI), an artificial island; and approximately 547 acres of surrounding submerged lands. This FOST covers approximately 169.76 acres of dry land on TI, identified as transfer parcels on [Figure 2](#). The FOST transfer parcels are referred to hereinafter as “FOST areas.”

Petroleum contamination in groundwater and soil and polychlorinated biphenyl (PCB) releases from electrical transformers are the only ongoing environmental issues within the FOST areas. Under CERCLA, the federal government must warrant all remedial action necessary to protect human health and the environment have been completed with respect to CERCLA hazardous substances prior to transfer of properties by deed. The definition of CERCLA hazardous substances does not include petroleum products or derivatives, and as a result, the 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 spill sites within the FOST parcels will be addressed pursuant to Toxic Substances Control Act (TSCA). To expedite property transfer and redevelopment activities, the FOST areas will be transferred before the corrective actions for petroleum and PCB contamination and regulatory closures are completed. This FOST addresses potential human health and environmental risks that may exist from exposure to petroleum contamination and PCBs at the FOST areas (1) under current conditions and (2) while the PCB and petroleum corrective action is ongoing.

A release of hazardous substances did occur within the FOST areas. CERCLA hazardous substances were detected at levels that did not require a response action. Conveyance conditions and notifications necessary to prevent risk to human health or the environment are presented in [Section 8.0](#).

1.2 ORGANIZATION OF THE FINDING OF SUITABILITY TO TRANSFER

The FOST report is organized into the following sections:

- [Section 1.0](#), Purpose: Discusses the purpose of the FOST, the organization of the FOST report and the sources of information analyzed.
- [Section 2.0](#), Property Description: Discusses the geographic extent of the FOST areas.
- [Section 3.0](#), Regulatory Coordination: Discusses the regulatory history of the FOST areas.
- [Section 4.0](#), National Environmental Policy Act Considerations: Discusses the disposal and reuse of the FOST areas with regard to requirements of the National Environmental Policy Act (NEPA) of 1969.
- [Section 5.0](#), Environmental-Condition-of-Property Area Type: Classifies the FOST areas into environmental-condition-of-property (ECP) area types.
- [Section 6.0](#), Environmental Factors: Discusses 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 FOST areas that was identified by the Navy in the “Final Environmental Impact Statement” ([Navy 2003m](#)) and reviewed during the preparation of this FOST.
- [Section 8.0](#), Conveyance Conditions and Notifications: Describes the notices and restrictions for transfer of FOST areas.
- [Section 9.0](#), Finding of Suitability to Transfer: Presents the signed statement that the identified FOST areas are 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 AND REFERENCED

This FOST is based on a comprehensive review of information contained in the following documents, presented in chronological order:

1960's

- California Division of Mines and Geology. 1969. "Treasure Island Fill. Geological and Engineering Aspects of San Francisco Bay Fill." Case History 2. Prepared by C.H. Lee of the California Division of Mines and Geology. Special Report 98.

1986

- U.S. Department of the Navy, Naval Facilities Engineering Command, Western Division (WESTDIV). 1986. "Natural Resources Management Plan, Treasure Island Naval Station, San Francisco, California." July.

1987

- ERM-West, Inc. (ERM-West). 1987. "Final Report, Tank Testing Study." July.

1988

- Dames and Moore. 1988. "Final Preliminary Assessment/Site Inspection of Naval Station Treasure Island (NAVSTA TI)." Naval Energy and Environmental Support Activity. April.

1990

- PRC Environmental Management, Inc. (PRC). 1990a. "Draft Tank Removal Summary Report, NAVSTA TI." August 31.
- Geomatrix Consultants Inc. (Geomatrix). 1990b. "Results of Field Exploration and Laboratory Testing Program for Perimeter Dike Stability Evaluation, Volume 2." August 31.
- WESTDIV. 1990c. "San Francisco Base Closure and Realignment Pre-Final Environmental Impact Statement." October.
- Geomatrix. 1990d. "Compilation of Data and Information for Evaluation of Interior Area Performance, NAVSTA TI, San Francisco, California, Volume 4." October 12.
- Geomatrix. 1990e. "Evaluation of Interior Area Performance, Volume 5." October 25.
- Geomatrix. 1990f. "Perimeter Dike Stability Evaluation, Volume 3." October 25.

1991

- Navy. 1991a. “Environmental Compliance and Protection Manual.”
- Navy. 1991b. “Hazardous Waste Management Contingency Plan.” January.
- National Oceanic and Atmospheric Administration (NOAA). 1991c. “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). 1992a. “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). 1992b. “Solid Waste Management Program for NAVSTA TI, Draft.” WESTDIV. January 24.
- PRC. 1992c. “Final Summary Report for the Suitability Study of Floating Product Removal.” February 10.
- Radian. 1992d. “Hazardous Waste Management Plan for NAVSTA TI, Draft.” WESTDIV. July 1.
- California Department of Toxic Substances Control (DTSC). 1992e. “Federal Facility Site Remediation Agreement for NAVSTA TI.” September 29.
- California Department of Fish and Game. 1992f. “Fish, Shrimp and Crab Catch Data Collected in Delta Outflow, San Francisco Study.” Prepared by K. Hieb, Bay Delta Special Water Projects Division, California Department of Fish and Game. December.

1993

- PRC. 1993a. “Draft Phase I Remedial Investigation (RI) Report, NAVSTA TI.” Department of the Navy, WESTDIV, November 1.
- PRC. 1993b. “Treasure Island Draft Ecological Risk Assessment (ERA).” November 15.
- USFWS. 1993c. “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

- U.S. Department of Defense (DoD). 1994a. “DoD Guidance on the Environmental Review Process to Reach a Finding of Suitability to Transfer (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 Base Realignment and Closure Cleanup (BRAC) Properties.”
- PRC. 1994e. “Draft Summary Report of Underground Storage Tank (UST) Removals, NAVSTA TI.” January.
- Navy Public Works Center (PWC). 1994f. “List of Oil-Filled Electrical Equipment for Yerba Buena Island.” July 1.
- Navy. 1994g. “Environmental and Natural Resources Program Manual.” November 1.
- PRC. 1994h. “Final Site 1- Medical Clinic Additional Characterization Field Work Plan Addendum.” December 9.

1995

- Navy. 1995a. “Naval Facilities Engineering Command Environmental Baseline Survey (EBS) Guidance.”
- Navy. 1995b. Letter Regarding Radiological Affairs Support Office (RASO) Clearance of Radiological Issues of Concern For NAVSTA TI. From Lt. Commander Heron of Naval Facilities Engineering Command, Engineering Field Activity West (EFA WEST). To Mr. David Wang of DTSC, RASO. March 8.
- PWC. 1995c. “PWCFB 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.
- Base Realignment and Closure Cleanup Team (BCT). 1995d. “NAVSTA TI Remedial Project Managers (RPM) and BCT Meeting Minutes.” May 1.
- ERM-West. 1995e. “Basewide EBS Report for NAVSTA TI.” May 19.
- BCT. 1995f. “NAVSTA TI RPM and BCT Meeting Minutes.” May 26.
- U.S. Environmental Protection Agency (EPA). 1995g. “Aerial Photographic Analysis of NAVSTA TI.” June 5.
- PRC. 1995h. “Installation Restoration Long-Term Plan, Revision 02.” June 13.
- Subsurface Consultants, Inc. 1995i. “Geotechnical Investigation Closure of Inactive Fuel Pipelines NAVSTA TI.” June 20.
- ERM-West. 1995j. “Parcel-Specific EBS for Parcels T005 and T006 at NAVSTA TI.” August 3.

- Mare Island Naval Shipyard (MINS). 1995k. “Final Asbestos Survey Report, NAVSTA TI.” December.

1996

- DoD. 1996a. “Fast Track Cleanup at Closing Installations.”
- MINS. 1996b. “Historical Study of Yerba Buena Island (YBI), Treasure Island (TI) and Their Buildings.” March.
- PRC. 1996c. “Phase II ERA Final Work Plan and Field Sampling Plan, NAVSTA TI.” April 1.
- Radian. 1996d. “Oil and Hazardous Substance Spill Prevention Control and Countermeasure (SPCC) Plan, Final.” April 18.
- ERM-West. 1996e. “Final EBS Sampling Work Plan for NAVSTA TI.” April 30.
- PWC. 1996f. “Lead Management Plan, NAVSTA TI.” May.
- PWC. 1996g. “Asbestos Management Plan, FY-1966 (1100’s) Housing, Naval Support Activity Treasure Island, San Francisco, California.” May 1.
- Ecology and Environment, Inc. 1996h. “Storm Drain Cleaning Project Phase I and II, 1995-1996, NAVSTA TI, PWCs San Francisco, Final Summary Report.” June 1.
- ERM-West. 1996i. “Site-Specific EBS - Parcels T007, T008, T010, T014 and T116 at NAVSTA TI.” June 21.
- City and County of San Francisco (CCSF). 1996j. “A NAVSTA TI Reuse Plan Public Review Draft.” Prepared by the Office of Military Base Conversion, Planning Department, CCSF, and the San Francisco Redevelopment Agency. July.
- PRC and Gaia Consulting, Inc (Gaia). 1996k. “Site-Specific EBS for Parcels T077, T078, T079, and T080 Including Buildings 570, 572, 670, and 671 to Support the Lease of the Brig at NAVSTA, California.” July.
- San Francisco Bay Regional Water Quality Control Board (Water Board). 1996l. 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.
- DoD. 1996m. *BRAC Cleanup Plan Guidebook*. Fall 1996.
- PRC. 1996n. “Draft RI Report, NAVSTA TI.” October 1.
- PRC and Gaia. 1996o. “Site-Specific EBS for Parcels T081, T082, T083, T109, T110, and T111 to Support the Lease of the Proposed Police Training Academy at NAVSTA TI, California.” December 18.

1997

- DoD. 1997a. “Responsibility for Additional Environmental Cleanup After Transfer of Real Property.”
- U.S. Department of Housing and Urban Development. 1997b. “Guidelines for the Evaluation and Control of Lead-Based Paint (LBP) Hazards in Housing.”
- PWC. 1997c. “UST Removal Summary Report for Tank 85, NAVSTA TI.” March.
- PWC. 1997d. “UST Removal Summary Report for Tanks 248-A, 248-B, 257, Quarters 8, 180-D and 180-E, Treasure Island.” March.
- JRP Historical Consulting Services. 1997e. “Cultural Resource Inventory and Evaluation Investigations: Yerba Buena Island and Treasure Island, NAVSTA TI.” March.
- PWC. 1997f. “List of Oil Filled Electrical Equipment for NAVSTA TI.” March 6.
- Radian. 1997g. “Asbestos Survey Summary of 141 Buildings for NAVSTA TI.” May.
- Tetra Tech Inc. 1997h. “Final Report, Locate Abandoned Fuel Lines.” May.
- PRC. 1997i. “EBS Screening Level Data Report, Treasure Island.” May 30.
- Radian. 1997j. “Asbestos Survey Summary of 71 Buildings for NAVSTA TI.” June 1.
- DTSC. 1997k. Letter Regarding Analysis of Comprehensive Environmental Response, Compensation, and Liability Act (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, San Francisco Bay Water Board. June 20.
- Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment Vallejo (SSPORTS). 1997l. List of transformers and oil-filled switches sighted at Treasure Island.
- PRC and Uribe and Associates (U&A). 1997m. “Final Site-Specific EBS for Reuse Zone 1, NAVSTA TI, San Francisco, California.” July 17.
- PRC and U&A. 1997n. “Final Site-Specific EBS for Reuse Zone 2, NAVSTA TI, San Francisco, California.” August 12.
- PRC. 1997o. “Draft Final Onshore RI Report, NAVSTA TI, San Francisco, California.” Prepared for EFA WEST. September.

- Tetra Tech EM Inc. (Tetra Tech) and U&A. 1997p. “Final Site-Specific EBS for Reuse Zone 3, NAVSTA TI, San Francisco, California.” September.
- Water Board. 1997q. Letter Regarding UST Case Closure (Tanks 8 [Qtr 8, QR08], 230, 257, 180D, 180E) NAVSTA TI, San Francisco, CA. From Richard McMurtry, Groundwater Protection and Waste Containment Division Chief, Water Board. To John Pfister, Navy, EFA WEST. October 3.

1998

- Tetra Tech. 1998a. “Site 24 Additional Characterization Summary Report, NAVSTA TI, San Francisco, California” January 7.
- Allied Technology Group, Inc. (ATG). 1998b. “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.
- Tetra Tech. 1998c. “BRAC Cleanup Plan, NAVSTA TI, San Francisco, California.” Revision 04. March 1.
- ATG. 1998d. “NAVSTA TI Asbestos Remediation for Phase II Abatement for 38 Facility Buildings. June.
- EFA WEST. 1997-1998e. “Quarterly Visual Observations (Unauthorized Non-Storm Water Discharges), Storm Water Annual Report.” June 30.
- Tetra Tech and U&A. 1998f. “Final Site-Specific EBS for Reuse Zone 6, NAVSTA TI, San Francisco, California.” July.
- Tetra Tech and U&A. 1998g. “Draft Phase Ia Transfer Area Supplemental EBS for NAVSTA TI.” August 12.
- Tetra Tech and U&A. 1998h. “Draft Phase Ib Site-Specific EBS for NAVSTA TI.” September 16.
- ATG. 1998i. “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 Quarter 62 at TI.” October.
- ERM-West. 1998j. “UST Investigation Report and Corrective Measures Study, Former UST Sites 1A, 1E, 180C, 201, 227, 368A, and 368B – Final, Revised.” October.
- Tetra Tech and U&A. 1998k. “Responses to Comments on the Draft Phase Ia Transfer Area Supplemental EBS, NAVSTA TI, San Francisco, California.” October 26.
- Navy. 1998l. “Responses to Comments on the Draft Phase Ia Transfer Area Supplemental EBS, NAVSTA TI, San Francisco, California.” October 26.

- Radian. 1998m. “Addendum to the Storm Water Pollution Prevention Plan.” October 29.
- ERM-West. 1998n. “Report on Site Investigation, Former Tank 225A.” November.
- Tetra Tech and U&A. 1998o. “Final Site-Specific EBS Reuse Zone 4, NAVSTA TI, San Francisco, California.” November.
- SSPTS. 1998p. “Asbestos Building Survey Report for Miscellaneous Facility Buildings and Underground Steam Utility Lines.” November.
- BCT. 1998q. “Meeting Minutes, RI and Feasibility Study (FS), Remedial Project Managers (RPM) and BCT, November 2, 1998.” November.
- AGS, Inc. 1998r. “Draft Final RI Report for USTs 29 and 143 at NAVSTA TI.” December.
- SSPTS. 1998s. “Work Plan, Remove Hydraulic Lifts, Polychlorinated Biphenyls (PCB), Decontaminate and Backfill Pits in Buildings 41, 180, 225, 330, and 448.” December.

1999

- Tetra Tech and U&A. 1999a. “EBS Sampling and Analysis Summary Report, NAVSTA TI, San Francisco, California.” January 8.
- Tetra Tech and U&A. 1999b. “Final Site-Specific EBS Reuse Zone 5, NAVSTA TI, San Francisco, California.” March.
- Tetra Tech. 1999c. “Additional Characterization of Total Petroleum Hydrocarbons, Site 12 – Old Bunker Area, Soil and Groundwater Sampling Results, Final Technical Memorandum.” April 19.
- IT Corporation. 1999d. “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. 1999e. “Draft Phase IIa Transfer Area Supplemental EBS, NAVSTA TI, San Francisco, California.” June 9.
- ERM-West. 1999f. “Final UST Investigation Report for UST 270.” August.
- SSPTS. 1999g. “Asbestos Remediation Report for Residential Housing Units at TI and YBI.” August.
- SSPTS. 1999h. “Asbestos Remediation Completion Report for Nonresidential Miscellaneous Facility Buildings.” August.
- SSPTS. 1999i. “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.

- DoD and EPA. 1999j. “Interim Final Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property – A Field Guide.” December 1.
- EFA West. 1998-1999k. “Quarterly Visual Observations (Unauthorized Non-Storm Water Discharges), Storm Water Annual Report.”

2000

- DoD. 2000a. “LBP Policy for Disposal of Residential Real Property.” January.
- Roy F. Weston. 2000b. “Environmental Report: Building 330 Cleanup.” March 9.
- Roy F. Weston. 2000c. “Environmental Report: Building 530 Cleanup.” March 9.
- DTSC. 2000d. “Memorandum of Agreement between the US Department of the Navy and the California Department of Toxic Substances Control.” March 10.
- AGS, Inc. 2000d. “UST Closure Report, Building 469.” May.
- Treasure Island Development Authority (TIDA). 2000e. “Final Report Economic Development Conveyance Application and Business Plan for NAVSTA TI.” June 19.
- CCSF. 2000f. Letter Regarding Notice of Completion UST Removal (Tank 469). From Sue Cone, Program Manager, Hazardous Materials Unified Program Agency and Jim Tang, Environmental Health Inspector, UST Closure Program. To Naval Facilities Engineering Command. July 7.
- EFA West. 1999-2000g. “Quarterly Visual Observations (Unauthorized Non-Storm Water Discharges), Storm Water Annual Report.”

2001

- AGS, Inc. 2001a. “UST Closure Report for UST Sites 1A, 1E, and 368A, Draft Final.” January.
- AGS, Inc. 2001b. “UST Investigation Report for UST Sites 143, 180C, 201, 227, and 368B, Draft Final.” January.
- Water Board. 2001c. 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 T. Scott, Groundwater Protection and Waste Containment Division, Water Board. To Ann Klimek, Environmental Business Line Team Leader, Naval Facilities Engineering Command, Southwest Division (SWDIV). January 23.
- AGS, Inc. 2001d. “UST Records Research Report.” April.
- Tetra Tech. 2001e. “Final Action Memorandum, Site 1.” June 12.

- U.S. Federal Highway Administration. 2001f. “Department of Transportation, Federal Highway Administration, Record of Decision, San Francisco-Oakland Bay Bridge East Span Seismic Safety Project.” July 11.
- Tetra Tech. 2001g. “Groundwater Status Report: Summary of Groundwater Monitoring April through October 2000.” August.
- Tetra Tech. 2001h. “Supplemental Site Installation Restoration (IR) Site 01, Former Medical Clinic, Final.” October 24.
- Tetra Tech. 2001i. “Fuel Lines and Utilities Map, NAVSTA TI, San Francisco, California.” November.
- Tetra Tech. 2001j. “Final RI Offshore Sediments Operable Unit, Volumes I and II, NAVSTA TI.” December 28.

2002

- Tetra Tech. 2002a. “Technical Memorandum, Field Work Results – July through September 2001, Additional Investigation – Vessel Waste Oil Recovery Area, Installation Restoration Site 21, NAVSTA TI, San Francisco, California.” January.
- BCT. 2002b. “NAVSTA TI RPM and BCT Meeting Minutes.” January 8.
- BCT. 2002c. “NAVSTA TI RPM and BCT Meeting Minutes.” February 5.
- Water Board. 2002d. Letter Regarding Case Closure Letter for DoD USTs at NAVSTA TI, including 1A, 1E, 368A, and 2C. From Curtis T. Scott, Division Chief, Groundwater Protection and Waste Containment Division. To Ellen Casados, SWDIV. February 25.
- DTSC. 2002e. Letter Regarding Approval of No Further Action (NFA) for Site 1 (Former Medical Clinic in Building 257), NAVSTA TI, San Francisco, California. From Anthony J. Landis, P.E., Chief, Northern California Operations, Office of Military Facilities. To Mr. Scott D. Anderson, RPM, BRAC PMO West. March 20.
- DTSC. 2002f. Letter Regarding Approval of NFA for Site 03 (Former Polychlorinated Biphenyl Storage Area), NAVSTA TI, San Francisco, California. From Anthony J. Landis, P.E., Chief, Northern California Operations, Office of Military Facilities, to Ms. Ellen Casados, RPM, BRAC PMO West. March 20.
- Tetra Tech. 2002g. “Final Groundwater Status Report: Summary of Groundwater Monitoring from March through October 2000, NAVSTA TI, San Francisco, California.” March 28.
- BCT. 2002h. “NAVSTA TI RPM and BCT Meeting Minutes.” May 7.
- Mendelian Construction Inc. 2002i. “Final Report Treasure Island, Yerba Buena Island, Asbestos Removal, Various Buildings.” May 13.

- BCT. 2002j. “NAVSTA TI RPM and BCT Meeting Minutes.” June 4.
- Tetra Tech. 2002k. “Final Corrective Action Plan, Sites 06, 14/22, 15, and 25, NAVSTA TI.” June 28.
- Tetra Tech. 2002l. “Environmental Closeout Strategy and Schedules, NAVSTA TI, San Francisco, California.” August.
- Tetra Tech. 2002m. “Final, Building 99 Source Area Technical Memorandum, Site 24, NAVSTA TI, San Francisco, California.” September.
- Tetra Tech. 2002n. “IR Site 12, Chemical- and Solid Waste-Contaminated Soil, Engineering Evaluation and Cost Analysis, NAVSTA TI, San Francisco, California.” September 18.
- Navy. 2002o. “Navy Environmental and Natural Resources Program Manual.” Naval Operations Instruction 5090.1B, change transmittal 3. October 17.
- Tetra Tech. 2002p. “Supplemental Site Inspection Report, IR Site 07, NAVSTA TI, San Francisco, California.” October 18.

2003

- BCT. 2003a. “NAVSTA TI RPM and BCT Meeting Minutes, January 7.”
- IT Corporation. 2003b. “Final Pilot Test Report Site 14/22, Treasure Island.” January 16.
- IT Corporation. 2003c. “Final Post-Construction Summary Report, Treasure Island Causeway Pipeline Removal and Closure, Petroleum Remedial Excavation Program, Treasure Island.” January 20.
- IT Corporation. 2003d. “Final October - December 2002 Quarterly Operations and Maintenance Report Treasure Island.” January 28.
- Architectural Systems Corp. 2003e. “Lead-Based Paint Abatement.” January 29.
- Water Board. 2003f. Letter Regarding Concurrence on NFA, Causeway Pipeline Removal, NAVSTA TI. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. March 11.
- Tetra Tech. 2003g. “Final Sampling and Analysis Plan, EBS Data Gaps Investigation.” April.
- Shaw Environmental Inc. (Shaw). 2003h. “Final January - March 2003 Quarterly Operations and Maintenance Report Treasure Island.” April 30.
- Shaw. 2003i. “Final Post-Construction Summary Report Parcel T086 Exploratory Trenching.” June 11.
- Shaw. 2003j. “Final Post-Construction Summary Report Building 530 Pipeline Removal and Closure Petroleum Remedial Excavation Program.” June 11.

- Shaw. 2003k. “Post-Construction Summary Report, Site 227 Remedial Excavation, Final, Revision 0.” June 16.
- Shaw. 2003l. “Final Sampling and Analysis Plan Addendum, EBS Data Gaps Investigation, NAVSTA TI.” June 26.
- Navy. 2003m. “Final Environmental Impact Statement.” June 27.
- EFA West. 2003n. “2002-2003 Storm Water Annual Report.” June 30.
- Shaw. 2003o. “Field Activity Report Soil and Groundwater Sampling Parcel T093, Final.” July 3.
- Water Board. 2003p. Letter Regarding Concurrence on NFA, Building 530 Pipeline Post-Construction Summary Report, NAVSTA TI, San Francisco. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. July 9.
- Water Board. 2003q. Letter Regarding Concurrence on Parcel T086 Trenching Post-Construction Summary Report, NAVSTA TI, San Francisco. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. July 9.
- Shaw. 2003r. “Quarterly Operations and Maintenance Report, April - June 2003, Final.” August 5.
- Shaw. 2003s. “Final Post-Construction Summary Report, Site 15 Remedial Excavation, NAVSTA TI Petroleum Remedial Excavation Program.” August 13.
- Tetra Tech. 2003t. “Final Groundwater Status Report: Summary of Groundwater Monitoring from May 2001 through August 2002, NAVSTA TI, San Francisco, California.” August 18.
- Water Board. 2003u. Letter Regarding Concurrence on Request for NFA, USTs 57 and 234, NAVSTA TI, San Francisco, California. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. September 5.
- Tetra Tech. 2003v. “Technical Memorandum, Polychlorinated Biphenyls (PCB).” September 12.
- Shaw. 2003w. “Post-Construction Summary Report, Site 14/22 In Situ Remediation System, Final, Revision 0.” September 24.
- Tetra Tech. 2003x. “Final Facilitywide UST Summary Report.” October.
- Shaw. 2003y. “Exploratory Trenching and Soil Excavation, Time-Critical Removal Action, Parcel T094.” October 23.
- Shaw. 2003z. “Post-Construction Summary Report, Site 25 In Situ Remediation System, Final, Revision 0.” November 3.

- Tetra Tech. 2003aa. “Groundwater Status Report: Summary of Groundwater Monitoring (May – Dec 2002) – Final.” November 14.
- Shaw. 2003bb. “Final July – September 2003 Quarterly Operations and Maintenance Report, Treasure Island.” November 19.
- Tetra Tech. 2003cc. “Final Corrective Action Plan, Inactive Fuel Lines, NAVSTA TI.” December 1.
- Tetra Tech. 2003dd. “Compendium of Groundwater Level Data, December 1994 through December 2002, Final.” December 1.
- Tetra Tech. 2003ee. “Interim Groundwater Status Report: Summary of Groundwater Monitoring at Sites 11, 12, 21, and 24 (May – Aug 2003) – Final.” December 1.
- Shaw. 2003ff. “Final Post-Construction Summary Report Site D1B Remedial Excavation NAVSTA TI Petroleum Remedial Excavation Program.” December 2.
- Water Board. 2003gg. Letter Regarding Concurrence on Request for NFA, Suspected USTs, NAVSTA TI, San Francisco, California. (Tanks 3A, 3B, 368C, 450, 452, 453, 461, M, 7, 145, 180F, 180G, 267, FF8, 213, 262). From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. December 2.
- Water Board. 2003hh. Letter Regarding Concurrence on Request for NFA, Site 4 and 19, NAVSTA TI, San Francisco. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. December 17.

2004

- Shaw. 2004a. “Final Technical Memorandum Recommendations for Polycyclic Aromatic Hydrocarbons at Petroleum Program Sites NAVSTA TI.” January 8.
- Water Board. 2004b. Letter Regarding Concurrence on Final Corrective Action Plan (CAP), Inactive Fuel Lines, NAVSTA TI, San Francisco. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. February 10.
- Water Board. 2004c. Letter Regarding Case Closure Letter for DoD USTs at NAVSTA TI including: UST 201 and UST 270. From Bruce H. Wolfe, Executive Officer, Water Board. To Ellen Casados, RPM, SWDIV. February 10.
- Shaw. 2004d. “Final October - December 2003 Quarterly Operations and Maintenance Report Treasure Island.” February 26.
- Science Applications International Corporation, PAR Environmental Services, Inc. and Far Western Anthropological Research Group, Inc. 2004e. “Final Archaeological Test Excavations at Yerba Buena Island, NAVSTA TI, San Francisco, California.” March.

- Shaw. 2004f. “Final Post-Construction Summary Report, Site 06 Fire Training School Remedial Excavation Naval Station Treasure Island Petroleum Remedial Excavation Program Treasure Island San Francisco, California.” March 30.
- Shaw. 2004g. “Groundwater Monitoring Report, May 2003 to January 2004, Final, Revision 3.” April 8.
- Shaw. 2004h. “Final Technical Memorandum, Additional Investigation at Environmental Baseline Study and Petroleum Program Sites, NAVSTA TI.” April 29.
- Sullivan Consulting Group (SULLIVAN) and Tetra Tech. 2004i. “Final Sampling and Analysis Plan PCB Sampling and Analysis Plan.” May 1.
- Tetra Tech. 2004j. “Final Groundwater Status Report: Summary of Groundwater Monitoring at Sites 11, 12, 21, and 24 (May through December 2003).” May 1.
- Shaw. 2004k. “Final Post-Construction Summary Report, UST Sites 140, 221, and 230, NAVSTA TI Petroleum Remedial Excavation Program.” May 6.
- Shaw. 2004l. “Final Technical Memorandum Additional Investigation at Environmental Baseline Study and Petroleum Program Sites at NAVSTA TI.” June 11.
- Water Board. 2004m. Letter Regarding Concurrence on Request for NFA, UST 140, 221, and 230 at NAVSTA TI, San Francisco, California. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. June 17.
- Tetra Tech. 2004n. 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.
- Tetra Tech. 2004o. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with La Rae Landers, BRAC PMO West, Lead RPM, NAVSTA TI. Conducted by Campbell Merrifield, Tetra Tech. June 25.
- EFA West. 2004p. “2003-2004 Storm Water Annual Report.” June 30.
- SulTech. 2004q. “Final Environmental Closeout Strategy and Schedules for NAVSTA TI.” July 30.
- Tetra Tech. 2004r. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Michael Mentink, Treasure Island Caretaker’s Site Office. Conducted by Patrick Callahan, Tetra Tech. August 9.
- Shaw 2004s. “Final Closure Report Site 227 Request No Further Action, NAVSTA TI, San Francisco, CA.” August 16.
- Shaw. 2004t. “Final Facilitywide UST Summary Report Update.” August 25.

- SulTech. 2004u. “Final Interim Groundwater Status Report: Summary of Groundwater Monitoring at Sites 12, 21, and 24, May 2004.” September.
- Water Board. 2004v. Letter Regarding Concurrence on Request for NFA, Site 15, NAVSTA TI, San Francisco. From Alan D. Friedman, Water Resource Control Engineer. To Ellen Casados, RPM, SWDIV. September [date illegible].
- SulTech. 2004w. “Final Interim Groundwater Status Report: Summary of Groundwater Monitoring at Sites 12, 21, and 24, May 2004.” September 1.
- Shaw. 2004x. “Final Groundwater Monitoring Report May 2004 to October 2004 Groundwater Monitoring Program Petroleum Remediation Program Sites.” September 13.
- Tetra Tech. 2004y. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Scott Anderson, U.S. Department of the Navy, Southwest Division Naval Facilities BRAC PMO West, RPM, NAVSTA TI. Conducted by Campbell Merrifield, Tetra Tech. September 14.
- Tetra Tech. 2004z. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with James Sullivan, BRAC PMO West, BRAC Environmental Coordinator, NAVSTA TI. Conducted by Campbell Merrifield, Tetra Tech. September 14.
- Shaw. 2004aa. “Final Closure Report Site 15 Request for No Further Action, NAVSTA TI.” September 15.
- Water Board. 2004bb. Letter Regarding Concurrence on Request for NFA, Site 227 (UST 227), NAVSTA TI, San Francisco. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. September 21.
- Tetra Tech. 2004cc. 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.
- Tetra Tech. 2004dd. 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. 2004ee. 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. 2004ff. 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. 2004gg. 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, Tetra Tech. October 4.
- Tetra Tech. 2004hh. 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 (PUC) Hetch Hetchy. Conducted by Campbell Merrifield, Tetra Tech. October 7.
- Navy. 2004ii. Letter Regarding Request for Concurrence on NFA for the Petroleum-Impacted Nuisance Soil Removal, NAVSTA TI, San Francisco. From Ron Plaseied, Base Closure Manager. To Alan Friedman, Water Board. October 15.
- Tetra Tech. 2004jj. 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 and Tetra Tech. 2004kk. “Draft PCB Summary Report, Former Naval Station Treasure Island, San Francisco, California.” November.
- BCT. 2004ll. NAVSTA TI RPM and BCT Meeting Minutes, and Attachment 5: Lead-Based Paint in Soil at Residential and Non-Residential Buildings; NAVSTA TI. November 2.
- SulTech. 2004mm. Personal Communication Regarding Known or Suspected Releases of Petroleum Products or Hazardous Substances on NAVSTA TI. Interview with Charles Smith, Caltrans. Conducted by Campbell Merrifield, Tetra Tech. November 30.
- SulTech. 2004nn. “Revised Draft Site 27 Feasibility Study; NAVSTA TI, San Francisco, California.” December 1.

2005

- SulTech. 2005a. “Draft Site 21 Remedial Investigation Report, NAVSTA TI, San Francisco, California.” January 1.
- BCT. 2005b. “NAVSTA TI RPM and BCT Meeting Minutes.” February 1.
- Shaw. 2005c. “Final Field Activity Report, Environmental Baseline Survey Data Gaps Investigation, NAVSTA TI, San Francisco, California.” February 22.

- SulTech. 2005d. “Final RI Report for Installation Restoration Sites 09 and 10; NAVSTA TI.” March 2.
- SulTech. 2005e. “Final Site 13 Record of Decision, NAVSTA TI, San Francisco, California.” March 4.
- DTSC. 2005f. Letter Regarding Final Field Activity Report, Environmental Baseline Survey Data Gaps Investigation, Naval Station Treasure Island. From David Rist, Hazardous Substances Scientist, Office of Military Facilities. To Scott Anderson, RPM, SWDIV, NAVFAC. March 11.
- Navy. 2005g. Letter Regarding Site 30/31 Boundary Redesignations. From La Rae Landers, Lead RPM, NAVSTA TI. To BCT. April 4.
- Navy. 2005h. “IR Site 13 Offshore Sediments Record of Decision.” April 7.
- Shaw. 2005i. “Final Closure Report Site D1B Request for No Further Action for Shallow Soils.” April 18.
- DSTC. 2005j. Letter Regarding No Further Action, Parcels T088 and T091, Naval Station Treasure Island, San Francisco. From Daniel E. Murphy, P.E., Chief, Berkeley Unit, Office of Military Services. To David Piermarini, California Engineers and Contractors. April 29.
- Shaw. 2005k. “Final Field Activity Report Environmental Baseline Survey Data Gaps Investigation.” May 9.
- Water Board 2005l. Letter Regarding Closure Report Sites F2A and F2B, Request for No Further Action, NAVSTA TI, San Francisco. From Alan Friedman, Water Resource Control Engineer, Water Board. To Ellen Casados, RPM, SWDIV. May 9.
- Shaw. 2005m. “Final Treatability Report In Situ Anaerobic Bioremediation Pilot Study Site 24 Building 99.” June 9.
- Shaw. 2005n. “Final Closure Report Site 14/22 Request for No Further Action.” June 13.
- Shaw. 2005o. “Final Addendum 2 to Final Project Plans In Situ Anaerobic Bioremediation Pilot Study, Site 21”. June 15.
- SulTech. 2005p. “Final Supplemental EBS, NAVSTA TI, San Francisco, California.” July 8.
- Water Board 2005q. Letter Regarding Closure Report SiteD1B, Request for No Further Action in Shallow Soil, NAVSTA TI, San Francisco. From Alan Friedman, Water Resource Control Engineer, Water Board. To Ellen Casados, RPM, SWDIV. July 20

- Weston Solutions, Inc. 2005r. “Draft Treasure Island Naval Station Historical Radiological Assessment, Former Naval Station Treasure Island, San Francisco, California.” August.
- Water Board 2005s . Letter Regarding Final Closure Report Sites F2A and F2B, Request for No Further Action, NAVSTA TI, San Francisco. From Alan Friedman, Water Resource Control Engineer, Water Board. To Ellen Casados, RPM, SWDIV. August 19.
- Navy. 2005t. “National Environmental Policy Act Record of Decision.” October 26.
- Water Board 2005u. Letter Regarding Draft Closure Report Site25 and Suspected Removed USTs 2B, 143A-143I, Request for No Further Action, NAVSTA TI, San Francisco. From Alan Friedman, Water Resource Control Engineer, Water Board. To Ellen Casados, RPM, SWDIV. November 12.
- Shaw. 2005v. “Final Closure Report Site 25, Request for No Further Action, Naval Station Treasure Island. December 10.

2.0 PROPERTY DESCRIPTION

NAVSTA TI is located in the San Francisco Bay ([Figure 1](#)), at mid-span of the San Francisco-Oakland Bay Bridge. The property available for transfer under this FOST consists of four noncontiguous areas on TI, labeled for the purposes of this property transfer as TI Southwest Transfer Parcels A and B, TI Southeast Transfer Parcel, and TI Core Transfer Parcel, as shown on [Figure 2](#). These areas are referred to herein as “FOST areas.”

The TI Southwest Transfer parcel, originally a single parcel, has been split into two parcels, A and B, and encompasses a total of 71.79 acres. TI Southwest Transfer parcel A includes portions or all of the following EBS parcels: T006, T023 through T028. TI Southwest Transfer parcel B includes portions or all of the following EBS parcels: T001 through T003, T029, T030, T033 through T035, T037 through T039, and T118 (Pier 23). The TI Southwest Transfer Parcels A and B are referred to collectively hereinafter as the TI Southwest Transfer Parcel. The southern part of the parcel has been used as an entrance thoroughfare for NAVSTA TI from 1943 to the present. The southern shoreline has been used primarily for reserve training. The northwestern area of the parcel was used for exposition halls, barracks, a dispensary, retail shops, fire station storage, tennis and basketball courts, and open space. The northern area of the parcel was used for open space, 1939 World’s Fair parking and storage structures, barracks, transformer housing, and offices.

The TI Southeast Transfer parcel encompasses 17.21 acres and includes portions or all of the following EBS parcels: T010, T015 through T018, and T119. Historically, the parcel was used for fuel storage, fuel dispensing, vehicle and equipment storage, and open space and parking.

The TI Core Transfer parcel encompasses 80.76 acres and includes portions or all of the following EBS parcels: T040 through T042, T048, T049, T051 through T056, T059, T061 through T064, T068, T070 through T073, T077 through T093, T106, and T120. Historically, the parcel has been used for a laboratory and radio school, classrooms, and barracks. This parcel has also been used for entertainment facilities, including a movie theater, sports courts, a bowling alley, a skating rink, an indoor swimming pool, an amusement center, and a baseball field.

The FOST areas comprise approximately 169.76 acres, and 55 buildings are present within the FOST areas. Former and projected future land uses of individual buildings within EBS parcels are discussed in the supplemental EBS ([SulTech 2005p](#)), which summarizes the status of the buildings on each parcel. Utilities in the FOST areas include sanitary sewer lines; storm drain lines; and electric, water, and natural gas lines.

3.0 REGULATORY COORDINATION

NAVSTA TI is not on the U.S. Environmental Protection Agency's (EPA) National Priorities List, and therefore it is not subject to a federal facility agreement. 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 Cal EPA San Francisco Bay Regional Water Quality Control Board (Water Board) on September 29, 1992 ([DTSC 1992e](#)). This legal agreement defines the Navy's obligations for corrective action and response action under the Resource Conservation and Recovery Act (RCRA) and CERCLA for 33 sites identified in the Navy's Installation Restoration Program (IRP) at NAVSTA TI. Since 1993, the BRAC Cleanup Team (BCT) has coordinated environmental cleanup and closure activities at NAVSTA TI, as well as the preparation of the basewide EBS and supplemental EBS. The BCT consists of representatives from the Navy, EPA Region 9, and DTSC. The Water Board is an advisor with regulatory authority overseeing groundwater issues.

[Figure 3](#) shows the current investigation sites at NAVSTA TI. No active CERCLA investigation sites are located within the FOST areas. Petroleum sites within the FOST areas are managed under the Petroleum Program and are described in [Section 6.1.2](#).

In January 2003, the BCT was notified of the initiation of this FOST. A draft FOST was provided to the regulatory agencies for their review on August 22, 2003. During the review process, the regulatory agencies raised concerns and requested additional information on polychlorinated biphenyls (PCBs) in electrical equipment fluids, in the FOST areas. Independent of the PCB investigation, the Navy initiated additional investigations into historical activities at NAVSTA TI involving the potential use of radiological material. The issuance of this FOST was delayed to conduct additional investigations of the potential for PCBs and to complete the historical radiological assessment in the FOST areas. This FOST and the associated supplemental EBS ([SulTech 2005p](#)) incorporates the results of those 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 2003m). A NEPA record of decision was signed October 25, 2005 (Navy 2005t).

5.0 ENVIRONMENTAL-CONDITION-OF-PROPERTY AREA TYPE

Environmental conditions at NAVSTA TI with respect to the presence of hazardous substances and petroleum products have been characterized in numerous documents in the course of environmental management activities at the base. Section 1.3 lists these documents. Among the NAVSTA TI environmental documents, the findings of the 1995 basewide EBS report (ERM-West 1995e), as amended by the 2005 supplemental EBS (SulTech 2005p), assisted the Navy in identifying properties that are suitable for transfer.

The DoD *BRAC Cleanup Plan Guidebook* (DoD 1996m) provides guidelines on classifying base property into one of seven environmental-condition-of-property (ECP) area types to facilitate and support reuse and transfer. The ECP area type designation 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 type designations are assigned to individual parcels of land known as EBS parcels. The 1995 basewide EBS (ERM-West 1995e) initially established the boundaries and numbering scheme for the NAVSTA TI EBS parcels. Since 1995, the original number of parcels has been modified to include submerged lands that will be disposed of by the Navy, and to eliminate parcels that originally were associated with piers that subsequently were demolished. Figure 2 shows the EBS parcel numbers and boundaries, along with their ECP area type designations, for TI.

The seven ECP area types, as defined in the *BRAC Cleanup Plan Guidebook* (DoD 1996m), are as follows:

- **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 have 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 FOST areas and the portion of the EBS parcel in the FOST area have been classified as ECP Area Types 1, 2, 3, or 4 as discussed in the supplemental EBS ([SulTech 2005p](#)). EBS parcels assigned ECP Area Type 2 are the result of petroleum releases, and EBS parcels assigned ECP Area Types 3 and 4 are principally the result of PCB detections in transformer vaults. The ECP area type for each EBS parcel is presented in [Table 1](#) and shown on [Figure 2](#).

6.0 ENVIRONMENTAL FACTORS

The documents listed in [Section 1.3](#) were evaluated to identify environmental factors, conditions, and resources present in the FOST areas to be transferred that may warrant constraints. [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 CONSTRAINTS AND/OR REQUIRE NOTIFICATION

The following subsections identify environmental factors that may warrant constraints 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 Section 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](#)).

Beginning in 1995, several surveys to identify the presence of ACM have been completed at NAVSTA TI. The Navy conducted an asbestos survey of 108 major nonresidential buildings at NAVSTA TI and compiled the results in an asbestos survey report in 1995 (MINS 1995k). In 1997, Radian, Inc. completed a more comprehensive asbestos survey for a total of 212 nonresidential buildings, including an inspection of the 108 buildings previously surveyed to estimate scope and costs for abating damaged, friable asbestos (Radian, Inc. 1997g, 1997j). In 1998, Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment, Vallejo (SSPORTS) performed an asbestos survey of underground steam utility lines and miscellaneous facilities. Results of the survey of underground steam utility lines indicated that ACM-wrapped pipes exist only within the TI Core Transfer Parcel (SSPORTS 1998p). Table 2 lists the buildings within the TI FOST parcel that were surveyed for ACM and indicates where remedies were implemented. Results of the underground steam utility line survey identified a single instance where ACM-wrapped pipes exist within the TI Core Transfer Parcel (SSPORTS 1998p).

Friable, accessible ACM identified during surveys was remediated beginning with 38 buildings in 1998 by Allied Technology Group, Inc. (ATG) (ATG 1998b, 1998d). ATG remediated an additional 20 buildings in 1998 (ATG 1998i). In 1999, SSSPORTS remediated friable ACM found in residences at both YBI and TI (SSSPORTS 1999g). In 2002, Mendalian Construction, Inc. covered the crawlspaces, posted ACM signs to seven barracks on TI, and abated and removed ACM from six quarters on YBI (Mendalian Construction, Inc. 2002i). All known damaged, friable, or accessible ACM has been abated within the FOST area, and remaining ACM does not pose a threat to human health.

Notices and restrictions related to asbestos are identified in Sections 8.1.2 and 8.2.7.

6.1.2 Petroleum Program

Although the Navy intends to obtain regulatory closure for all petroleum program sites within the FOST footprint, FOST areas may 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 CERCLA hazardous substance. CERCLA otherwise requires completion of response actions before transfer for substances included in the definition of hazardous substances (unless an early transfer is approved). Although the property may be transferred in advance of the Navy obtaining regulatory closure of these petroleum sites, the Navy will remain ultimately obligated to complete the regulatory closeout of petroleum sites. As petroleum and petroleum-related constituents are not included in the definition of hazardous substances under CERCLA (42 USC 9601[14]), the 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. CERCLA constituents if expected were included in the investigations and addressed in closure reports. Specifically, petroleum Site 15 was sampled for polycyclic aromatic hydrocarbons (PAH); the Building 530 Pipeline was sampled for PAHs and volatile organic compounds (VOC); the Causeway Pipeline was sampled for PAHs, VOCs, and lead; Site D1B was sampled for PAHs and VOCs; and Site 25 was sampled for VOCs. At each of these sites, the appropriate

regulatory agencies concluded that no further action was necessary to address the CERCLA constituents at the site. The Navy may fulfill the petroleum obligation by completing regulatory closeout activities under Navy direction or by requiring the transferee to complete such activities on behalf of the Navy as part of a negotiated transfer agreement.

The FOST areas include portions of petroleum CAP Sites 15 and 25, as shown on [Figure 3 \(Tetra Tech 2002k\)](#). CAP Site 15 received regulatory concurrence for NFA for petroleum contamination in shallow soils on September 5, 2003 ([Water Board 2003u](#)) and December 2, 2003 ([Water Board 2003gg](#)); concurrence on NFA for deep soils and groundwater was received from the Water Board in September 2004 ([Water Board 2004v](#)). CAP Site 25 received regulatory concurrence for NFA for petroleum contamination November 21, 2005 for shallow soil and groundwater, as well as closure of suspected removed USTs 2B and 143A through 143I ([Water Board 2005u](#)).

Elevated concentrations of petroleum hydrocarbons remain in place at Site 15 and Site 25 in both deep and shallow soils. Although the results of the risk evaluation indicate that these soils do not pose a significant risk to human or ecological receptors, future excavation or utility maintenance activities may potentially expose workers to petroleum-contaminated soil at greater depths ([Shaw 2004aa](#), [Shaw 2005v](#)). A notification and restriction will be placed on Sites 15 and 25 to protect workers at the site from residual petroleum in the soils and ensure any excavations are conducted safely and in accordance with regulatory requirements. See [Sections 8.1.5 and 8.2.5](#).

The petroleum pipeline CAP sites in the FOST areas include portions or all of Sites D1A, D1B, D1C, D2A, D2B, D4A, D4B, D5, and F2B ([Tetra Tech 2003cc](#)). Other fuel pipelines include the Causeway Pipeline ([IT Corporation 2003c](#)); and the Building 530 Pipeline ([Shaw 2003j](#)). [Figure 3](#) shows the locations and boundaries of these sites, which have been investigated under the petroleum and petroleum pipeline programs. Several of the pipeline sites have received concurrence for NFA, including the Causeway Pipeline on March 11, 2003 (where petroleum contamination has been left in place in the soil) ([Water Board 2003f](#)); the Building 530 Pipeline on July 9, 2003 ([Water Board 2003p](#)); pipelines D1A, D1C, D2A, D2B, D4A, D4B, and D5 on February 10, 2004 ([Water Board 2004b](#)) and pipeline F2B on May 9, 2005 and August 19, 2005 ([Water Board 2005l](#), [2005s](#)). Residual petroleum hydrocarbon contamination left in place at Sites D1B, D5, F2B and the Causeway pipeline requires a deed notification and restriction. See [Sections 8.1.5 and 8.2.5](#).

Subsequent to the NFA concurrence at Inactive Fuel Line CAP Sites D1A, D1B, F2A/F2B, and the Causeway Pipeline, additional investigations were recommended because of reported polycyclic aromatic hydrocarbon (PAH) detections. Further investigations at D1A did not detect PAHs at concentrations above soil screening criteria, and the Navy recommended the site for closure ([Shaw 2005c](#)), and concurrence was received from DTSC on March 11, 2005 ([DTSC 2005f](#)). Further investigations at D1B and F2B did not detect PAH concentrations above the the soil screening criteria ([Shaw 2004h](#)). The Water Board concurred with NFA at F2B August 19, 2005 ([Water Board 2005s](#)). Additional sampling at the Causeway Pipeline did not detect PAHs in soil samples at concentrations above the soil screening criteria, although PAHs were detected in a fragment of skeet from the site.

Corrective action and regulatory closure is ongoing at Site D1B however, the site requires a deed restriction to allow access, protect monitoring wells, protect treatment systems, and restrict disturbance of the soil and groundwater within the site boundaries. [Section 8.2.5](#) discusses these restrictions.

Groundwater and storm and sanitary sewers potentially provide pathways for contaminant migration from non-FOST parcels where releases have occurred to FOST areas. At NAVSTA TI, the potential for contamination to migrate from petroleum CAP and pipeline sites through groundwater and storm and sanitary sewers was evaluated in association with the CAP Program ([Tetra Tech 2002k, 2003cc](#)). Sampling for remediation and monitoring efforts indicated storm and sanitary sewers are not preferential pathways for migration of petroleum within the FOST area. No restrictions are considered necessary with respect to the storm and sanitary sewer systems. [Section 8.2.6](#) discusses restrictions on use and disturbance of groundwater.

6.1.3 Lead-Based Paint

Prior to transferring the property, the DoD is required to document survey results by disclosing known lead-based paint (LBP) and/or LBP hazards in the basewide EBS and by referencing the evaluation results in the FOST and transfer agreement or transfer documents for residential buildings/structures/facilities.

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 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 require LBP inspections or assessments for structures not defined as residential property, target housing, or child-occupied facilities. Title X 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. The FOST areas do not contain structures defined as residential property, target housing, or child-occupied facilities; accordingly, no LBP inspections were conducted in anticipation of transfer.

The following sections summarize the history of the Navy’s management of LBP on the FOST areas, as well as specific notifications and restrictions regarding the presence of LBP in some of the buildings, structures, or facilities situated within the FOST areas.

6.1.3.1 Residential Housing

No residential housing is located within the FOST areas.

6.1.3.2 Nonresidential Buildings

In order to address the risk of adverse health effects to children from LBP exposure, legislation and national policy regarding LBP have focused on residences and on buildings, structures, or

facilities where children may be present on a regular basis. Nonresidential buildings, structures, or facilities (such as warehouses and office buildings) are typically occupied by adults, with minimal exposure to children. Nonresidential buildings, structures, or facilities constructed prior to 1978 may not be used for residential use or child-occupied buildings, structures, or facilities unless the transferee performs any necessary evaluation(s) and abatements in accordance with all federal, state and local laws and other applicable requirements. The DoD will not conduct LBP evaluations at nonresidential buildings, structures, or facilities prior to transfer.

Because many nonresidential buildings on NAVSTA TI were constructed before 1978, LBP may be present on interior and exterior surfaces of these buildings. Navy policy does not require LBP surveys for commercial or industrial buildings unless the buildings will be reused for residential purposes. In the event such properties will be reused as residential properties, the transferee will be required to conduct renovation consistent with the regulatory requirements for abatement of LBP hazards. [Table 4](#) includes all nonresidential structures within the FOST area boundaries that were constructed before 1978, and will be provided to the transferee with the transfer documents. A notice, as described in [Section 8.1.3](#), will be included in the deed to advise the public of the potential existence of LBP on these buildings within the FOST areas. Restrictions related to LBP are presented in [Section 8.2.4](#).

Demolition of buildings, structures, or facilities containing or presumed to contain LBP must be performed in accordance with applicable local, state, and federal requirements.

6.1.4 Groundwater

Active, inactive, and abandoned monitoring and remediation well locations within the FOST areas are shown on [Figure 4](#). The deed will contain a restriction, described in [Section 8.2.6](#), to prevent disturbance of these active and inactive monitoring and extraction wells. Potential beneficial uses of groundwater in the San Francisco Bay Region are outlined in the Water Board's "San Francisco Bay Basin Water Quality Control Plan." More recently, the Water Board staff have determined the quality and the hydrogeologic conditions of the groundwater beneath TI are such that this water is not a potential source of drinking water pursuant to State Water Resources Control Board Resolution 88-63 and Water Board Resolution No. 89-39 ([Water Board 2001c](#)). Drinking water is supplied to NAVSTA TI by the San Francisco Public Utilities Commission (PUC), and the PUC's Hetch Hetchy Water and Power.

6.1.5 Polychlorinated Biphenyls

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

All Navy shore activities that generated, treated, stored, or disposed of PCBs were required to inventory or validate all PCBs and PCB items annually, in accordance with Navy procedures and federal and state regulations. Navy guidelines ([Navy 1994g](#)) specify that all transformers

containing 500 parts per million (ppm) or more of PCBs must have been eliminated by October 1998, and all transformers containing 50 ppm or more of PCBs must have been eliminated by October 2003.

In the 1980s, a remedial program was initiated by the Navy for devices such as high-voltage primary transformers containing dielectric fluid and possibly PCBs. By the mid-1980s, 21 transformers containing PCBs were removed from TI. In 1995, the Navy Public Works Center (PWC) in San Francisco completed a survey of the remaining 190 high-voltage electric transformers and circuit breakers (devices). The dielectric fluid from these devices was sampled and analyzed for PCBs (PWC 1994f, 1995c). As a result of this survey, by 1996, six transformers were removed from TI (PWC 1997f). Also in 1995, the EBS documented the presence, former presence, or potential presence of devices with dielectric fluid that potentially contained PCBs (ERM-West 1995e). A subsequent site walk by SSPTS produced a list of "transformers and oil-filled switches sighted at Treasure Island" (SSPTS 1997i). The list recorded serial numbers and Navy numbers, described the location of each device, and referenced individual entries of the PWC inventory list, where possible.

Table 5 identifies the current and former electrical equipment present in the FOST areas documented in these surveys. The 1995 EBS (ERM-West 1995e) also documented spills and stains potentially related to PCBs. Electrical equipment remaining on the FOST areas contains PCBs at concentrations less than 50 ppm.

Additional sampling and analysis of current and former transformer locations within the FOST areas for PCBs was undertaken in 2004 at locations shown on Figure 3. As a result, eight areas were identified within the FOST area boundaries with elevated PCB concentrations that do not meet TSCA requirements. Navy will address these sites prior to transfer following TSCA criteria. As a result, both a notice and restriction are required for these sites.

There will be notices and covenants restricting use and access and requiring the transferee to maintain the selected remedy of PCB sites as appropriate. For vaults in buildings, if PCBs are present at concentrations exceeding TSCA criteria, access to the vaults will be restricted to authorized personnel with appropriate levels of personal protective equipment. Any modifications to the vault must comply with all regulations regarding PCBs as appropriate. Unoccupied buildings with elevated concentrations of PCBs in transformer vaults will be restricted from use until the building is demolished; or if reuse is to occur, until the PCBs have been addressed by the transferee. The notices and restrictions necessary for the eight areas are presented in Section 8.1.6 and Section 8.2.8.

6.2 ENVIRONMENTAL FACTORS THAT WARRANT NO CONSTRAINTS

This section discusses properties with 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. The spills and stains noted during the 2004 visual site inspection, as reported in the SEBS, were releases to concrete in the interior of buildings and did not constitute releases to the environment (SulTech 2005p).

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 risks 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 is estimated to be 1.3 pCi/L, and about 0.4 pCi/L of radon is usually found in the outside air. No laws require testing or remediation for radon, but 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 determine the extent of radon contamination in such buildings (15 USC Section 2669).

A Navy radon assessment and mitigation program began with a screening phase in 1989. The Navy radon assessment and mitigation program consists of (1) an initial screening phase to identify housing projects, school and daycare facilities, barracks, hospitals, and brigs with elevated radon levels; (2) a detailed assessment to collect samples from buildings in which elevated levels of radon gas were found during the initial screening; and (3) a mitigation phase to perform corrective actions in buildings with elevated radon levels. The Navy conducted radon screening for six representative locations at NAVSTA TI in 1991. Screening locations and results were presented in the 1995 EBS, and no screening was conducted within the FOST areas ([ERM-West 1995e](#)). The screening that was conducted at several locations on TI resulted in detections ranging from below the detection limit (0.5 pCi/L) at four locations to 0.6 pCi/L. No radon was detected at concentrations exceeding the EPA radon action level of 4 pCi/L, and therefore, NFA was required.

6.2.2 Radiological Contaminants

During the 1995 EBS, the Navy reviewed on-site records and searched for additional information on known and potential uses of radiological contaminants at the base. Based on a 1995 survey and subsequent historical radiological assessment conducted by the Navy’s Radiological Affairs Support Office (RASO) in 2004 and 2005, no structures or areas within the FOST areas were identified as being used for radiological activities and requiring further action ([Weston Solutions, Inc. 2005r](#)).

6.2.3 Storm Sewers

All surface water at NAVSTA TI is drained into the surrounding bay by means of natural drainage pathways or through the storm sewer system. The storm sewer system provides a pathway to the bay for potential contamination originating from operations on NAVSTA TI. 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 the San Francisco Bay. Sediments in the storm sewer system at NAVSTA TI were identified as potentially contaminated with metals, pesticides, PAH, and

petroleum hydrocarbons. Storm sewers have been investigated in association with Site 13, the storm water outfalls and sediment in San Francisco Bay.

During the Phase I ecological risk assessment (ERA) at NAVSTA TI, conducted in 1993, chemicals of potential ecological concern were identified using data collected during the storm water investigation for drainage areas served by each storm water outfall. 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 off-shore sediments. Sampling focused on tracking contaminants from onshore sources to off-shore sediments through storm water outfalls. Samples were collected from sediment present in on-shore catch basins and adjacent to storm water outfalls as well as samples of storm water from selected storm water outfalls. The 1997 off-shore sampling for the Phase II remedial investigation (RI) was more comprehensive and included chemical analysis of sediments and pore water, invertebrate bioassays, and tissue residue analysis. Because the Phase II investigation 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 the off-shore sediments, and thus were given more weight in the ERA than Phase I data. Additionally, the approximate locations sampled in Phase I were resampled in Phase II. Based on the information and data evaluated in the off-shore RI, the chemical levels present in the sediments do not pose a level of risk to ecological receptors and requires no action. No further investigation or remedial action was recommended for Site 13 offshore areas ([Tetra Tech 2001j](#)). A No Action Record of Decision was signed by the Navy and regulatory agencies on April 7, 2005 ([Navy 2005h](#)).

6.2.4 Installation Restoration Program

Work under the IRP was initiated at NAVSTA TI in the 1980s and continues at present. Thirty-three IRP sites have been identified basewide; 26 sites were identified during the preliminary assessment/site inspection conducted in 1988 ([Dames and Moore 1988](#)), 3 sites were identified prior to the subsequent Phase II RI, and 4 sites were identified between 2002 and 2004. Of these 33 sites, 3 sites (Sites 1, 15, and 25) are located within the FOST areas shown on [Figure 3](#).

Of the three IRP sites within the FOST area, one has been closed requiring NFA (Site 1) ([DTSC 2002e](#)), and the remaining two sites (Sites 15 and 25) were moved out of the CERCLA Program and into NAVSTA TI's Petroleum Program because site investigations determined only petroleum constituents were detected at these sites. See [Section 6.1.2](#) for further discussion regarding these sites. As petroleum and petroleum-related constituents are not included in the definition of hazardous substances under CERCLA (42 USC 9601[14]), the petroleum constituents are being remediated under the 1994 California UST regulation (22 CCR 11, 2720), which address releases to soil and groundwater from former USTs, aboveground storage tanks (AST), and pipelines.

6.2.5 Aboveground Storage Tanks

The Navy followed closure procedures for inactivated ASTs that include (1) emptying and cleaning ASTs and associated pipelines, and (2) recording conditions of the sites. Inspections for spills and stains surrounding the 30 ASTs located within the FOST areas were conducted as part

of the 1995 EBS ([ERM-West 1995e](#)). Any release associated with an AST that required investigation, as determined in consultation with the BCT, is included under the IRP as a CERCLA or petroleum site.

[Table 3](#) presents an inventory of ASTs within the FOST areas along with information regarding tank size, contents, status, and associated site when available. The known locations of the ASTs within the FOST areas are shown on [Figure 3](#); 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 figures because historic information does not provide enough detail for placement on current figures.

Potential releases from ASTs are being investigated or have been investigated as part of an associated IRP site where applicable. Six ASTs remain active under lease agreements. They include tank 691 (reported as AST 672 in the CAP report [[Tetra Tech 2002k](#)]), 672 (reported as the brig tank in the CAP report [[Tetra Tech 2002k](#)]), and 540 at parcel T091; and three tanks (FF1-FF3, alternatively referred to as PP1-PP3 or 618A-C) used for liquid petroleum gas for the fire training school.

6.2.6 Petroleum Program

The FOST property includes petroleum sites that do not require notices or restrictions because they have either been closed or have been recommended for closure with NFA. These sites include pipeline sites and UST sites.

Pipeline sites located within the FOST property that have received concurrence from the Water Board for NFA are sites D1A, D1C, D2A, D2B, D4A, and D4B ([Water Board 2004b](#)), as well as the Building 530 pipeline ([Water Board 2003p](#)). The sites are either partially or wholly contained within the FOST areas. The pipelines are shown on [Figure 3](#).

In addition to the pipeline sites, a number of UST sites within the FOST areas do not require notices or restrictions since the tanks have been removed or closed in place. The Navy has investigated underground storage tanks (UST) in the FOST areas at NAVSTA TI. As USTs are closed and corrective actions completed, closure reports are prepared for the former USTs, and then submitted for review and regulatory closure or concurrence that no further action (NFA) is required ([Tetra Tech 2003x](#), [Shaw 2004t](#)). For this FOST, reports of UST investigations and closure activities at NAVSTA TI were reviewed. Historical drawings, correspondence, and other related documents were also reviewed to provide a summary of closure activities and are summarized on [Table 3](#). Based on this review, USTs located within the FOST areas that have received NFA concurrence do not require notifications or restrictions.

[Table 3](#) presents an inventory of known and suspected USTs located within the FOST areas, 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. [Figure 3](#) shows the locations of all USTs in the FOST areas on TI.

Within the TI FOST area boundaries, 27 suspected USTs and one Navy-owned oil-water separator (OWS) were identified. Investigations for this FOST classified the suspected tanks into one of three categories: (1) tanks that have been located, (2) suspected tanks believed to have been removed or abandoned, and (3) previously suspected tanks that are believed to have never existed ([Tetra Tech 2003x](#), [Shaw 2004t](#)). The classifications of the suspected USTs within the FOST areas are discussed below.

1. **Tanks that have been located.** This category includes 12 UST sites. All of these sites have been approved for closure or NFA by the Water Board in the years noted: 1B through 1D, 1F, 2A, and 2D, in 1996 ([Water Board 1996l](#)); 257, in 1997 ([Water Board 1997q](#)); 1A, 1E, and 2C in 2002 ([Water Board 2002d](#)); 201 in 2004 ([Water Board 2004c](#), [2004bb](#)). In addition, the City and County of San Francisco (CCSF) closed UST 1G (469) in 2000 ([CCSF 2000g](#)) ([Tetra Tech 2003x](#), [Shaw 2004t](#)).
2. **Tanks believed to have been removed or abandoned.** This category includes 12 USTs that are suspected to have existed, but were removed previously or may have been abandoned: 2B, 15, 140, and 143-A through 143-I. The Navy received concurrence from the Water Board that NFA was required for USTs 15 and 140 in 2004 ([Water Board 2004c](#), [2004m](#), respectively). NFA for the remaining USTs (2B and 143A - 143I) was requested in the Site 25 closure report ([Shaw 2005v](#)) and received November 21, 2005 from the Water Board ([Water Board 2005u](#)).
3. **Previously suspected tanks that never existed.** Three USTs were identified as nonexistent after site investigation work including magnetic surveys, probes, and soft digs did not indicate the presence of USTs. The Water Board concurred in 2003 that NFA was necessary at the following sites: 450, 452, and 453, ([Water Board 2003gg](#)). In addition to the three USTs, the suspected OWS (T005) that was thought to have existed in Parcel T005 was identified as nonexistent ([ERM-West 1996e](#), [Tetra Tech 2003x](#), [Shaw 2004t](#)).

6.2.7 Other Locations of Concern

Other locations of concern were identified that are not within the CERCLA or Petroleum Programs. Other locations of concern involve issues such as stains and spills, potential historical adverse land use, and potential lead contamination not resulting from LBP.

6.2.7.1 Parcel T086

A buried 55-gallon drum was located in parcel T086 and removed, along with the affected soil, in February 2002. The contents of the drum were identified as liquid petroleum product. Further investigations in 2003 identified no additional sources of petroleum contamination at the site, and no impacts to soil or groundwater ([Shaw 2003i](#)). The Navy recommended the site for NFA and the Water Board concurred ([Water Board 2003q](#)).

6.2.7.2 Parcel T091

A tenant of TIDA leased parcel T091 and operated AST 540. Metal contamination was discovered in soil and petroleum contamination was discovered near AST 540 as a result of tenant activities. Upon termination of the lease, the tenant sought regulatory approval of the response actions taken in response to the release. Contaminants of concern at the parcel were identified as TPH and lead. Based on investigations following removal actions at the site, the DTSC concurred NFA was appropriate ([DTSC 2005j](#)).

6.2.8 Adjacent Properties

The IRP and petroleum sites located on adjacent properties that could potentially affect the FOST areas are discussed in this section. These sites are in the process of being investigated and corrective actions are being taken as appropriate. The schedule for completion of these investigations and corrective actions is contained within the FFSRA and Environmental Closeout Strategy and Schedules ([DTSC 1992e](#), and [SulTech 2004q](#)) and completion of actions for these sites is expected by 2010. To assess potential sources on adjacent properties, the following documents were reviewed:

- “Basewide EBS Report for NAVSTA TI” ([ERM-West 1995e](#)).
- “Final Supplemental EBS, NAVSTA TI, San Francisco, California” ([SulTech 2005p](#)).
- “Draft Final Onshore RI Report, NAVSTA TI, San Francisco, California” ([PRC 1997o](#)).
- “Final Groundwater Status Report: Summary of Groundwater Monitoring from March through October 2000, NAVSTA TI, San Francisco, California” ([Tetra Tech 2002g](#)).
- “Final Groundwater Status Report: Summary of Groundwater Monitoring from May 2001 through August 2002, NAVSTA TI, San Francisco, California” ([Tetra Tech 2003t](#)).
- “Groundwater Status Report: Summary of Groundwater Monitoring (May – December 2002) – Final” ([Tetra Tech 2003aa](#)).
- “Interim Groundwater Status Report: Summary of Groundwater Monitoring at Sites 11, 12, 21, and 24 (May - Aug 2003) – Final” ([Tetra Tech 2003ee](#)).
- “Groundwater Monitoring Report, May 2003 to January 2004, Final, Revision 3” ([Shaw 2004g](#)).
- “Final Interim Groundwater Status Report: Summary of Groundwater Monitoring at Sites 12, 21, and 24, May 2004” ([SulTech 2004u](#)).
- “Final Groundwater Monitoring Report May 2004 to October 2004 Groundwater Monitoring Program Petroleum Remediation Program Sites” ([Shaw 2004x](#)).

- “Letter Regarding Approval of NFA for Site 03 (Former Polychlorinated Biphenyl Storage Area), NAVSTA TI, San Francisco, California. From Anthony J. Landis, P.E., Chief, Northern California Operations, Office of Military Facilities, to Ms. Ellen Casados, RPM, BRAC PMO West” ([DTSC 2002f](#)).
- “Final Post-Construction Summary Report, Site 06 Fire Training School Remedial Excavation Naval Station Treasure Island Petroleum Remedial Excavation Program Treasure Island San Francisco, California” ([Shaw 2004f](#)).
- “Final Corrective Action Plan, Sites 06, 14/22, 15 and 25; NAVSTA TI” ([Tetra Tech 2002k](#)).
- “Supplemental Site Inspection Report, Installation Restoration Site 07, NAVSTA TI, San Francisco, California” ([Tetra Tech 2002p](#)).
- “Final RI Report for Installation Restoration Sites 09 and 10, NAVSTA TI” ([SulTech 2005d](#)).
- “Additional Characterization of Total Petroleum Hydrocarbons, Site 12 – Old Bunker Area, Soil and Groundwater Sampling Results, Final Technical Memorandum” ([Tetra Tech 1999c](#)).
- “IR Site 12, Chemical- and Solid Waste-Contaminated Soil, Engineering Evaluation and Cost Analysis, NAVSTA TI, San Francisco, California” ([Tetra Tech 2002n](#)).
- “Final Closure Report Site 14/22 Request for No Further Action.” ([Shaw 2005n](#)).
- “Technical Memorandum, Field Work Results – July through September 2001, Additional Investigation – Vessel Waste Oil Recovery Area, IR Site 21, NAVSTA TI, San Francisco, California” ([Tetra Tech 2002a](#)).
- “Draft Site 21 Remedial Investigation Report, NAVSTA TI, San Francisco, California” ([SulTech 2005a](#)).
- “Site 24 Additional Characterization Summary Report, NAVSTA TI, San Francisco, California” ([Tetra Tech 1998a](#)).
- “Final, Building 99 Source Area Technical Memorandum, Site 24, NAVSTA TI, San Francisco, California” ([Tetra Tech 2002m](#)).
- “Final Treatability Report In Situ Anaerobic Bioremediation Pilot Study Site 24 Building 99” ([Shaw 2005m](#)).

Based on the document review, the sites discussed below and shown on [Figure 3](#) that are adjacent to FOST areas are not potential sources of contamination to the FOST areas and are not further discussed in this FOST. For each of the sites discussed below, fugitive dust transported by natural causes has been eliminated as a potential hazard to the FOST area due to the lack of surface soil contamination in exposed bare soils. In addition, any soils that may become airborne during remedial activities will be addressed in remedial planning documents.

Site 03 – PCB Equipment Storage Area. This site is located on the southeastern edge of TI between the southwest and southeast transfer parcels. The chemicals of potential concern at the site were PCBs. The site received closure from the DTSC in March 2002 ([DTSC 2002f](#)).

Site 06 – Former Fire Training School. This site is located on the northern edge of the island, adjacent to the TI Core Transfer Parcel. The chemicals of potential concern in soil are petroleum and geochemical-related compounds (including arsenic and other trace metals) and dioxins. The site is listed as both a CERCLA site and Petroleum CAP site, and a petroleum closure report is being drafted, as well as an RI report. Dioxins are generally insoluble in water and would not be expected to be mobile in groundwater. In addition, Site 06 is located downgradient from the TI Core Transfer Parcel and the contaminant location is separated from the FOST areas by more than 100 feet. All investigations at the site are complete and it is currently undergoing closure for petroleum and CERCLA. Site 06 is not expected to affect the soil or groundwater located within the FOST areas.

Site 07 – Pesticide Storage Area. This site is located in the northeastern portion of TI adjacent to the TI Core Transfer Parcel. No elevated concentrations of chemicals above the field screening criteria have been detected in soil or groundwater samples from Site 07 ([Tetra Tech 2002g](#), [2002p](#)); therefore, soil or groundwater from this site does not have the potential to affect the FOST areas. A supplemental site inspection report submitted on October 18, 2002, recommended NFA, and a closure letter is anticipated from the DTSC.

Site 09 – Foundry. This site is located about 250 feet from the southern shore of TI at Building 41, adjacent to the TI Southwest Transfer Parcel. Chemicals of potential concern in soil include solvents, lead, and petroleum products; an RI report has been finalized ([SulTech 2005d](#)). Elevated concentrations of chemicals in groundwater associated with the potential contaminant release sources at Site 09 have not been consistently detected ([SulTech 2005d](#)). Groundwater generally flows southeast toward the shoreline at Site 09, parallel to the FOST area boundary. The site boundary includes a buffer and is covered by pavement. The RI concluded the site does not pose a risk to human health or the environment, and therefore does not have the potential to affect the FOST area.

Site 10 – Bus Painting Shop. This site is located along the shoreline in the northeastern portion of TI at Building 335, adjacent to the TI Core Transfer Parcel. Chemicals of potential concern in soil include pesticides and semivolatile organic compounds; an RI report has been finalized ([SulTech 2005d](#)). No chemicals have been detected in the groundwater above the field screening criteria at Site 10 ([SulTech 2005d](#)). In August 2004, a Navy contractor encountered a 2-inch-thick layer of heavy (very viscous) petroleum and dioxins in the surface soil along the eastern side of the boundary for Site 10 and near the rip-rapped shoreline. The soil was excavated to a depth of 1 foot below grade under petroleum “nuisance” criteria and sampled for dioxins, total petroleum hydrocarbons (TPH), volatile organic compounds (VOC), and PAHs. Nuisance soil is defined as either odorous or visibly impacted soil present from 0-2 feet bgs in unpaved areas. Sampling confirmed the complete removal of the petroleum layer and dioxin in the excavated area. The Navy requested NFA concurrence from the Water Board for the petroleum portion only ([Navy 2004ii](#)). The Navy plans to address the dioxin in surface soil under the CERCLA Program. The site boundary includes a buffer; therefore, no dust hazards would likely be associated with

Site 10. Site 10 is located downgradient from the TI Core Transfer Parcel; therefore, no mechanism is apparent to transport soil contaminants from this site to the FOST area.

Site 12 – Old Bunker Area. This site is located on the northwestern portion of TI and occupies about 94 acres of the island. The site is adjacent to the TI Southwest and TI Core Transfer Parcels. Soil removal actions have been conducted at Site 12 to remove hazardous materials. An RI and Risk Assessment Work Plan is being drafted for Site 12. Metals, PCBs, dioxins, chlorinated VOCs, PAHs, and petroleum hydrocarbons have been detected at elevated levels in groundwater and soil samples from Site 12 ([Tetra Tech 2003aa](#)); however, groundwater generally flows toward the shoreline, away from or parallel to the FOST area boundaries. Furthermore, the bunkers, storage yards, and solid waste disposal areas of greatest concern at Site 12 are located more than 0.25 mile from the boundary of the TI Core Transfer Parcel, so migration of contaminants outside of the site is highly unlikely. Potential dust hazards associated with remedial activities at the site will be addressed in future work plans. No mechanism is apparent to transport contaminated soil outside of the Site 12 boundary. No mechanism is apparent to transport soil or groundwater contaminants from this site to the FOST areas.

Site 14/22 – New Fuel Farm/Navy Exchange Service Station. This site is located along the shoreline in the northeastern portion of TI adjacent to the TI Core Transfer Parcel. Fuel storage and dispensing activities at Site 14/22 resulted in releases of diesel, waste oil, and gasoline into the environment. A full-scale treatment system including air sparging and soil vapor extraction was installed in the area of the former USTs and operated from 2001 through early January 2004. The system was effective in removing TPH. Remedial excavation activities were performed in four areas at Site 14/22 from March 1 to June 28, 2004 to remove TPH, lead, and PAH-contaminated soil. Subsequent dioxin investigation to the north of the Site 14/22 and remediation activities are scheduled to proceed under the Navy's CERCLA program and will be reported in a separate document ([Shaw 2005n](#)). Groundwater flows towards the shore, away from the FOST areas, and future work plans will address potential dust hazards associated with remedial activities at the sites. No mechanism is apparent to transport soil or groundwater contaminants from this site to the FOST areas.

Site 21 – Vessel Waste Oil Recovery Area. This site is located on the southeast portion of TI, directly adjacent to San Francisco Bay and Clipper Cove, near the TI Southeast Transfer Parcel. Elevated concentrations of solvents have been detected in groundwater at Site 21 ([Tetra Tech 2002a](#), [2003aa](#), and [SulTech 2005a](#)). Groundwater at Site 21 flows toward the southeast, away from the FOST area; therefore, no mechanism is apparent to transport groundwater contaminants from this site to the FOST area.

Site 24 – Dry Cleaning Facility. This site is located in the eastern portion of TI, adjacent to TI Southwest and Core Transfer Parcels. Elevated concentrations of solvents and petroleum hydrocarbons have been detected in groundwater and soil at Site 24 ([Tetra Tech 2002m](#), [2003aa](#)). In 2001, IRP Sites 05 and 17 were closed and merged with Site 24. Groundwater generally flows in a northeastern direction in the A and B zones, partially in the direction of the TI Core Parcel; however, the boundaries of Site 24 were previously adjusted by the BCT to ensure that an adequate buffer exists between Site 24 and the TI Core Parcel. Further investigations to confirm the direction of groundwater flow in the C zone are ongoing. Furthermore, the Site 24 boundary includes a buffer zone around contaminated areas such that

migration of contaminants outside of the Site 24 boundary is unlikely. Potential dust hazards associated with remedial activities at the site will be addressed in future work plans if soil excavation is necessary. The depth of contamination is such that no mechanism is apparent to transport soil contaminants from this site to the FOST areas. Migration of contaminants from Site 24 to the FOST areas is unlikely.

Site 27 – Clipper Cove Skeet Range. This site is located in Clipper Cove between TI and YBI, adjacent to the marina and the TI Southwest Transfer Parcel, and has both upland and offshore portions. The site boundary was modified in 2004 to include upland portions in the site boundary. The chemicals of potential concern include lead shot in the sediments. The upland portion of the site is mostly paved. Based on the 2001 RI Report and ongoing investigation, the Navy has concluded that there are no unacceptable risks for human health and the environment within the TI FOST parcel ([Tetra Tech 2001j](#)).

Site 30 – Daycare Center. This site is located northwest of the TI Core Transfer Parcel. The chemicals of concern are copper, lead, and dioxins in soil associated with a disposal area. The BCT concurred with a boundary adjustment in 2005 ([Navy 2005g](#)). Soil contaminated with dioxins, and lead was investigated. In 2002 the Navy performed a time-critical removal action to remove accessible soil. The Navy also installed a 6-inch concrete cap adjacent to the daycare center to cover the 1,400-square-foot area around and between the locations contaminated with elevated concentrations of dioxins in the subsurface soil ([Shaw 2003o](#)). Since Site 30 was found to contain soil contamination only and exposed soil was removed or capped, Site 30 is not expected to affect soil or groundwater in the transfer parcel. An RI report is being prepared. This site is paved, and no mechanism is apparent to transport contaminated soil outside the Site 30 boundary. Potential dust hazards associated with remedial activities at the site will be addressed in work plans. Migration of contaminants from Site 30 to the FOST areas is unlikely.

Site 31 – Former South Storage Yard. This site is located north of Site 30 and adjacent to the TI Core Transfer Parcel. The BCT concurred with a boundary adjustment in 2005 ([Navy 2005g](#)). An initial investigation identified elevated concentrations of lead, PCBs, and DDT above screening levels in soil and below screening levels in asphalt. Additional investigations of soil identified concentrations of TPH as diesel and motor oil, PAHs, and dioxins at the site. The asphalt currently serves as a protective barrier for contaminated soil. An RI is being prepared. Potential dust hazards associated with remedial activities at the site will be addressed in future work plans. Migration of contaminants from Site 31 to the FOST areas is unlikely.

Site 32 – Former Training and Storage Area. This site is located in EBS Parcel T111, approximately 200 feet North of the TI Core Transfer Parcel. Chemicals of potential concern (COPC) in soil include PCBs, TPH as diesel and motor oil, dioxins, and pesticides. These COPCs were not detected in groundwater at Site 32 at concentrations above screening criteria, although metals were detected in groundwater above screening criteria. An RI report is being prepared. Since Site 32 was found to contain soil contamination only, Site 32 is not expected to affect soil or groundwater in the FOST area. The site is paved, and no mechanism is apparent to transport contaminated soil outside of the Site 32 boundary. Potential dust hazards

associated with remedial activities at the site will be addressed in the work plans for those activities. Migration of contaminants from Site 32 to the FOST area is unlikely.

Site 33 – Former Water Line Replacement Area. The site is located adjacent to the TI Southwest and TI Southeast Transfer Parcels. Initial investigations reported dioxins and metals as chemicals of potential concern in soil, but they were not detected in subsequent soil sampling (Shaw 2004). Portions of the site are paved. An RI report is being prepared. The site boundary includes a buffer zone around contaminated areas such that migration of contaminants outside of the Site 33 boundary is unlikely. Potential dust hazards associated with remedial activities at the site will be addressed in the work plans for those activities. No mechanism is apparent to transport soil contaminants from this site to the FOST areas. Groundwater investigation of the site perimeter was conducted as part of the RI. However due to non-detect of the chemicals of concern, groundwater is not a concern at this site. Migration of contaminants from Site 33 to the FOST areas is unlikely.

7.0 PROPOSED REUSE

The proposed reuses for the FOST parcels are based on the preferred land-use alternative for NAVSTA TI set forth in the final EIS (Navy 2003m). The Navy evaluated the potential environmental impacts of several future land-use scenarios at NAVSTA TI and selected as the preferred alternative the reuse alternative that represented full implementation of the development scenario. The planned reuses of areas within the FOST parcels under the preferred alternative are shown on Figure 5, and include the following:

- The proposed reuse of the TI Southwest Transfer Parcel includes open space and recreation along the shoreline; hotels; film production; and a conference center.
- The proposed reuse of the TI Southeast Transfer Parcel includes publicly oriented uses and a theme park.
- The proposed reuse of the TI Core Transfer Parcel includes a mix of uses such as open space and recreation along the shoreline; institutional and community (new police and fire stations); sports fields; a theme park; and other public-oriented uses.

8.0 CONVEYANCE CONDITIONS AND NOTIFICATIONS

The FOST areas will be transferred in accordance with federal real property disposal laws. The proposed deed for transfer of the FOST areas 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, used below, refer to the Navy and the property recipient(s), respectively.

8.1 NOTICES

Notices to be provided in conjunction with property transfer of the FOST areas, either by deed or as part of this FOST, are provided in the following subsections.

8.1.1 Notice of Hazardous Substances

As required by CERCLA Section 120(h)(1) and codified at 40 CFR Part 373.1, notification of hazardous substance storage or releases is required for transfer of federal property at which any hazardous substance was stored for one year or more, or was known to have been released or disposed of. Notification must include the types and quantities of such hazardous substances, the time at which such storage occurred, and 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 40 CFR 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 40 CFR 302.4. Hazardous substances that are also listed under 40 CFR 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 FOST areas that require notification under CERCLA 120(h).

8.1.2 Asbestos-Containing Material

Available information on the existence, extent, and condition of ACM at building/structures/facilities within the parcels proposed for transfer is provided in [Table 2](#). This information was collected from the ACM surveys conducted between 1995 and 2004 at NAVSTA TI. Results of the survey of underground steam utility lines indicated that ACM-wrapped pipes exist only within the TI Core Transfer Parcel ([SSPORTS 1998p](#)).

The deed will contain a notice that the Grantee is hereby informed and does acknowledge hazardous materials in the form of asbestos or ACM have been found and are otherwise presumed to exist in buildings and structures in the FOST areas. The supplemental EBS and FOST disclose the presence of known asbestos or ACM in such buildings in the FOST areas.

In connection with its use and occupancy of the property, including, but not limited to (1) removal of ACM discovered during demolition or renovation of buildings/structures/facilities, and (2) demolition of any buildings/structures/facilities containing or presumed to contain asbestos or ACM, the transferee shall manage asbestos and/or ACM in accordance with all applicable federal, state, and local laws and other requirements relating to asbestos or ACM.

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 FOST areas 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 FOST areas. The Grantor will have no obligation under this subparagraph 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 need for notification of potential LBP at nonresidential buildings, structures, or facilities within the parcels proposed for transfer is based on the age of construction (that is, whether the building or structure was constructed before the Consumer Product Safety Commission's 1978 ban on LBP for residential use). The parcels proposed for transfer contain buildings, structures or facilities that were built prior to 1978 and may contain LBP. The age of many of the structures on the property suitable for transfer suggests the likelihood lead-based paint may be present on some of these structures. This in turn creates the possibility, through the action of normal weathering and maintenance; there may be lead from lead-based paint in the soil surrounding these structures. [Table 4](#) provides a list of all non-demolished buildings, structures or facilities within the parcels proposed for transfer and their corresponding dates of construction, along with information regarding the status of any known or assumed LBP.

With respect to notices, demolition of nonresidential buildings, structures or facilities built prior to 1978 creates the potential for lead to be released to soil as a result of such activities. With respect to any such nonresidential buildings, structures or facilities which the transferee intends to demolish and redevelop for residential use after transfer, the transferee may, under applicable law or regulation, be required by DTSC or other regulatory agencies to evaluate the soil adjacent to such nonresidential buildings, structures or facilities for soil-lead hazards, and to abate any such hazards that may be present, after demolition and prior to occupancy of any newly constructed residential structures.

The deed will contain a notice stating nonresidential buildings, structures, or facilities on the property that were built before 1978 are presumed to contain LBP because of their age. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. The Grantor will have no obligation under this subparagraph for the demolition of buildings or the removal of LBP or soil remediation related to such demolition or removal action.

[Table 4](#) lists the buildings constructed before 1978.

8.1.4 Drinking Water

The deed will contain a notice that lead was detected above the EPA action level of 15 micrograms per liter in the drinking water of the rear bathroom in Building 229. The building is located in EBS Parcel T054, in the TI Core Transfer Parcel, and has been historically a mixed-use facility accommodating a youth center, a pizza parlor, and offices.

8.1.5 Residual Petroleum Contamination

The deed will contain a notice stating that residual petroleum contamination has been left in place within the FOST area at the following petroleum sites that have received NFA [no further action] concurrence: shallow and deep soils at CAP Sites 15 and 25; deep soil (5.5 feet or more bgs) at Inactive Fuel Line Site F2B; shallow and deep soil at Inactive Fuel Line Site D5; and shallow soil (above 7 feet bgs) at the Causeway Pipeline Site (see [Figure 6](#)). The division between shallow soil and deep soil is intended to coincide with the top of the zone of water table fluctuation.

Residual petroleum contamination has been left in place within the FOST area at the following petroleum site that has not received NFA concurrence: shallow and deep soils at Inactive Fuel Line Site D1B (see [Figure 6](#)).

8.1.6 Polychlorinated Biphenyls

The deed will contain a notice that analytical results for spills related to electrical equipment with reported PCBs that exceed TSCA requirements inside of Buildings 1 (TX-114A, B, TX-140, TX-2045), 450 (TX-146), 452 (TX-139) and 453 (TX-138) in the TI Southwest Transfer Parcel, as shown on [Figure 6](#). Further, analytical results reported PCBs exceeding TSCA requirements at two outdoor transformer locations (TX-127 in parcel T081 and TX-147 in parcel T091) within the TI Core Parcel, as shown on [Figure 6](#).

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 PCB remediation in the FOST areas has been completed. This Notice of Release will be deemed to remove all notices and restrictions relating to PCBs for the FOST areas.

8.2 COVENANTS, WARRANTIES, AND RESTRICTIONS

Covenants, warranties, and restrictions to be included in the transfer deed are described in the following subsections.

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 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 property has been taken before the date of transfer.

8.2.2 Additional Remediation Obligation

The deed will include a covenant by the United States, made pursuant to the provisions of CERCLA 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 to the United States right of access to the property, pursuant to the provisions of CERCLA 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 Lead-Based Paint

The deed will contain a restriction that the transferee in its use and occupancy of the property, including but not limited to, demolition of buildings, structures or facilities and identification and/or evaluation of any LBP hazards, shall 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. Further, the transferee will prohibit occupancy and use of buildings and structures, or portions thereof, prior to identification and/or evaluation of any LBP hazards, and abatement of any hazards identified as required.

For non-residential buildings, the transferee agrees to restrict uses of buildings to non-residential use until the building is demolished. If the building or land is to be used or developed for residential use, the constituents driving risk, namely lead-based paint on surfaces or in soils, must be remedied, if necessary, and the remedy must be demonstrated to present no risk 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 the DTSC a covenant providing the DTSC with enforcement authority. Should a future transferee desire to release these restrictions, they would be obliged to separately remediate lead-based paint or PCBs on surfaces or in soils and petition both the Navy and the DTSC independently to obtain a release of the restriction from each party.

8.2.5 Petroleum Restrictions

8.2.5.1 Sites That Have Not Received NFA Concurrence

During the period from property transfer until regulatory closure and until the restriction is no longer necessary, unless specifically approved by the Navy on a case-by-case basis, no activities that will disturb the soil at 6 inches or more below current ground surface (such as excavation, grading, removal, trenching, filling, earth movement, or mining) shall be permitted

within Inactive Fuel Line Site D1B, as shown on [Figure 6](#). The deed will contain a covenant by the GRANTEE on behalf of itself, its successors, and assigns that prohibits any excavation, grading, removal, trenching, filling, earth movement, mining or other disturbance of the soil at or below 6 inches of the current ground surface of these sites without advanced written approval by the Navy. The deed may also contain a notice that the GRANTOR will 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 the soil at or below 6 inches of the current ground surface of these sites is no longer necessary, and the Navy agrees.

8.2.5.2 Sites That Have Received NFA Concurrence

The deed will contain a covenant by the Grantee on behalf of itself, its successors, and assigns that no activities within the FOST areas that will disturb the soil at or above or below the specified depth below current ground surface (such as excavation, grading, removal, trenching, filling, earth movement, or mining) shall be permitted within CAP Sites 15 and 25, Inactive Fuel Line Sites F2B and D5, and the Causeway Pipeline Site without a Water Board-approved soil management plan for the following areas shown on [Figure 6](#):

- Shallow and deep soils at CAP Site 15
- Shallow and deep soils at CAP Site 25
- Deep soil at 5.5 feet bgs and deeper at Inactive Fuel Line Site F2B
- Shallow and deep soils at Inactive Fuel Line Site D5
- Shallow soil (above 7 feet bgs) at the Causeway Pipeline Site

8.2.6 Groundwater Use Restriction

The deed will contain a covenant prohibiting the Grantee from disturbing existing groundwater monitoring and extraction wells, air sparging wells, and soil-vapor extraction wells located within the FOST areas shown on [Figure 4](#), unless specifically approved by the Navy. No groundwater production wells may be installed in the FOST areas for residential, municipal, agricultural, or industrial use without the written approval of DTSC and the Water Board.

8.2.7 Asbestos Restriction

The deed will contain a restriction that the Grantee covenants, on behalf of itself, its successors and assigns, as a covenant running with the land, that it will prohibit occupancy and use of buildings and structures, or portions thereof, containing known asbestos hazards before abatement of such hazards. In connection with its use and occupancy of the FOST areas, including, but not limited to, demolition of buildings and structures containing asbestos or ACM, it will comply with all applicable federal, state, and local laws relating to asbestos and ACM.

8.2.8 Polychlorinated Biphenyl Restriction

PCBs have been detected at elevated concentrations in several locations within the FOST parcels. The following table presents the current or former location of the transformer, the associated transformer identification number, and the maximum concentration reported in samples from the area adjacent to the transformer locations. The Navy will address the currently occupied sites pursuant to TSCA and based on agreements with DTSC prior to transfer by deed. The deed will contain appropriate notices and covenants restricting use and access and requiring the transferee to maintain the selected remedy of PCB sites as appropriate. For vaults in buildings, if PCBs are present at concentrations exceeding TSCA criteria, access to the vaults will be restricted to authorized personnel with appropriate levels of personal protective equipment. Any modifications to the vault must comply with all regulations regarding PCBs as appropriate. Unoccupied buildings with elevated concentrations of PCBs in transformer vaults will be restricted from use until the building is demolished; or if reuse is to occur, until the PCBs have been addressed by the transferee.

Pursuant to the existing Memorandum of Agreement executed in March 2000 between the Navy and the DTSC, the Navy will also grant to the DTSC a covenant providing the DTSC with enforcement authority. Should a future transferee desire to release these restrictions, they would be obliged to separately remediate lead-based paint or PCBs on surfaces or in soils and petition both the Navy and the DTSC independently to obtain a release of the restriction from each party.

EBS PARCEL	FOST PARCEL	Equipment ID Number	Building Occupancy Status	Building and Room	Maximum Concentration
T003	TI Southwest Parcel-B	TX-114A,B	Occupied	Building 1, Room 33	2.9 mg/kg
T003	TI Southwest Parcel-B	TX-140	Occupied	Building 1, Room 37-A	490 mg/kg
T003	TI Southwest Parcel-B	TX-2045	Occupied	Building 1, Room 37-A	490 mg/kg
T023	TI Southwest Parcel-B	TX-146	Unoccupied	Building 450	530 mg/kg 11 µg/cm ²
T034	TI Southwest Parcel-B	TX-138	Unoccupied	Building 453 Vault	320 mg/kg
T034	TI Southwest Parcel-B	TX-139	Unoccupied	Building 452 Vault	8.9 mg/kg
T081	TI Core Parcel	TX-127	NA	Outside Building 420	2.4 mg/kg
T091	TI Core Parcel	TX-147	NA	Outside	1.2 mg/kg

Notes:
 µg/cm² Microgram per square centimeter
 mg/kg Milligrams per kilogram
 NA Not applicable, transformer not inside a building

8.3 SUMMARY OF NOTIFICATIONS AND RESTRICTIONS

The notifications and restrictions contained in this section are based on findings summarized above in Sections 6.0, 8.1, and 8.2. The following table lists the required notices and restrictions and the section of this FOST to which they correspond.

Issue	Notification	Section	Covenant	Section	Restriction	Section
Asbestos Containing Material	✓	8.1.2			✓	8.2.7
Underground Storage Tanks						
Residual Petroleum Contamination	✓	8.1.5			✓	8.2.6
Petroleum Program						
Sites that have not received NFA concurrence					✓	8.2.5.1
Sites that have received NFA concurrence					✓	8.2.5.2
Lead-Based Paint	✓	8.1.3	✓	8.2.4	✓	8.2.4
Polychlorinated Biphenyls	✓	8.1.6	✓	8.2.4	✓	8.2.8
Radon						
Radiological Activities						
Groundwater Use Restriction					✓	8.2.6
Drinking Water	✓	8.1.4				
Storm Sewers						
Installation Restoration Program						
Aboveground Storage Tanks						
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		

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) have been met for the property, taking into account the potential risk of future liability.

Laura Duchnak
Laura Duchnak
Director, BRAC PMO West

February 15, 2006
Date

FIGURES



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

**FIGURE 1
 REGIONAL LOCATION MAP**

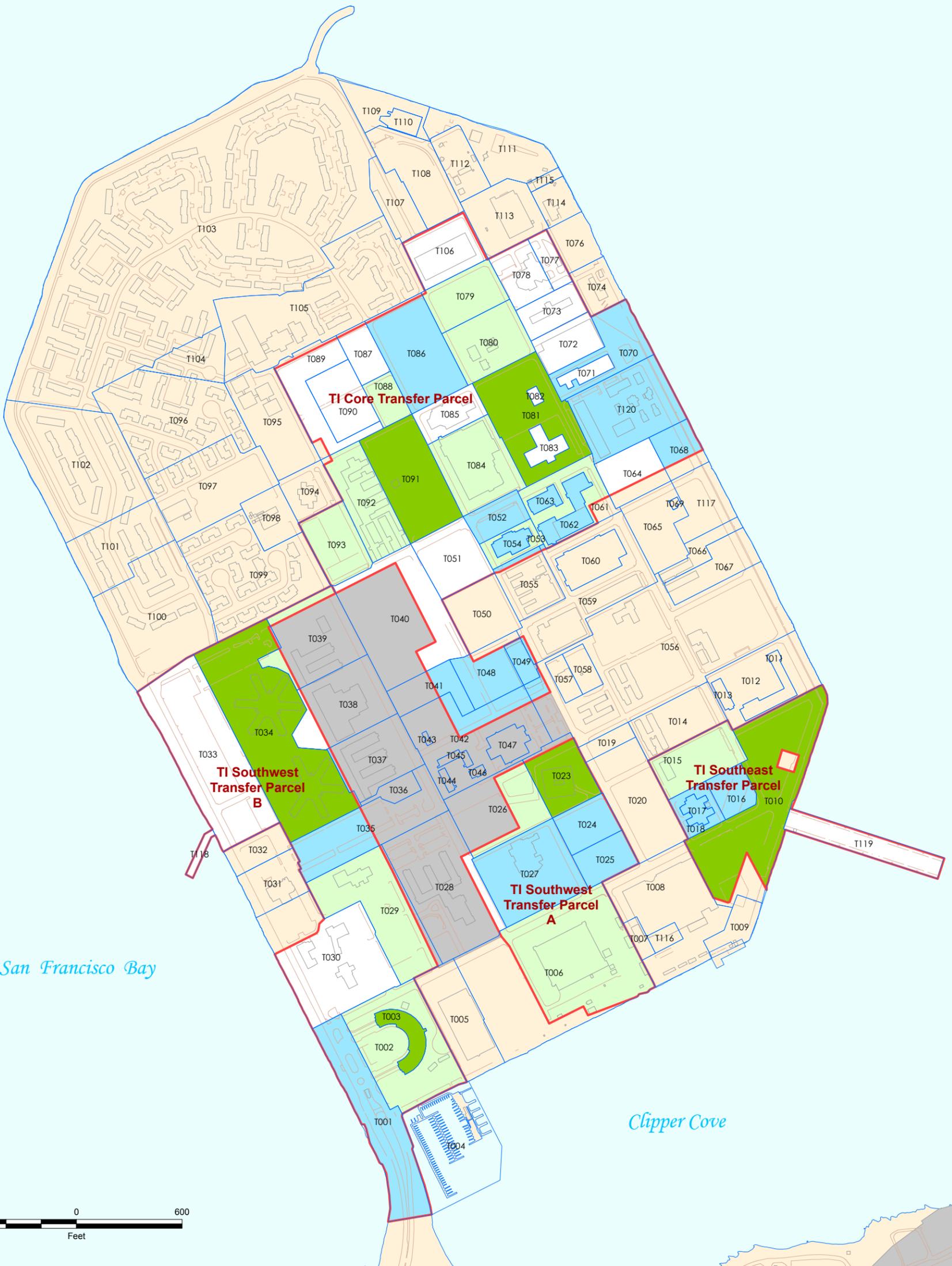
Final FOST, Treasure Island

Notes:
 FOST Finding of Suitability to Transfer

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



San Francisco Bay



- TRANSFER PARCELS
- PREVIOUSLY TRANSFERRED PROPERTY
- NON-FOST AREAS

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

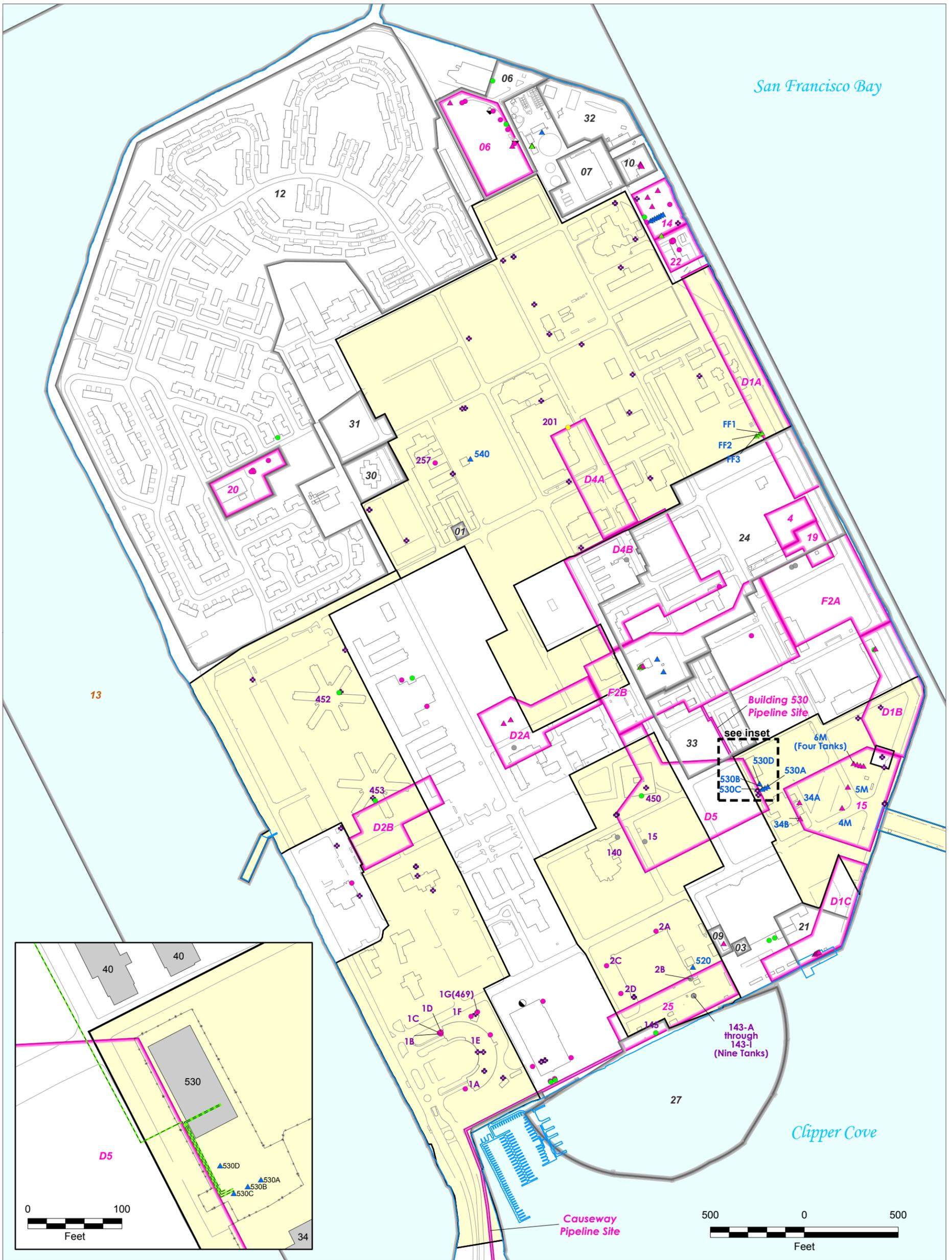
Notes:
 EBS Environmental baseline survey
 ECP Environmental condition of property
 FOST Finding of suitability to transfer
 TI Treasure Island



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, Treasure Island



- | | |
|---|--|
| <ul style="list-style-type: none"> ◆ PCB-CONTAINING EQUIPMENT ▲ ABOVEGROUND STORAGE TANKS ▲ Active ▲ Closed-in-Place ▲ Inactive ▲ Removed ▲ Suspected Removed ● UNDERGROUND STORAGE TANKS ● Closed-in-Place ● Previously Suspected ● Removed ● Suspected Removed ● Suspected | <ul style="list-style-type: none"> ● OIL-WATER SEPARATORS (OWS) ● Previously Suspected ◆ Removed ■ TRANSFER PARCELS ■ PETROLEUM CAP SITES AND INACTIVE FUEL LINE CAP SITES ■ CERCLA SITES ■ SHORELINE ■ BUILDINGS ■ BUILDING 530 FUEL PIPELINE, REMOVED OR CLOSED-IN-PLACE — ROADS — FENCES |
|---|--|

Notes:
 Some tanks with no precisely known locations are not shown on this map.
 CAP Corrective action plan
 CERCLA Comprehensive Environmental Response, Compensation, and Liability Act
 FOST Finding of suitability to transfer
 PCB Polychlorinated biphenyl

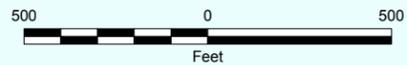
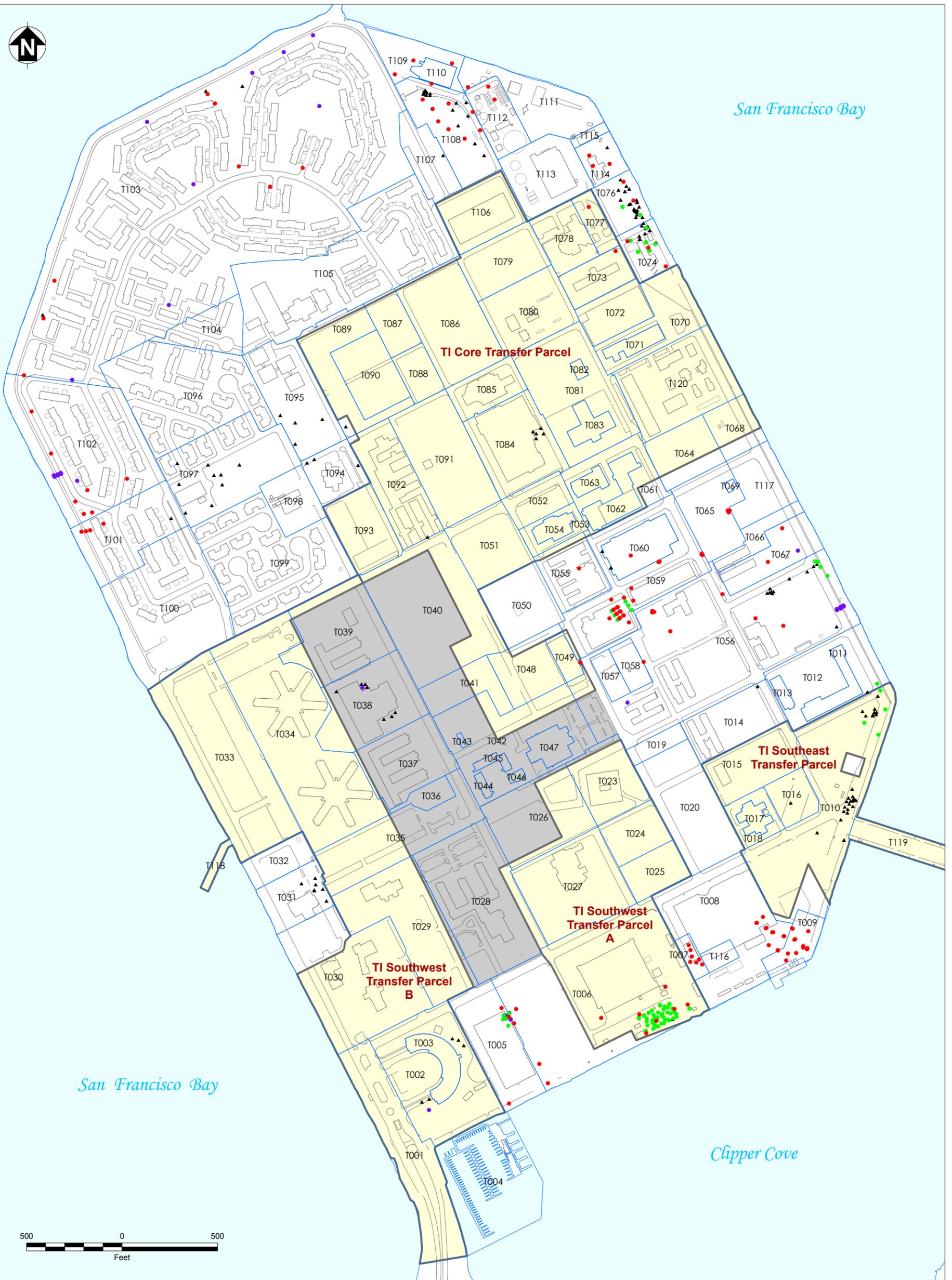


Naval Station Treasure Island
 U.S. Department of the Navy, BRAC PMO West, San Diego, CA

FIGURE 3
INVESTIGATION SITES
WITHIN AND ADJACENT TO THE
FOST AREAS
 Final FOST, Treasure Island



San Francisco Bay



- TRANSFER PARCELS
- PREVIOUSLY TRANSFERRED PROPERTY
- EBS PARCELS
- BUILDINGS
- ROADS

MONITORING AND REMEDIATION WELLS

- Active Monitoring Wells
- Active Remediation Wells
- Inactive Monitoring and Remediation Wells
- ▲ Abandoned and Destroyed Wells

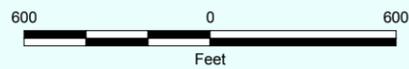
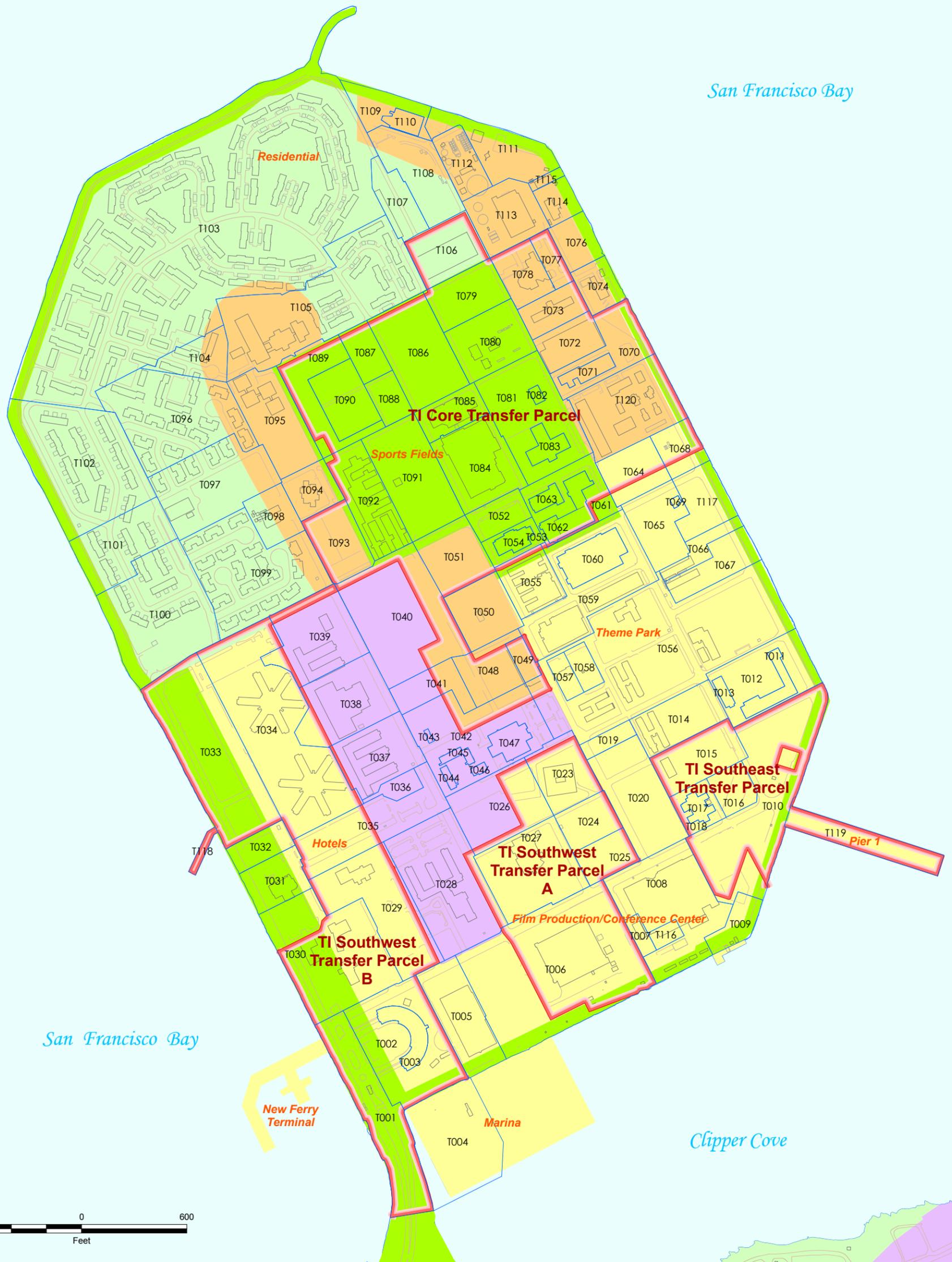
Notes:
 EBS Environmental baseline survey
 FOST Finding of suitability to transfer
 TI Treasure Island



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

FIGURE 4
LOCATIONS OF MONITORING
AND REMEDIATION WELLS

Final FOST, Treasure Island



- TRANSFER PARCELS
- EBS PARCELS
- BUILDINGS
- ROADS
- REUSE AREAS *
- Institutional and Community
- Open Space and Recreation
- Previously Transferred Property
- Publicly Oriented
- Residential

Notes:
 EBS Environmental baseline survey
 FOST Finding of suitability to transfer
 TI Treasure Island
 * U.S. Department of the Navy, Southwest Division Naval Facilities Engineering Command (SWDIV). 2003. "Final Environmental Impact Statement." June 27



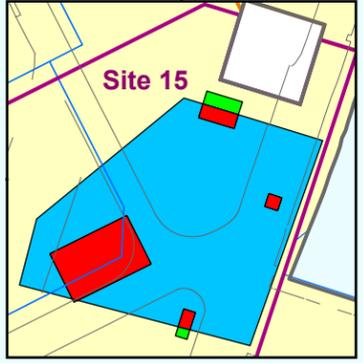
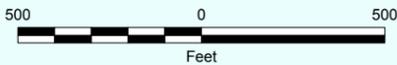
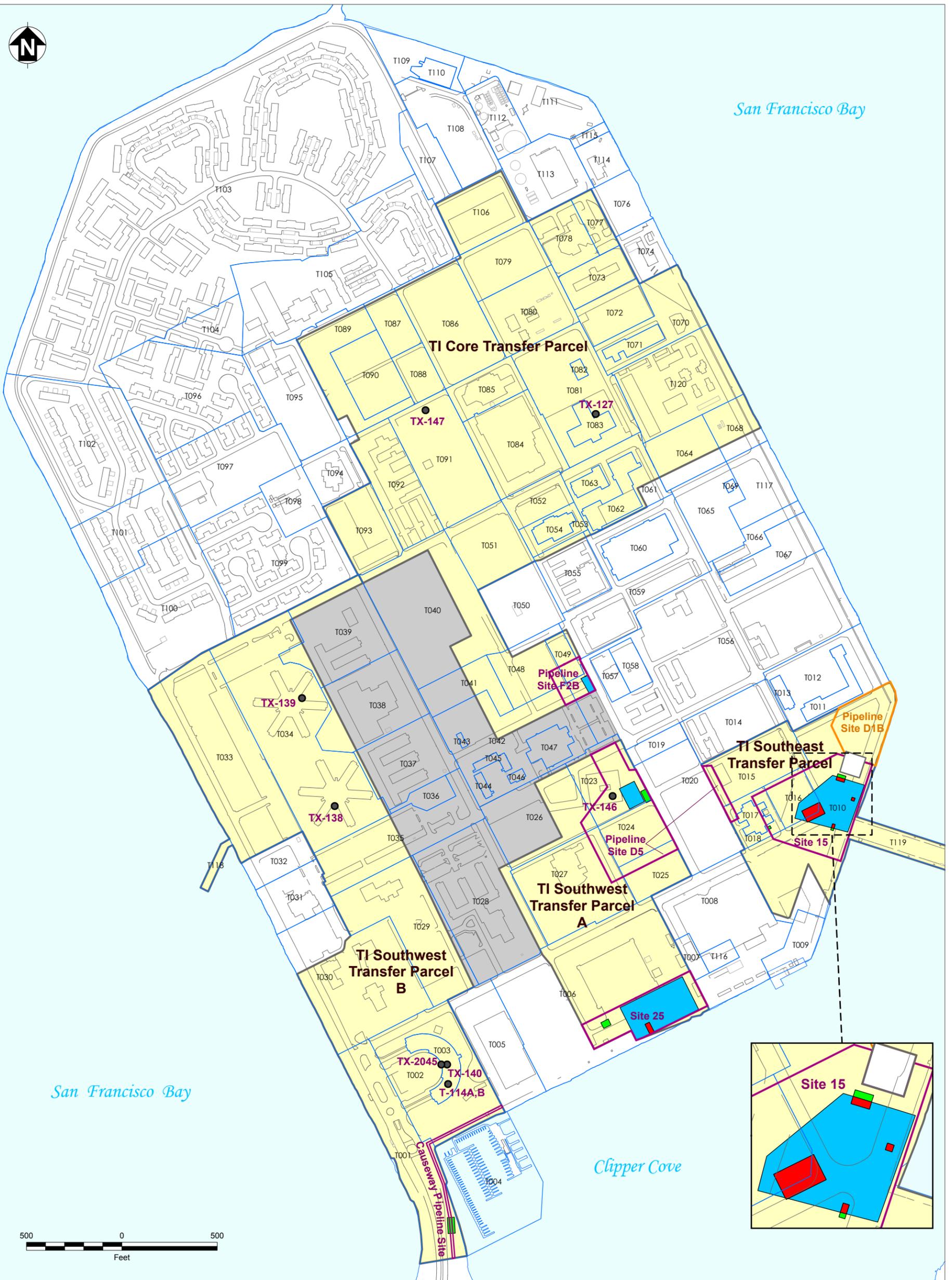
Naval Station Treasure Island
 U.S. Department of the Navy, BRAC PMO West, San Diego, CA

FIGURE 5
PLANNED REUSE AREAS

Final FOST, Treasure Island



San Francisco Bay



- PCB SITES SUBJECT TO RESTRICTION
- PETROLEUM SITES WITH NFA CONCURRENCE SUBJECT TO NOTICES AND RESTRICTIONS
- SITE RESTRICTED PENDING REGULATORY CLOSURE *
- TRANSFER PARCELS
- EBS PARCELS
- BUILDINGS
- ROADS
- DEED RESTRICTIONS *
- BOTH SHALLOW AND DEEP SOIL
- SHALLOW SOIL
- DEEP SOIL

Notes:
 EBS Environmental baseline survey
 FOST Finding of suitability to transfer
 NFA No further action
 TI Treasure Island
 * See Section 8 for actual depths associated with each restricted area.



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

FIGURE 6
AREAS SUBJECT TO
NOTICES OR RESTRICTIONS

Final FOST, Treasure Island

TABLES

TABLE 1: SUMMARY OF ECP AREA TYPES FOR EBS PARCELS IN FOST AREAS

Final Finding of Suitability to Transfer, Treasure Island

EBS Parcel	ECP Area Type	EBS Parcel	ECP Area Type
T001	2	T064*	1
T002	3	T068*	2
T003	4	T070	2
T006*	3	T071	1
T010*	4	T072	1
T015	3	T073	1
T016	2	T077	1
T017	2	T078	1
T018	2	T079*	3
T023*	4	T080	3
T024	2	T081	4
T025	2	T082	1
T026*	3	T083	1
T027	2	T084	3
T028*	1	T085	1
T029*	3	T086*	2
T030*	1	T087*	1
T033	1	T088	3
T034*	4	T089*	1
T035*	2	T090	1
T037*	2	T091	4
T038*	1	T092*	3
T039*	3	T093	3
T040*	1	T106	1
T041*	2	T118	1
T042*	2	T119	1
T048*	2	T120	2
T049*	2		
T051	1		
T052	2		
T053	3		
T054	2		
T055*	2		
T056*	2		
T059*	2		
T061*	3		
T062	2		
T063	2		

Notes:

* For ECP area type for portion of EBS Parcel located in the Findings of Suitability for Transfer (FOST) area, refer to [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, Treasure Island

EBS Parcel	Building	Surveyed	Asbestos Present	Friability	Asbestos Document*
T001	146	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T001	447	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T001	499	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T002	183	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T002	298	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T002	405	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T002	469	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T003	1	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
T006	2	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T006	114	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998b
T006	141	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997a
T006	143	Yes	<input type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T006	346	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T006	358	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T006	384	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Radian 1997b
T006	385	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
T006	413	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T006	448	Yes	<input type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T006	454	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T006	501	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T006	520	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T009	112	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T010	493	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T010	UN4	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
T010	UN5	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T015	530	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T016	396	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T017	34	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
T018	91	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
T023	450	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T024	395	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T027	140	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T027	398	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T029	449	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T029	481	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997a; SulTech 2005a
T030	187	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
T030	265	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	SSPORTS 1999a
T030	271	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T034	452	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T034	453	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T049	258	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T052	393	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T053	229A	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Radian 1997b
T054	229	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c

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

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	Building	Surveyed	Asbestos Present	Friability	Asbestos Document*
T062	261-A	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T062	261-B	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T063	401	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T071	215	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c; Mendelian Construction 2002
T072	216	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T073	217	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c; Mendelian Construction 2002
T077	671	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MINS 1995
T078	670	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MINS 1995
T080	377	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T080	570	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T080	572	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T082	497	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SSPORTS 1998b
T083	402	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T084	201	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T085	202	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T091	540	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T092	257	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c; Mendelian Construction 2002
T106	264	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ATG 1998c
T120	600	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	605	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	606	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	607	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	608	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	609	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	610	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	611	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	612	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	613	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	614	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	615	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	616	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b
T120	617	Yes	<input type="checkbox"/>	<input type="checkbox"/>	Radian 1997b

Notes:

Unchecked boxes means none identified

* Asbestos containing materials do not require regulatory concurrence

ATG Allied Technology Group, Inc

EBS Environmental baseline survey

MINS Mare Island Naval Shipyard

Radian Radian International LLC

SSPORTS Supervisor of Shipbuilding, Conversion and Repair, Portsmouth, Virginia, Environmental Detachment, Vallejo

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

Final, Finding of Suitability to Transfer, Treasure Island

EBS	Asbestos			
Parcel	Building	Surveyed	Present	Friability
				Asbestos Document*

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.

ATG. 1998c. "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 Quarter 62 at TI." August

MINS. 1995. "Final Asbestos Survey Report, NAVSTA TI." December.

Radian. 1997a. "Asbestos Survey Summary of 141 Buildings for NAVSTA TI." May
 Radian. 1997b. "Asbestos Survey Summary of 71 Buildings for NAVSTA TI." June.

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.

TABLE 3: SUMMARY OF UNDERGROUND STORAGE TANKS, OIL/WATER SEPARATORS, AND ABOVEGROUND STORAGE TANKS

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	ID	Material Stored/ Disposed	Capacity (gallons)	Tank Status	Regulatory Closure	Potential for Contamination Observed	Associated IR Site	Closure Document	ECP Area Type
T002	UST 1A	Diesel fuel	3,000	Removed	Closed	No; corrosion holes, pits and soil discoloration were not observed.	NA	Water Board 2002a	2
T002	UST 1B	Diesel fuel	1,000	Removed	Closed	No; corrosion holes, pits and soil discoloration were not observed.	NA	Water Board 1996	2
T002	UST 1C	Diesel fuel	500	Removed	Closed	No; corrosion holes, pits and soil discoloration were not observed.	NA	Water Board 1996	2
T002	UST 1D	Diesel fuel	500	Removed	Closed	No; corrosion holes, pits and soil discoloration were not observed.	NA	Water Board 1996	2
T002	UST 1E	Diesel fuel	900	Removed	Closed	No; corrosion holes, pits, and soil discoloration were not observed, but diesel was detected in soil samples (4,200 mg/kg)	NA	Water Board 2002a	2
T002	UST 1F	Diesel fuel	100	Removed	Closed	No; corrosion holes, pits and soil discoloration were not observed.	NA	Water Board 1996	2
T002	UST 1G(469)	Diesel fuel	2,000	Removed	Closed	No; corrosion holes, pits and soil discoloration were not observed.	NA	CCSFDPH 2000	1
T006	UST 143-A	Aviation fuel	4,000	Suspected removed	NFA	Yes; confirmed through soil and groundwater sampling.	Petroleum Site 25	Water Board 2005e	2
T006	UST 143-B	Aviation fuel	4,000	Suspected removed	NFA	Yes; confirmed through soil and groundwater sampling.	Petroleum Site 25	Water Board 2005e	2
T006	UST 143-C	Aviation fuel	4,000	Suspected removed	NFA	Yes; confirmed through soil and groundwater sampling.	Petroleum Site 25	Water Board 2005e	2

TABLE 3: SUMMARY OF UNDERGROUND STORAGE TANKS, OIL/WATER SEPARATORS, AND ABOVEGROUND STORAGE TANKS (Continued)

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	ID	Material Stored/ Disposed	Capacity (gallons)	Tank Status	Regulatory Closure	Potential for Contamination Observed	Associated IR Site	Closure Document	ECP Area Type
T006	UST 143-D	Aviation fuel	4,000	Suspected removed	NFA	Yes; confirmed through soil and groundwater sampling.	Petroleum Site 25	Water Board 2005e	2
T006	UST 143-E	Aviation fuel	4,000	Suspected removed	NFA	Yes; confirmed through soil and groundwater sampling.	Petroleum Site 25	Water Board 2005e	2
T006	UST 143-F	Aviation fuel	4,000	Suspected removed	NFA	Yes; confirmed through soil and groundwater sampling.	Petroleum Site 25	Water Board 2005e	2
T006	UST 143-G	Aviation fuel	4,000	Suspected removed	NFA	Yes; confirmed through soil and groundwater sampling.	Petroleum Site 25	Water Board 2005e	2
T006	UST 143-H	Aviation fuel	4,000	Suspected removed	NFA	Yes; confirmed through soil and groundwater sampling.	Petroleum Site 25	Water Board 2005e	2
T006	UST 143-I	Aviation fuel	4,000	Suspected removed	NFA	Yes; confirmed through soil and groundwater sampling.	Petroleum Site 25	Water Board 2005e	2
T006	UST 2A	Kerosene	70	Removed	Closed	No; corrosion holes, pits and soil discoloration were not observed.	NA	Water Board 1996	2
T006	UST 2B	Diesel fuel	Unknown	Suspected removed	NFA	No; release not indicated by soil and groundwater sampling.	Petroleum Site 25	Water Board 2005e	2
T006	UST 2C	Diesel fuel	1,500	Removed	Closed	Yes; visual soil contamination observed near fill pipe and soil discoloration and odor observed during tank removal.	NA	Water Board 2002a	2
T006	UST 2D	Diesel fuel	500	Removed	Closed	No; corrosion holes, pits and soil discoloration were not observed.	NA	Water Board 1996	2
T006	AST 520	Diesel fuel	15,000	Cleaned and inactive	NA	No	NA	Laidlaw 1998b	1

TABLE 3: SUMMARY OF UNDERGROUND STORAGE TANKS, OIL/WATER SEPARATORS, AND ABOVEGROUND STORAGE TANKS (Continued)

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	ID	Material Stored/ Disposed	Capacity (gallons)	Tank Status	Regulatory Closure	Potential for Contamination Observed	Associated IR Site	Closure Document	ECP Area Type
T010	AST 4M	Diesel fuel	210,000	Moved (See AST 4 in T076)	NA	No	Petroleum Site 15	NA	1
T010	AST 5M	Diesel fuel	210,000	Moved (See AST 5 in T076)	NA	No	Petroleum Site 15	NA	1
T010	AST 6M	Gasoline	10,000	Moved (See AST 6A-G in T076)	NA	No	Petroleum Site 15	NA	1
T015	AST 530A	Liquid caustic	6,000	Cleaned and inactive	NA	No	Petroleum Site D5	Water Board 2003d	1
T015	AST 530B	Sulfuric acid	6,000	Cleaned and inactive	NA	No	Petroleum Site D5	Water Board 2003d	1
T015	AST 530C	Diesel fuel	6,000	Cleaned and inactive	NA	No	Petroleum Site D5	Water Board 2003d	1
T015	AST 530D	Neutralizer	15,000	Cleaned and inactive	NA	No	Petroleum Site D5	Water Board 2003d	1
T018	AST 34A	Diesel fuel	50	Removed	NA	No	Petroleum Site 15	NA	2
T018	AST 34B	Fuel oil	Unknown	Removed	NA	No	Petroleum Site 15	NA	2
T023	UST 450	NA	Unknown	Previously suspected	NFA concurrence	Tank did not exist.	Petroleum Site D5	Water Board 2003e	1
T024	UST 15	Unknown	Unknown	Suspected removed	NFA concurrence	No; release not indicated by soil and groundwater sampling.	Petroleum Site D5	Water Board 2004a	1
T027	UST 140	Fuel oil	900	Suspected removed	NFA concurrence	No potential for contamination, based on investigation and soil sampling.	NA	Water Board 2004d	2
T034	UST 452	NA	Unknown	Never existed	NFA concurrence	Tank did not exist.	NA	Water Board 2003f	1

TABLE 3: SUMMARY OF UNDERGROUND STORAGE TANKS, OIL/WATER SEPARATORS, AND ABOVEGROUND STORAGE TANKS (Continued)

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	ID	Material Stored/ Disposed	Capacity (gallons)	Tank Status	Regulatory Closure	Potential for Contamination Observed	Associated IR Site	Closure Document	ECP Area Type
T034	UST 453	NA	Unknown	Never existed	NFA concurrence	Tank did not exist.	NA	Water Board 2003f	1
T068	AST FF1 (P1)	Liquid propane	20,000	Active	NA	No	NA	NA	1
T068	AST FF2 (P2)	Liquid propane	2,0000	Active	NA	No	NA	NA	1
T068	AST FF3 (P3)	Liquid propane	20,000	Active	NA	No	NA	NA	1
T078	AST 672	Diesel fuel	500	Active	NA	No	NA	NA	1
T080	AST 572	Hydraulic fluid	Unknown	Removed	NA	No	NA	NA	1
T084	UST 201	Diesel fuel	2,000	Closed-in-place	Closed	Yes; diesel detected in soil samples (7,700 mg/kg)	Petroleum Site D4A	Water Board 2004b	2
T085	AST 202	Water	Unknown	Inactive		No	NA	See SS 540; CCSFDPH 1998b	1
T091	AST 540	Diesel	15,000	Cleaned and inactive	NA	Closed by the Navy; re-opened by the tenant; as condition of the termination of the lease the tenant will close the AST.	NA	CCSFDPH 1998c	2
T092	UST 257	Diesel fuel	550	Removed	Closed	No; excavated soils used for backfill.	NA	Water Board 1997	2

TABLE 3: SUMMARY OF UNDERGROUND STORAGE TANKS, OIL/WATER SEPARATORS, AND ABOVEGROUND STORAGE TANKS (Continued)

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	ID	Material Stored/ Disposed	Capacity (gallons)	Tank Status	Regulatory Closure	Potential for Contamination Observed	Associated IR Site	Closure Document	ECP Area Type
Notes:									
AST		Aboveground storage tank				NAVSTA TI	Naval Station Treasure Island		
CAP		Corrective action plan				Navy	U.S. Department of the Navy		
CCSF		City and County of San Francisco				NFA	No further action		
EBS		Environmental baseline survey				OWS	Oil-water separator		
ECP		Environmental condition of property				RPM	Remedial project manager		
EFA West		Naval Facilities Engineering Command Engineering Field Activity West				SWDIV	U.S. Department of the Navy, Naval Facilities Engineering		
ERM-West		Environmental Resources Management West, Inc.					Command, Southwest Division		
ID		Identification				Tetra Tech	Tetra Tech EM Inc.		
mg/kg		Milligrams per kilogram				UST	Underground storage tank		
NA		Not applicable				Water Board	San Francisco Bay Regional Water Quality Control Board		

Notes on tank status:

"Closed" status indicates a belief by the Navy that a tank that had a release to the environment is "closed" pursuant to California Title 23.

"Never existed" status indicates a belief by the Navy that a tank was planned but was never installed (identified on drawings, but not confirmed on as-builts or other later investigations)

"No further action" status indicates a belief by the Navy that a tank was either a home heating oil tank or a tank where no release occurred.

"Previously suspected" status indicates a tank that the Navy previously believed existed, but more recent information indicates it never existed.

"Proposed NFA" status indicates the Navy has sent a report to the Water Board requesting No Further Action and is awaiting the Water Board's evaluation and concurrence.

"Removed" status indicates a tank was removed from the site.

"Suspected" status indicates a belief by the Navy that a tank is suspected to have existed but was removed previously or may have been abandoned.

"Suspected removed" status indicates a belief by the Navy that a tank that can't be found, but is identified somehow, and investigations to date are unable to locate that tank, therefore it is suspected removed.

"Unknown" status indicates uncertainty by the Navy as to whether a tank existed.

The rationale for assigning each UST's status is presented in greater detail in the "Final Facilitywide UST Summary Report Update", August 25 (Shaw 2004c).

TABLE 3: SUMMARY OF UNDERGROUND STORAGE TANKS, OIL/WATER SEPARATORS, AND ABOVEGROUND STORAGE TANKS (Continued)

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	ID	Material Stored/ Disposed	Capacity (gallons)	Tank Status	Regulatory Closure	Potential for Contamination Observed	Associated IR Site	Closure Document	ECP Area Type
References:									
CCSF 2000. Letter Regarding Notice of Completion UST Removal (Tank 469). From Sue Cone, Program Manager, Hazardous Materials Unified Program Agency and Jim Tang, Environmental Health Inspector, UST Closure Program. To Naval Facilities Engineering Command. July 7.									
ERM-West 1996a. "Final EBS Sampling Work Plan for NAVSTA TI." April 30.									
Laidlaw 1998b. Memo for cleaning AST, Treasure Island San Francisco, California. August 27, 1998.									
Navy. 1999. "Memorandum from Michael Mentink, Treasure Island CSO to Virginia St. Jean HMUPA, City and County of SF, Certification of AST Cleaning." October 4.									
Shaw. 2004c. "Final Facilitywide Underground Storage Tank Summary Report Update, Naval Station Treasure Island San Francisco, California." August 25.									
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 1997. Letter Regarding UST Case Closure (Tanks 8 [Qtr 8, QR08], 230, 257, 180D, 180E) NAVSTA TI, San Francisco, CA. From Richard McMurtry, Groundwater Protection and Waste Containment Division Chief, Water Board. To John Pfister, Navy, EFA WEST. October 3.									
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.									
Water Board 2003e. Letter Regarding Concurrence on Request for NFA, Suspected USTs, NAVSTA TI, San Francisco, California. (Tanks 3A, 3B, 368C, 450, 452, 453, 461, M, 7, 145, 180F, 180G, 267, FF8, 213, 262). From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. December 2.									
Water Board. 2004a. Letter Regarding Concurrence on Final Corrective Action Plan (CAP), Inactive Fuel Lines, NAVSTA TI, San Francisco. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. February 10.									
Water Board. 2004b. Letter Regarding Case Closure Letter for DoD USTs at NAVSTA TI including: UST 201 and UST 270. From Bruce H. Wolfe, Executive Officer, Water Board. To Ellen Casados, RPM, SWDIV. February 10.									
Water Board. 2004h. Letter Regarding Concurrence on Request for No Further Action, Site 15, NAVSTA TI, San Francisco. From Alan D. Friedman, Water Resource Control Engineer. To Ellen Casados, RPM, SWDIV. September.									
Water Board. 2004i. Letter Regarding Concurrence on Request for NFA, Site 227 (UST 227), NAVSTA TI, San Francisco. From Sarah Raker, Engineering Geologist, Water Board. To Ellen Casados, RPM, SWDIV. September 21.									
Water Board. 2005e. Letter Regarding Draft Closure Report Site 25 and Suspected Removed USTs 2B, 143A-143I, Request for No Further Action, NAVSTA TI, San Francisco. From Alan Friedman, Water Resource Control Engineer, Water Board. To Ellen Casados, RPM, SWDIV. November 12.									

TABLE 4: LEAD-BASED PAINT INFORMATION FOR NONRESIDENTIAL BUILDINGS CONSTRUCTED BEFORE 1978 WITHIN THE FOST AREA

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	Building	Year Built	Use	LBP Present	Document Addressing LBP	Status at Time of FOST
T001	146	1941	Gate/sentry house, office	Assumed	NA	No action required for closure
T001	447	1964	Bus stop shelter	Assumed	NA	No action required for closure
T002	183	1942	Yacht club (sailing club and storage), office, storage	Assumed	NA	No action required for closure
T002	298	1944	Loading shed, waiting station, boat house storage	Assumed	NA	No action required for closure
T002	469	1969	Standby generator building	Assumed	NA	No action required for closure
T003	1	1938	Administrative office, parking, photographic laboratory, telephone exchange communication control link, switching/substation, and museum/memorial; according to historical study, a printing office (1944-1960) and airport terminal for seaplanes(1938-1946)	Assumed	NA	No action required for closure
T006	2	1938	Hangar, armory, reserve training center, and combat vehicle maintenance shop, exhibits	Assumed	NA	No action required for closure
T006	114	1942	Reserve training (shops/storage), combat vehicle maintenance, garage	Assumed	NA	No action required for closure
T006	141	1943	Residential training building (vacant) USMCR storage, oil storage, explosives office, carpenter's shop and storage	Assumed	NA	No action required for closure
T006	143	1941	Hazardous/flammable storage, carpenter shop, gasoline pump house, hazardous material locker	Assumed	NA	No action required for closure
T006	343	1951	Hydraulic training school	Assumed	NA	No action required for closure
T006	346	1950	Operational shop, radio transmitting station instruction, radio transmitting station	Assumed	NA	No action required for closure

TABLE 4: LEAD-BASED PAINT INFORMATION FOR NONRESIDENTIAL BUILDINGS CONSTRUCTED BEFORE 1978 WITHIN THE FOST AREA (Continued)

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	Building	Year Built	Use	LBP Present	Document Addressing LBP	Status at Time of FOST
T006	347	1951	Gun mount	Assumed	NA	No action required for closure
T006	358	1953	Reserve training, resistor bank	Assumed	NA	No action required for closure
T006	384	1958	Reserve training, storage, combat vehicle maintenance	Assumed	NA	No action required for closure
T006	385	1944	Gun/skeet/trap storage	Assumed	NA	No action required for closure
T006	413	1950	Training material storage, communication training	Assumed	NA	No action required for closure
T006	448	1965	Reserve training, combat vehicle maintenance, truck service facility	Assumed	NA	No action required for closure
T006	454	1968	Ammunition storage	Assumed	NA	No action required for closure
T010	493	1974	Storm water pumping station	Assumed	NA	No action required for closure
T016	396	1944	Sump house	Assumed	NA	No action required for closure
T017	34	1942	Commissary store	Assumed	NA	No action required for closure
T018	91	1942	Toilets, self-serve laundry and storage	Assumed	NA	No action required for closure
T023	450	1968	Administrative office, employee parking, ticket office	Assumed	NA	No action required for closure
T024	395	1944	Sump house	Assumed	NA	No action required for closure
T027	140	1942	Commissioned officer's club, commissioned mess open	Assumed	NA	No action required for closure
T027	398	1944	Tennis courts	Assumed	NA	No action required for closure
T029	449	1966	Communication center, administrative and storage	Assumed	NA	No action required for closure
T029	481	1971	Incinerator	Assumed	NA	No action required for closure
T030	187	1943	Chapel	Assumed	NA	No action required for closure
T030	265	1944	Special service administrative, library, hostess house	Assumed	NA	No action required for closure

TABLE 4: LEAD-BASED PAINT INFORMATION FOR NONRESIDENTIAL BUILDINGS CONSTRUCTED BEFORE 1978 WITHIN THE FOST AREA (Continued)

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	Building	Year Built	Use	LBP Present	Document Addressing LBP	Status at Time of FOST
T030	271	1944	Community service center, officer's recreation	Assumed	NA	No action required for closure
T034	452	1969	Barracks	Assumed	NA	No action required for closure
T034	453	1970	Barracks, administrative office	Assumed	NA	No action required for closure
T049	258	1944	Post office, wives' club, bank, administrative	Assumed	NA	No action required for closure
T052	393	1944	Sewage pump station No. 6; According to the historical study, also used as a sump house	Assumed	NA	No action required for closure
T054	229	1944	Enlisted person's Club, E1-E3	Assumed	NA	No action required for closure
T062	261-A	1944	Bowling alley, vacant indoor swimming pool and skating rink	Assumed	NA	No action required for closure
T062	261-B	1944	Bowling alley, vacant indoor swimming pool and skating rink	Assumed	NA	No action required for closure
T063	401	1961	Theater	Assumed	NA	No action required for closure
T071	215	1944	Administrative (lab/pharmacy, storage, hobby shop, chapel, exchange, radio repair shop, carpenter shop, arts/crafts, training, misc. material storage, youth center)	Assumed	NA	No action required for closure
T072	216	1944	Assembly shed, vehicle storage	Assumed	NA	No action required for closure
T073	217	1944	Quarters, storage, administrative, family service center, Red Cross, applied instruction	Yes	--	No action required for closure
T080	377	1944	Sump house	Assumed	NA	No action required for closure
T082	497	1976	Weight/workout room	Assumed	NA	No action required for closure
T083	402	1961	Gymnasium, weight room, locker room	Assumed	NA	No action required for closure

TABLE 4: LEAD-BASED PAINT INFORMATION FOR NONRESIDENTIAL BUILDINGS CONSTRUCTED BEFORE 1978 WITHIN THE FOST AREA (Continued)

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	Building	Year Built	Use	LBP Present	Document Addressing LBP	Status at Time of FOST
T084	201	1944	Navy exchange store, MWR adventure shop, beauty salon, barber shop	Assumed	NA	No action required for closure
T085	202	1944	Navy exchange coin laundry, credit union, ATM	Assumed	NA	No action required for closure
T092	257	1944	Medical/dental clinic, childcare center, Red Cross, youth center, family services center (partially vacant); according to historical study a skeet range was at this site prior to construction	Assumed	NA	No action required for closure
T106	264	1944	Housing office, misc. storage, PWC shop, refrigerator storehouse	Assumed	NA	No action required for closure

Notes:

- EBS Environmental baseline survey
- FOST Finding of Suitability to Transfer
- LBP Lead-based paint
- NA Not applicable

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

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	Identification	Equipment Type	Equipment Status	Equipment Serial	Navy Number	Closure Document	ECP Area
T002	PCB 627362J88	Oil-filled transformer	Present	627362J88	Unknown	SULLIVAN/Tetra Tech 2004	3
T002	PCB EP-1	Pad	Present	NA	NA	SULLIVAN/Tetra Tech 2004	3
T002	PCB T-1030	Transformer	Removed	T-1030	T-1030	SULLIVAN/Tetra Tech 2004	1
T002	PCB T-1032	Transformer or switch	Removed	TX-1032	T-1032	SULLIVAN/Tetra Tech 2004	1
T002	PCB TX-143	Oil-filled pad-mounted transformer	Removed	21607	TX-143F	SULLIVAN/Tetra Tech 2004	1
T003	PCB 16601	Oil-filled transformer	Removed	16601	11-80	SULLIVAN/Tetra Tech 2004	1
T003	PCB 16603	Oil-filled switch	Removed	16603	8-80	SULLIVAN/Tetra Tech 2004	1
T003	PCB T-114A	Oil-filled switch	Present	11-80	T-114A	--	4
T003	PCB T-114B	Oil-filled switch	Present	8-80	T-114B	--	4
T003	PCB TX-140	Oil-filled transformer	Present	86V6741	TX-140	--	4
T003	PCB TX-2045	Oil-filled transformer	Present	Unknown	TX-2045	--	4
T006	PCB EP 6-1	pad	Present	EP 6-1	EP 6-1	SULLIVAN/Tetra Tech 2004	3
T006	PCB HL448	Hydraulic Lift	Removed	Unknown	NA	SULLIVAN/Tetra Tech 2004	1
T006	PCB T006A	Dry transformer	Not located	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T006	PCB T006B	Oil-filled transformer	Removed	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T006	PCB T006C	Dry transformer	Not located	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T006	PCB T006D	Dry transformer	Not located	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T006	PCB T-1128	Switch	Present	T-1128	T-1128	SULLIVAN/Tetra Tech 2004	1

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

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	Identification	Equipment Type	Equipment Status	Equipment Serial	Navy Number	Closure Document	ECP Area
T006	PCB T-1130	Switch	Present	T-1130	T-1130	SULLIVAN/Tetra Tech 2004	1
T006	PCB TX-116	Oil-filled transformer	Present	83JB879014	TX-116	SULLIVAN/Tetra Tech 2004	1
T006	PCB TX-117	Oil-filled transformer	Present	83JB878024	TX-117	SULLIVAN/Tetra Tech 2004	1
T010	PCB 5H-25	Switch	Present	NA	NA	SULLIVAN/Tetra Tech 2004	1
T010	PCB T010A	Transformer	Not located	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T010	PCB T010B	Oil-filled switch	Not located	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T010	PCB T-10	Switch	Present	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T010	PCB T-1088	Transformer or switch	Not located	T-1088	T-1088	SULLIVAN/Tetra Tech 2004	1
T010	PCB T-1100	Transformer or switch	Removed	7522885	T-1100	SULLIVAN/Tetra Tech 2004	1
T010	PCB T-1102	Switch	Present	7522902	T-1102	SULLIVAN/Tetra Tech 2004	3
T010	PCB T83F09704	Oil-filled switch	Present	T83F09704	Unknown	SULLIVAN/Tetra Tech 2004	1
T010	PCB TX-1	Oil-filled pole-mounted transformer	Present	H113083	TX-1	SULLIVAN/Tetra Tech 2004	3
T010	PCB TX-121	Oil-filled transformer	Present	83JB875057	TX-121	SULLIVAN/Tetra Tech 2004	3
T010	PCB TX-2033	Oil-filled pole-mounted transformer	Present	340801	TX-2033	SULLIVAN/Tetra Tech 2004	3
T015	PCB T015A	Oil-filled pole-mounted transformer	Not located	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T015	PCB T015B	Oil-filled pole-mounted transformer	Not located	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, Treasure Island

EBS Parcel	Identification	Equipment Type	Equipment Status	Equipment Serial	Navy Number	Closure Document	ECP Area
T015	PCB T015C	Oil-filled pole-mounted transformer	Not located	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T015	PCB T015D	Oil-filled pole-mounted transformer	Not located	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T015	PCB TX-172	Oil-filled pad-mounted transformer	Present	372501001	TX-172	SULLIVAN/Tetra Tech 2004	3
T015	PCB TX-32	Oil-filled pole-mounted transformer	Not located	N300514YFTA	TX-32	SULLIVAN/Tetra Tech 2004	1
T015	PCB TX-33(2)+	Oil-filled transformer	Not located	N300516YFTA	TX-33(2)	SULLIVAN/Tetra Tech 2004	1
T015	PCB TX-34	Oil-filled pole-mounted transformer	Removed	N305972YFTA	TX-34	SULLIVAN/Tetra Tech 2004	1
T018	PCB TX-106	Oil-filled transformer	Present	85JF452104	TX-106	SULLIVAN/Tetra Tech 2004	1
T023	PCB 16756	Oil-filled pad-mounted transformer	Removed	16756	Unknown	SULLIVAN/Tetra Tech 2004	1
T023	PCB CY A	Transformer	Not Located	CY A	Unknown	SULLIVAN/Tetra Tech 2004	1
T023	PCB TX-146	Oil-filled pad-mounted transformer	Present	86V6742	TX-146	--	4
T026	PCB 11-80B0	Switch	Present	11-80B0	11-80B0	SULLIVAN/Tetra Tech 2004	3
T026	PCB 876011266	Oil-filled transformer	Present	876011266	Unknown	SULLIVAN/Tetra Tech 2004	3
T026	PCB 8-80A0	Switch	Present	8-80A	8-80A0	SULLIVAN/Tetra Tech 2004	1
T026	PCB 8-80C0	Switch	Present	8-80C	8-80C0	SULLIVAN/Tetra Tech 2004	1
T026	PCB TX-145	Oil-filled transformer	Not located	80JE224264	TX-145	SULLIVAN/Tetra Tech 2004	1
T029	PCB T-1034	Switch	Present	SW1355	T-1034/FC-42-S A	SULLIVAN/Tetra Tech 2004	1

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

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	Identification	Equipment Type	Equipment Status	Equipment Serial	Navy Number	Closure Document	ECP Area
T029	PCB T-1038	Switch	Present	Unknown	T-1038	SULLIVAN/Tetra Tech 2004	1
T029	PCB T-1040	Switch	Present	Unknown	T-1040	SULLIVAN/Tetra Tech 2004	1
T029	PCB TX-169	Oil-filled pad-mounted transformer	Present	86V6721	TX-169	SULLIVAN/Tetra Tech 2004	3
T029	PCB TX-2006	Oil-filled transformer	Present	627381J88	TX-2006	SULLIVAN/Tetra Tech 2004	3
T033	PCB T-287	Pole-mounted transformer	Present	108602	T-287	SULLIVAN/Tetra Tech 2004	1
T034	PCB TX-138	Oil-filled transformer	Present	86V6743	TX-138	--	4
T034	PCB TX-139	Oil-filled transformer	Present	86V6744	TX-139	--	4
T034	PCB W239775	Oil-filled transformer	Removed	W239775	Unknown	SULLIVAN/Tetra Tech 2004	1
T034	PCB YCR94011	Oil-filled transformer	Removed	YCR94011	Unknown	SULLIVAN/Tetra Tech 2004	1
T039	PCB EP 39-1	pad	Present	EP 39-1	EP 39-1	SULLIVAN/Tetra Tech 2004	3
T039	PCB TX-112A	Oil-filled transformer	Removed	762014503	TX-112A	SULLIVAN/Tetra Tech 2004	1
T039	PCB TX-112B	Oil-filled transformer	Removed	762015732	TX-112B	SULLIVAN/Tetra Tech 2004	1
T039	PCB TX-112C	Oil-filled transformer	Removed	762015739	TX-112C	SULLIVAN/Tetra Tech 2004	1
T052	PCB TX-10	Oil-filled transformer	Removed	83A160694	TX-10	SULLIVAN/Tetra Tech 2004	1
T052	PCB TX-11	Oil-filled transformer	Removed	81A123304	TX-11	SULLIVAN/Tetra Tech 2004	1
T052	PCB TX-9	Oil-filled pole-mounted transformer	Present	82A191818/131 2047TCPI	TX-9/T-145	SULLIVAN/Tetra Tech 2004	1
T053	PCB TX-130	Oil-filled transformer	Present	83JBB877022	TX-130	SULLIVAN/Tetra Tech 2004	3

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

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	Identification	Equipment Type	Equipment Status	Equipment Serial	Navy Number	Closure Document	ECP Area
T061	PCB TX-129	Oil-filled pad-mounted transformer	Removed	83JB877067	TX-129	SULLIVAN/Tetra Tech 2004	3
T073	PCB TX-43	Oil-filled pole-mounted transformer	Present	85A311742	TX-43	SULLIVAN/Tetra Tech 2004	1
T077	PCB TX-21	Oil-filled pole-mounted transformer	Present	83A162621A	TX-21	SULLIVAN/Tetra Tech 2004	1
T077	PCB TX-22	Oil-filled pole-mounted transformer	Present	83A170190B	TX-22	SULLIVAN/Tetra Tech 2004	1
T077	PCB TX-23	Oil-filled pole-mounted transformer	Present	83A170191C	TX-23	SULLIVAN/Tetra Tech 2004	1
T078	PCB TX-2002	Oil-filled transformer	Present	90A39431	TX-2002	SULLIVAN/Tetra Tech 2004	1
T079	PCB EP 79-1	Pad	Present	NA		SULLIVAN/Tetra Tech 2004	3
T079	PCB T079A	Oil-filled transformer	Removed	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T079	PCB T079B	Oil-filled transformer	Removed	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T079	PCB T079C	Oil-filled transformer	Not located	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T079	PCB T079D	Oil-filled transformer	Not located	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T079	PCB TX-113	Oil-filled pad-mounted transformer	Present	PCB6405-0101	TX-113	SULLIVAN/Tetra Tech 2004	1
T079	PCB TX-2034	Oil-filled pole-mounted transformer	Present	83A162083	TX-2034	SULLIVAN/Tetra Tech 2004	1
T080	PCB 29-5/87-189538	Dry transformer	Removed	29-5/87-189538	Unknown	SULLIVAN/Tetra Tech 2004	1
T080	PCB EP 80-1	Pad	Present	NA		SULLIVAN/Tetra Tech 2004	3
T080	PCB T080	Dry transformer	Not Located	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, Treasure Island

EBS Parcel	Identification	Equipment Type	Equipment Status	Equipment Serial	Navy Number	Closure Document	ECP Area
T080	PCB TX-173	Oil-filled pad-mounted transformer	Present	8751160	TX-173	SULLIVAN/Tetra Tech 2004	1
T081	PCB TX-126	Oil-filled pad-mounted transformer	Present	83JA861079	TX-126	SULLIVAN/Tetra Tech 2004	1
T081	PCB TX-127	Oil-filled pad-mounted transformer	Present	83JB878012	TX-127	--	4
T081	PCB TX-36	Oil-filled pole-mounted transformer	Not located	83A162622	TX-36	SULLIVAN/Tetra Tech 2004	1
T081	PCB TX-37	Oil-filled pole-mounted transformer	Not located	82A201014	TX-37	SULLIVAN/Tetra Tech 2004	1
T084	PCB TX-128	Oil-filled pad-mounted transformer	Present	83JB877085	TX-128	SULLIVAN/Tetra Tech 2004	3
T086	PCB TX-15	Oil-filled pole-mounted transformer	Removed	83A162619	TX-15	SULLIVAN/Tetra Tech 2004	1
T086	PCB TX-16	Oil-filled pole-mounted transformer	Removed	83A162620	TX-16	SULLIVAN/Tetra Tech 2004	1
T086	PCB TX-17	Oil-filled pole-mounted transformer	Removed	83A170193	TX-17	SULLIVAN/Tetra Tech 2004	1
T086	PCB TX-2038	Oil-filled pole-mounted transformer	Present	72390-2	TX-2038	SULLIVAN/Tetra Tech 2004	1
T091	PCB EP 91-1	Pad	Present	NA		SULLIVAN/Tetra Tech 2004	3
T091	PCB EY	Dry transformer	Removed	EY	Unknown	SULLIVAN/Tetra Tech 2004	1
T091	PCB TX-142	Oil-filled pad-mounted transformer	Removed	85V6799	TX-142	SULLIVAN/Tetra Tech 2004	1
T091	PCB TX-147	Oil-filled transformer	Present	83JB877015	TX-147	--	4
T092	PCB TX-148	Oil-filled pad-mounted transformer	Removed	83JA362005	TX-148 (1)	SULLIVAN/Tetra Tech 2004	1
T092	PCB TX-168	Oil-filled pad-mounted transformer	Removed	P006163	TX-168	SULLIVAN/Tetra Tech 2004	3

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

Final, Finding of Suitability to Transfer, Treasure Island

EBS Parcel	Identification	Equipment Type	Equipment Status	Equipment Serial	Navy Number	Closure Document	ECP Area
T093	PCB T093	Oil-filled transformer	Present	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	3
T093	PCB TX-27	Oil-filled pole-mounted transformer	Present	80A451904	TX-27	SULLIVAN/Tetra Tech 2004	1
T093	PCB TX-28A	Oil-filled pole-mounted transformer	Present	80A453604	TX-28	SULLIVAN/Tetra Tech 2004	1
T093	PCB TX-29	Oil-filled pole-mounted transformer	Present	80A451905C	TX-29	SULLIVAN/Tetra Tech 2004	1
T106	PCB TX-18	Oil-filled pole-mounted transformer	Not located	83A170925	TX-18	SULLIVAN/Tetra Tech 2004	1
T106	PCB TX-19	Oil-filled pole-mounted transformer	Not located	83A170926	TX-19	SULLIVAN/Tetra Tech 2004	1
T106	PCB TX-20	Oil-filled pole-mounted transformer	Not located	83A170927	TX-20	SULLIVAN/Tetra Tech 2004	1
T120	PCB T120A	Dry transformer	Present	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T120	PCB T120B	Dry transformer	Present	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T120	PCB T120C	Dry transformer	Present	Unknown	Unknown	SULLIVAN/Tetra Tech 2004	1
T120	PCB TX-2001	Oil-filled pad-mounted transformer	Present	89-51525	TX-2001	SULLIVAN/Tetra Tech 2004	1

Notes:

-- Not closed at the time of the FOST
 EBS Environmental baseline survey
 ECP Environmental condition of property
 Navy U.S. Department of the Navy
 PCB Polychlorinated biphenyl
 PWC Navy Public Works Center
 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.

TABLE 6: SUMMARY OF HAZARDOUS SUBSTANCES STORED, RELEASED, OR DISPOSED OF
 Final, Finding of Suitability for Transfer, Treasure Island

Location	Substances	CAS Number	Regulatory Synonym	RCRA Waste	Reportable Quantity (kg)	Quantity	Units	S/R/D	Action Taken
T015	Corrosives	NA	Unknown	Unknown	NA	150	pounds	S	None

Notes:

- CAS Chemical Abstract System
- kg Kilograms
- NA Not applicable
- RCRA Resource Conservation and Recovery Act
- S/R/D Stored, released, or disposed of

APPENDIX A
RESPONSE TO COMMENTS

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

This document presents the Navy's responses to comments from the regulatory agencies, members of the Naval Station Treasure Island (NAVSTA TI) Restoration Advisory Board (RAB), and community members on the "Revised Draft Finding of Suitability to Transfer (FOST) for Property on Treasure Island, Naval Station Treasure Island, San Francisco, California," dated July 11, 2005. The comments addressed below were received from U.S. Environmental Protection Agency (EPA) on August 16, 2005; the California Environmental Protection Agency (Cal EPA) Department of Toxic Substances Control (DTSC) on August 9, 2005; the Cal EPA San Francisco Bay Regional Water Quality Control Board (Water Board) on August 8, 2005; and the City and County of San Francisco (City) (on behalf of the Treasure Island Development Authority [TIDA]) on August 17, 2005. Additionally, comments were received from Ms. Dale Smith (RAB Member) on August 15, 2005; Mr. Emeric Kalman (community member) on August 12, 2005; Mr. Nathan Brennan (RAB member) on August 16, 2005; and Mr. Douglas Ryan (RAB member) on August 16, 2005.

On September 1, 2005, the Navy submitted responses to comments from the regulatory agencies, members of the RAB, and community members on the "Revised Draft FFOST for Property on Treasure Island, NAVSTA TI, San Francisco, California," dated July 11, 2005. On September 7, 2005, the Navy met with the EPA; the DTSC; and the TIDA. At the meeting, the EPA and DTSC requested further discussions regarding comments regarding polychlorinated biphenyls (PCB) and lead-based paint. On September 15, 2005, the Navy met with the DTSC and to further discuss the resolution of those comments. As a direct result of those discussions several responses to comments (RTC) addressing PCBs and LBP have been revised. Further comments received from Geomatrix on behalf of TIDA were received December 5, 2005, and were discussed at the December 7, 2005 BCT meeting these responses are included.

RESPONSES TO COMMENTS FROM ENVIRONMENTAL PROTECTION AGENCY

Specific Comments

- Comment:** **Section 5.0 Environmental Condition of Property Area Type, page 19 and Figure 2: The figure includes parcels of Types 3 and 4. It is not clear in the draft text why these parcels are in these categories. Please clarify.**

Response: The rationale for the assignment of environmental condition of property (ECP) types to those portions of environmental baseline survey (EBS) parcels that lie within the transfer parcels is provided in the final supplemental EBS (SEBS) ([SulTech 2005](#)). For clarity, the last paragraph of [Section 5.0](#) of the FOST has been revised as follows:

“All EBS parcels identified in this FOST are wholly or partially contained within the FOST areas and the portion of the EBS parcel in the FOST area have been classified as ECP Area Types 1, 2, 3, or 4 as discussed in the supplemental EBS ([SulTech 2005p](#)). EBS parcels assigned ECP Area Type 2 are the result of petroleum releases, and EBS parcels assigned ECP Area Types 3 and 4 are principally the result of PCB detections in transformer vaults. The ECP area type for each EBS parcel is presented in [Table 1](#) and shown on [Figure 2](#).”

2. **Comment:** **Section 6.1.1 Asbestos-containing Material, pages 20 - 22: The description is not clear. If all buildings were identified, characterized and abated as required, why is there reference to conveying property "as-is"? That sounds like the work hasn't been done. If all the work has been completed, then most of the language in this section is not necessary and adds confusion for the reader.**

The total count of buildings in Table 2 isn't reflected in the text discussing the number of buildings and various outcomes. The text and table do not provide information about whether all buildings were identified, characterized and abated as required. There are references in the table to the asbestos document, but no explanation about what that is. Please clarify whether all work regarding asbestos has been done or not, and explain in simple terms.

Response: The reference to “as is,” is included as part of the discussion of DoD policy relating to asbestos-containing material (ACM) on Base Realignment and Closure (BRAC) properties. This discussion is included to provide the reader with background relating to Department of Defense’s (DoD) obligations for property transfer. The second paragraph of [Section 6.1.1](#) discusses the fact that property will be conveyed “as is” unless it is determined by competent authority that ACM poses a threat to human health at the time of transfer. For the FOST transfer parcel, no ACM has been found to pose a threat to human health based on the results of the surveys and remediation done before the execution of the FOST as discussed in [Section 6.1.1](#).

The text has been revised for clarity as follows:

“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 Section 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).

Beginning in 1995, several surveys to identify the presence of ACM have been completed at NAVSTA TI. The Navy conducted an asbestos survey of 108 major nonresidential buildings at NAVSTA TI and compiled the results in an asbestos survey report in 1995 (MINS 1995k). In 1997, Radian, Inc. completed a more comprehensive asbestos survey for a total of 212 nonresidential buildings, including an inspection of the 108 buildings previously surveyed to estimate scope and costs for abating damaged, friable asbestos (Radian, Inc. 1997g, 1997j). In 1998, Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment, Vallejo (SSPORTS) performed an asbestos survey of underground steam utility lines and miscellaneous facilities (SSPORTS 1998p). Table 2 lists the buildings within the TI FOST parcel that were surveyed for ACM and indicates where remedies were implemented. Results of the underground steam utility line survey identified a single instance where ACM-wrapped pipes exist within the TI Core Transfer Parcel (SSPORTS 1998p).

Friable, accessible ACM identified during surveys was remediated beginning with 38 buildings in 1998 by Allied Technology Group, Inc. (ATG) (ATG 1998b, 1998d). ATG remediated an additional 20 buildings in 1998 (ATG 1998i). In 1999, SSSPORTS remediated friable ACM found in residences at both YBI and TI (SSSPORTS 1999g). In 2002, Mendalian Construction, Inc. covered the crawlspaces, posted ACM signs to seven barracks on TI, and abated and removed ACM from six quarters on YBI (Mendalian Construction, Inc. 2002i). All known damaged, friable, or accessible ACM has been abated within the FOST area, and remaining ACM does not pose a threat to human health.

Notices and restrictions related to asbestos are identified in [Sections 8.1.2 and 8.2.7.](#)”

3. **Comment:** **Sections 6.1.2 and 6.1.3 Underground Storage Tanks and Petroleum Program pages 22 and 23: For completeness, suggest adding language concerning CERCLA chemicals and these two programs. If the characterization activities included the identification of CERCLA chemicals, such that any parcels with CERCLA chemicals were moved out of the UST or petroleum side of the work to the CERCLA program, then explain that. Since there is often confusion about what the petroleum exclusion from CERCLA is, a brief discussion would clear up the issue for the reader.**

Response: [Section 6.1.32](#) of the FOST has been revised to clarify Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) constituents are investigated as appropriate to past site uses, as follows:

“CERCLA constituents if expected were included in the investigations and addressed in closure reports. Specifically, petroleum Site 15 was sampled for polycyclic aromatic hydrocarbons (PAH); the Building 530 Pipeline was sampled for PAHs and volatile organic compounds (VOC); the Causeway Pipeline was sampled for PAHs, VOCs, and lead; Site D1B was sampled for PAHs and VOCs; and Site 25 was sampled for VOCs. At each of these sites, the appropriate regulatory agencies concluded that no further action was necessary to address the CERCLA constituents at the site.”

4. Comment: **Page 23 last paragraph of Section 6.1.3: Explain the relationship between the potential pathways of contamination and the FOST parcels. This is an important point that needs to be clear.**

Response: [Section 6.1.32](#) of the FOST has been revised as follows:

“Groundwater and storm and sanitary sewers potentially provide pathways for contaminant migration from non-FOST parcels where releases have occurred to FOST areas.”

5. Comment: **Section 6.1.6 Polychlorinated Biphenyls Page 25 - 26: This section is not clear. Releases of PCBs are handled as any other CERCLA chemical. There is no provision to postpone action. Please clarify.**

Response: The Navy will address PCBs pursuant to the appropriate self implementing cleanup guidelines under TSCA, which may include encapsulation of PCB sites located within occupied buildings prior to property transfer.

RESPONSES TO COMMENTS FROM DEPARTMENT OF TOXIC SUBSTANCES CONTROL

General Comments

1. **Comment:** Based on our review of the FOST, DTSC believes that the known release of Polychlorinated Biphenyls (PCBs) to soil, at the transformer location identified as TX-120 and located on Parcel T010 within the Southeast Transfer Parcel, must be remediated prior to a determination that the parcel is suitable for transfer.

Response: The Navy has elected to remove the transformer location, known as TX-120 from the FOST area, and to provide a 50-foot buffer surrounding the pad, as shown on revised [Figures 2, 3, 4, and 6](#), until such time as the area is remediated.

2. **Comment:** DTSC also requires that lead contamination and PCBs 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: The Navy has added the following restriction for buildings with lead-based paint to [Section 8.2.4](#) of the FOST:

“For non-residential buildings, the transferee agrees to restrict uses of buildings to non-residential use until the building is demolished. If the building or land is to be used or developed for residential use, the constituents driving risk, namely lead-based paint on surfaces or in soils, must be remedied, if necessary, and the remedy must be demonstrated to present no risk 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 the DTSC a covenant providing the DTSC with enforcement authority. Should a future transferee desire to release these restrictions, they would be obliged to separately remediate lead-based paint or PCBs on surfaces or in soils and petition both the Navy and the DTSC independently to obtain a release of the restriction from each party.”

The Navy has added the following covenant for PCBs inside of buildings to [Section 8.2.8](#) of the FOST:

“PCBs have been detected at elevated concentrations in several locations within the FOST parcels. The following table presents the current or former location of the transformer, the associated transformer identification number, and the maximum concentration reported in

samples from the area adjacent to the transformer locations. The Navy will address the currently occupied sites pursuant to TSCA and based on agreements with DTSC prior to transfer by deed. The deed will contain appropriate notices and covenants restricting use and access and requiring the transferee to maintain the selected remedy of PCB sites as appropriate. For vaults in buildings, if PCBs are present at concentrations exceeding TSCA criteria, access to the vaults will be restricted to authorized personnel with appropriate levels of personal protective equipment. Any modifications to the vault must comply with all regulations regarding PCBs as appropriate. Unoccupied buildings with elevated concentrations of PCBs in transformer vaults will be restricted from use until the building is demolished; or if reuse is to occur, until the PCBs have been addressed by the transferee.”

In a meeting with the BRAC Cleanup Team (BCT) on September 7, 2005, to discuss the Navy’s proposed resolution to these comments, the TIDA representative commented on this response as it relates to lead-based paint. TIDA requested that lead-based paint restrictions and notices be removed from the FOST and be replaced with some general discussion on the need for additional lead-based paint actions if the property is used for residential purposes in the future. The Navy has determined that lead-based paint notices and restrictions are necessary in the deed and that no viable alternative to these deed notices and restrictions is available at this time.

Additional Comments

3. **Comment:** **At the September 15, 2005 Issue Resolution meeting held with Navy management, DTSC and EPA management, DTSC offered an additional comment to be included. The DTSC commented that concurrence on the Final TI FOST will be contingent upon completion of the Final Historical Radiological Assessment prior to transfer.**

Response: Comment noted. At this time, the Navy does not anticipate any radiological issues associated with the FOST areas; however, if areas within the FOST parcels are determined to be impacted by radiological issues, the FOST parcels would be amended prior to transfer.

RESPONSES TO COMMENTS FROM THE REGIONAL WATER QUALITY CONTROL BOARD

General Comments

- Comment:** The list of sites proposed for deed notices may be incomplete. We concur with the inclusion of the five sites listed above [14/22, 25, D1B, F2A/F2B and D5], but request that a notice also be given for the shallow soil at site F2B, as we did not concur with the request for No Further Action (NFA). We also have not yet reviewed the Site 25 closure documents, and we might require notice for its shallow soil as well. We also request that the list be expanded to include all petroleum sites containing petroleum substances above unrestricted use criteria within the FOST footprint. While we have issued NFA for the soil at several UST and former pipeline sites, we want to know which ones still have residual petroleum that will impact future reuse and redevelopment. For instance, it appears that sites D2A, D4B, Building 530 and the causeway pipeline may have residual TPH that could affect reuse within the FOST footprint.

Response: The text of the FOST has been revised to reflect the removal of Parcels T074 and T076, which includes petroleum Site 14/22 from the TI FOST parcel.

[Section 8.1.5](#) of the FOST has been revised as follows:

“The deed will contain a notice stating that residual petroleum contamination has been left in place within the FOST area at the following petroleum sites that have received NFA [no further action] concurrence: shallow and deep soils at CAP Sites 15 and 25; deep soil (5.5 feet or more bgs) at Inactive Fuel Line Site F2B; shallow and deep soil at Inactive Fuel Line Site D5 and shallow soil (above 7 feet bgs) at the Causeway Pipeline Site (see [Figure 6](#)). The division between shallow soil and deep soil is intended to coincide with the top of the zone of water table fluctuation.

Residual petroleum contamination has been left in place within the FOST area at the following petroleum site that has not received NFA concurrence: shallow and deep soils at Inactive Fuel Line Site D1B (see [Figure 6](#)).”

A notice is not required in the TI FOST for Inactive Fuel Line Sites D2A and D4B, the Building 530 Pipeline Site, and other UST sites within the FOST area because no residual TPH concentrations above unrestricted use criteria have been left in place in the portion of the FOST area.

The notice for Inactive Fuel Line Site F2A has been removed because the site is not located within the FOST area.

A notice is not required for shallow soil (above 5.5 feet bgs) at Inactive Fuel Line Site F2B in the southeastern corner of Building 258 because risk associated with soil beneath the paved area is considered minimal, and results of step-out sampling indicated concentrations of TPH below criteria.

2. **Comment:** **We do not concur with the proposed petroleum restrictions. We request a clarification of what regulatory closure is required to lift the restriction against soil disturbances at Sites 14/22, 25, F2A/F2B and D1B. We have already concurred with NFA for portions of these sites. We also do not agree with a distinction being drawn between the restriction proposed for Site 15 and the other four sites. All petroleum sites with residual petroleum above unrestricted use levels, in the FOST footprint, should be subject to a Water Board approved soil management plan.**

Response: The text of the FOST has been revised to reflect the removal of Parcels T074 and T076, which includes petroleum Site 14/22 from the TI FOST parcel.

Restrictions in place at petroleum sites that have not received a NFA concurrence letter from the Water Board will either be removed from the deed or modified depending on the conditions required in the closure report and the Water Board NFA concurrence letter at the time the response actions have been completed. Regulatory closure at a petroleum site is defined as the receipt of a NFA concurrence letter from the Water Board based on the closure report. Restrictions have been placed on sites prior to NFA concurrence to ensure that the Navy has retained sufficient property right's to access and perform remedial activities at the sites as may be required to achieve regulatory closure.

A requirement for a soil management plan is considered a restriction; therefore, sites requiring soil management plans are listed under restrictions.

The restriction for Inactive Fuel Line Site F2A will be removed because the site is not located within the FOST area.

The restrictions in [Section 8.2.5](#) have been divided into two subsections, [Section 8.2.5.1](#) (Sites That Have Not Received NFA Concurrence) and [Section 8.2.5.2](#) (Sites That Have Received NFA Concurrence). [Section 8.2.5.1](#) has been revised as follows:

“During the period from property transfer until regulatory closure and until the restriction is no longer necessary, unless specifically approved by the Navy on a case-by-case basis, no activities that will disturb the soil at 6 inches or more below current ground surface (such as excavation, grading, removal, trenching, filling, earth movement, or mining) shall be permitted within Inactive Fuel Line Site D1B, as shown on [Figure 6](#). The

deed will contain a covenant by the GRANTEE on behalf of itself, its successors, and assigns that prohibits any excavation, grading, removal, trenching, filling, earth movement, mining or other disturbance of the soil at or below 6 inches of the current ground surface of these sites without advanced written approval by the Navy. The deed may also contain a notice that the GRANTOR will 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 the soil at or below 6 inches of the current ground surface of these sites is no longer necessary, and the Navy agrees.”

Section 8.2.5.2 has been revised as follows:

“The deed will contain a covenant by the Grantee on behalf of itself, its successors, and assigns that no activities within the FOST areas that will disturb the soil at or above or below the specified depth below current ground surface (such as excavation, grading, removal, trenching, filling, earth movement, or mining) shall be permitted within CAP Sites 15 and 25, Inactive Fuel Line Sites F2B and D5, and the Causeway Pipeline Site without a Water Board-approved soil management plan for the following areas shown on Figure 6:

- Shallow and deep soils at CAP Site 15
- Shallow and deep soils at CAP Site 25
- Deep soil at 5.5 feet bgs and deeper at Inactive Fuel Line Site F2B
- Shallow and deep soils at Inactive Fuel Line Site D5
- Shallow soil (above 7 feet bgs) at the Causeway Pipeline Site.”

3. **Comment:** We concur with the proposed groundwater use restriction, but note that we have not granted NFA for the groundwater at Site D1B, nor have we determined whether one is justified for Site 25. Thus groundwater monitoring may still be required in one or both areas.

Response: Comment noted.

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

General Comments

1. **Comment:** Utilities. The document should clarify that utilities within the FOST parcels will be transferred via a bill of sale, not via the FOST.

Response: The FOST is not a property transfer document, rather it is used to document that parcels of land, including improvements (such as utilities), are suitable for transfer. Utilities could either be transferred by deed or by bill of sale, and specifying the mechanism is inappropriate for this FOST given the absence of an executed agreement governing the transfer.

2. **Comment:** Section 8.1.3, Notices Relevant to Lead-Based Paint (LBP). The second paragraph (beginning with “Demolition of nonresidential buildings...” contains information about potential future actions that may be required by regulatory agencies; however, this paragraph is not a notice in and of itself. To clarify, we request that the following words be inserted at the beginning of the paragraph: “With respect to notices, demolition of nonresidential building...” We also request that the paragraph be removed from the in-text table in Section 8.3, which is intended to summarize the actual notices.

Response: Section 8.1.3 has been revised as suggested. The in-text table in Section 8.3 was significantly revised to replace the in-text restatement of notices and restrictions with checkmarks indicating if notices or restrictions are necessary for individual issues. With the revisions to the table, the paragraph in Section 8.1.3 will no longer appear in Section 8.3.

3. **Comment:** Section 8.2.6, Groundwater Use Restriction. The first sentence indicates that the deed will contain a covenant prohibiting the Grantee from disturbing existing wells unless specifically approved by the Navy. We request that the Navy commit to review and respond to such requests in a reasonable time-frame (within several days). Additionally, the document should clarify that it is the Navy’s responsibility to destroy all existing wells. We request that the single currently inactive well (Parcel T001, Figure 4) be destroyed before transfer if it is no longer needed.

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 for this document to indicate well disturbance requests will be reviewed within a specified time or to specify whose responsibility it is to destroy existing wells in the future.

The request for the destruction of the inactive well shown on [Figure 4](#) in Parcel T001 has been noted. The Navy has determined the well is no longer needed and will pursue proper abandonment.

4. **Comment:** Section 8.2.8, Polychlorinated Biphenyl (PCB) Restrictions. The second paragraph describes restrictions pertaining to transformer TX-120 located on parcel T010. The paragraph should clarify that the Navy will be conducting the removal actions and obtaining regulatory closure. The FOST comments prepared by the California Department of Toxic Substances Control (DTSC), dated August 9, 2005, indicate that there is no known release of PCBs—a hazardous substance pursuant to the Comprehensive Response, Compensation and Liability Act (CERCLA)—to soil at the transformer location identified as TX-120 and located on Parcel T010 within the Southeast Transfer Parcel. DTSC states in its comments that TX-120 must be remediated prior to a determination that the parcel is suitable for transfer. We concur with DTSC’s conclusions regarding the release of PCBs to soils at TX-120, and believe the property is therefore not yet suitable for transfer, and that the Navy is not currently in a position to issue a warranty pursuant to CERCLA Section 120(h) for the soils at TX-120. 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 pursuant to CERCLA.

Also, the area requiring the restriction is not shown on Figure 6, as the text implies. We request that the restricted area be clearly delineated with an inset figure on Figure 6 or a separate figure.

Response: The transformer location identified as TX-120 in Parcel T010 within the Southeast Transfer Parcel has been removed from the FOST area, along with a buffer of 50 feet surrounding the concrete pad. [Figure 6](#) has been revised to show this area in an inset, as suggested.

5. **Comment:** Notice of Release.

Comment 5.1 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 8.2.8 pertaining to PCB restrictions). 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.”

- Response:** 5.1 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. Therefore, [Sections 8.1.2 and 8.2.8](#) have not been revised as requested.
- Comment:** 5.2. **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. 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....”**
- Response:** 5.2. 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 negotiation.
- Comment** 5.3. **We also note that the last paragraph in Section 8.2.8 should be included in Section 8.1.6 because it is a notice (not a restriction).**
- Response:** 5.3. The last paragraph of Section 8.2.8 has been moved to [Section 8.1.6](#), as suggested.
- Comment** 5.4 **Finally, we request that the same notice about a Notice of Release be included in Section 8.1.3 (Lead-Based Paint Notices) and Section 8.1.5 (Residual Petroleum Contamination Notices). The in-text table in Section 8.3 should be revised to reflect all of these changes.**
- Response:** 5.4. Parallel language about Notices of Releases has not been included in [Section 8.1.3](#) or [8.1.5](#), as requested. Such language has not been included because it is not relevant to the purpose of the FOST, which is to make a finding that the property is environmentally suitable for transfer by deed for the intended purpose. Issues such as this are appropriately addressed during the real estate transfer process.
6. **Comment:** **Section 8.2.5, Petroleum Restrictions, second paragraph. We have several comments pertaining to this paragraph. We have reviewed the August 8, 2005 Regional Water Quality Control Board (Water Board) FOST comments and believe they must be satisfactorily resolved prior to transfer. Again, it would place the Authority in an untenable position for the Navy to offer parcels to the Authority if the Water Board is on record with opposition to the petroleum restrictions in the FOST**

Response: Comment noted. Please see response to Water Board Comment 2.

7. Comment: **Petroleum Sites that Have Not Yet Received Regulatory Closure**

It appears that the proposed deed covenant applicable to petroleum sites that have yet to receive regulatory closure 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. Please verify that a site is considered to be “closed” when a regulatory agency has concurred with No Further Action (NFA; NFA terminology is used elsewhere in the document, e.g., Section 6.1.3). The document appears to use the terms “closure” and “NFA” interchangeably. To the extent that petroleum sites have received NFA, no restrictions should be required, and appropriate soil management requirements could apply in the event that petroleum residuals in excess of unrestricted use levels are encountered, as further discussed below in this comment.

Response: Please see response to Water Board Comment 2. Restrictions may no longer be necessary when regulatory closure has been obtained. Restrictions are necessary at the time of regulatory closure at sites where residual petroleum contamination has been left in place; however, until such time as the Navy has received an NFA concurrence from the Water Board, the final condition of the sites and whether or not restrictions are required is not known. Therefore, as noted in Water Board Comment 2, “restrictions have been placed on sites prior to NFA concurrence to ensure that the Navy has retained sufficient property rights to access and perform remedial activities at the sites as may be required to achieve regulatory closure.”

8. Comment: **It is unclear why a restriction prohibiting the disturbance of soil below 6 inches is proposed for petroleum sites that have not yet received regulatory closure. According to Section 8.1.5, soil with elevated concentrations of petroleum hydrocarbons remains in place at depths of 6 feet or greater. We request (1) there be no restriction on disturbing soil within 5 feet of the ground surface and (2) there be a mechanism to allow for disturbing soil below 5 feet, if such disturbance is necessary before the restriction is removed (e.g., utility repair).**

Response: As noted in Water Board Comment 2, “restrictions have been placed on sites prior to NFA concurrence to ensure that the Navy has retained sufficient property rights to access and perform remedial activities at the sites as may be required to achieve regulatory closure.” These restrictions are intended to be conservative and retain sufficient property rights to allow for final restrictions that are more protective than current known conditions would require. At such time as the Navy receives an NFA concurrence from the Water Board, final restrictions would be modified based on known conditions at the time of site closeout.

9. **Comment:** Site 14/22 should not be included in this paragraph because it has received regulatory concurrence with NFA and, therefore, should require no restriction.

Response: The text of the FOST has been revised to reflect the removal of Parcels T074 and T076, which includes petroleum Site 14/22 from the TI FOST parcel.

10. **Comment:** **Petroleum Sites that Have Received Regulatory Closure**

We do not believe that the proposed restrictions are appropriate for petroleum sites that have received NFA/regulatory closure; neither do we believe these restrictions are necessary to satisfy the Water Board. At most, a soil management plan (SMP) could be developed and approved by the Water Board that requires soils that contain petroleum residuals in excess of unrestricted use levels to be managed in accordance with that SMP.

Response: A soil management plan is considered a restriction. Shallow soils at petroleum CAP Sites 15 and 25, Inactive Fuel Line Site D5, and the Causeway Pipeline Site will require a Water Board-approved soil management plan for excavations. In addition, deep soil at CAP Sites 15 and 25, Inactive Fuel Line Sites F2B, and D5 will require a similar soil management plan for excavations. To date, Inactive Fuel Line Site D1B has not received NFA concurrence; therefore, the current restriction covers all excavations at the site until NFA concurrence has been received to ensure that the Navy has retained sufficient property right's to access and perform remedial activities at the sites as may be required to achieve regulatory closure. Please see response to Water Board Comment 2.

11. **Comment:** **It is not clear which underground storage tanks (USTs) require notifications or restrictions.** Section 6.2.6 states "Tanks that require notifications or restrictions are discussed in Section 6.1.2." Section 6.1.2 states "There are additional USTs in the FOST areas that have not received regulatory closure and require restrictions. Those restrictions will be addressed through the petroleum Corrective Action Plan (CAP) Program described in Section 6.1.3." Section 6.1.3 contains no discussion about USTs. The document should explicitly identify USTs where notifications and restrictions apply (preferably in Section 6.1.2). All restrictions should be clearly identified and documented in this FOST; they should not be "addressed" later in the CAP Program. We request that the last sentence of Section 6.1.2 be revised to state. "*Closure of the USTs will be addressed through the petroleum Corrective Action Plan (CAP) Program....*"

Response: There are no USTs Sites (not associated with a CAP site) within the FOST area that require a notification or restriction.

In order to update the FOST to current NFA concurrence status, Section 6.1.2 has been deleted, because there are currently no known USTs that require notifications or restrictions for residual TPH in soils. The text of the final sentence of the second paragraph of [Section 6.1.32](#) has been revised as follows:

“CAP Site 25 received regulatory concurrence for NFA for petroleum contamination November 21, 2005 for shallow soil and groundwater, as well as closure of suspected removed USTs 2B and 143A through 143I (Water Board 2005u).”

12. **Comment:** **Section 8.2.2, Additional Remedial Obligation.** This section discusses the Navy’s additional remedial obligations and should include the following: (1) regulatory closure for petroleum sites, (2) regulatory closure for PCB sites under the Toxic Substances Control Act (TSCA), and (3) regulatory closure/abandonment of any existing well not needed for long-term monitoring after transfer. Additionally, the document does not contain language that clearly assures the Grantee that the Navy will pursue and complete all Navy-retained remedial actions in a timely manner so that the Grantee will have access to affected sites as soon as reasonably feasible.

Response: The purpose of the FOST is to certify property is suitable to transfer pursuant to CERCLA. The Navy does not intend use the FOST document to establish commitments for issues such as closure of petroleum sites, PCB sites under TSCA, and the closure or abandonment of wells. Rather, such discussion (if appropriate) is appropriately addressed during real estate transfer negotiation.

13. **Comment:** **Section 7.0, Proposed Reuse.** The text in this section discusses future land uses described in the 2003 Environmental Impact Statement, whereas Figure 5 shows future land uses described in the 1996 Draft Reuse Plan. We believe the text should discuss future land uses described in the 1996 Draft Reuse Plan, consistent with Figure 5.

Response: The figure incorrectly depicted the 1996 Draft Reuse Plan. Instead, it should have matched the text and shown the 2003 Environmental Impact Statement (EIS) ([U.S. Department of the Navy 2003](#)) planned reuses. The figure has been modified to show reuses proposed in the 2003 EIS.

Specific Comments

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

Response: Please see response to EPA comment 2; the text has been revised as follows:

“Results of the survey of underground steam utility lines indicated that ACM-wrapped pipes exist only within the TI Core Transfer Parcel (SSPORTS 1998p).”

2. **Comment:** Sections 6.1.6 and 8.1.6, PCBs. There appear to be several inconsistencies in the PCB sites identified where notices/restrictions apply. Section 6.1.6 identifies TX-139 as exceeding both high and low occupancy criteria; it appears to exceed only the high occupancy criterion as indicated later in the same paragraph. Section 8.1.6 states that equipment that exceeds both the high and low occupancy criteria only exist in Building 1 and 450; however, TX-138, which exceeds both criteria, is in Building 453. For building with equipment only exceeding the high occupancy criterion, it appears the list should include Building 452, but not 453. It would be helpful if Section 8.1.6 referred to Figure 6; this figure should include Building numbers referenced in the text. Please confirm that transformer TX-112A, B, C located on parcel T039 (PCB concentration of 2.7 milligrams per kilogram according to November 2004 Draft PCB Summary Report) is not located within the portion of parcel T039 to be included in the FOST.

Response: [Section 6.1.65](#) has been revised as follows

“Additional sampling and analysis of current and former transformer locations within the FOST areas for PCBs was undertaken in 2004 at locations shown on [Figure 3](#). As a result, eight areas were identified within the FOST area boundaries with elevated PCB concentrations that do not meet TSCA requirements. Navy will address these sites prior to transfer following TSCA criteria. As a result, both a notice and restriction are required for these sites.”

Transformer 112 on Parcel T039 was removed prior to the 2004 PCB sampling event, and sampling results for the transformer are actually of the concrete pad where the transformer used to be located. A result of 2.7 mg/kg was reported from a sample from location PCBC039-1B; however, upon review of the data provided in the 2004 Draft PCB Summary Report (see Appendix C-1, page C-12), the sampling result reported was actually “2.7 UJ,” which is a nondetect and estimated value ([Sullivan Consulting Group and Tetra Tech EM Inc. 2004](#)). Therefore, the 2004 PCB Summary Report correctly identifies that this transformer site meets both high and low occupancy criteria

(Sullivan Consulting Group and Tetra Tech EM Inc. 2004). A lesser sign “<” was inadvertently omitted, which should have preceded the “2.7 mg/kg.” The concrete pad is located within the FOST parcel.

Section 8.1.6 has been revised as follows:

“The deed will contain a notice that analytical results for spills related to electrical equipment with reported PCBs that exceed TSCA requirements inside of Buildings 1 (TX-114A, B, TX-140, TX-2045), 450 (TX-146), 452 (TX-139) and 453 (TX-138) in the TI Southwest Transfer Parcel, as shown on Figure 6. Further, analytical results reported PCBs exceeding TSCA requirements at two outdoor transformer locations (TX-127 in parcel T081 and TX-147 in parcel T091) within the TI Core Parcel, as shown on Figure 6.”

3. **Comment:** Section 6.1.6 and 8.2.8, PCBs. Section 6.1.6 states that PCB sites TX-114A&B, TX-127, TX-139, and TX-147 will require a land use restriction limiting use to low occupancy. However, there is no discussion of such a restriction in Section 8.2.8.

Response: Please see the response to City Specific Comment 2 for revisions to Section 6.1.65.

The following text has been added to Section 8.2.8:

“PCBs have been detected at elevated concentrations in several locations within the FOST parcels. The following table presents the current or former location of the transformer, the associated transformer identification number, and the maximum concentration reported in samples from the area adjacent to the transformer locations. The Navy will address the currently occupied sites pursuant to TSCA and based on agreements with DTSC prior to transfer by deed. The deed will contain appropriate notices and covenants restricting use and access and requiring the transferee to maintain the selected remedy of PCB sites as appropriate. For vaults in buildings, if PCBs are present at concentrations exceeding TSCA criteria, access to the vaults will be restricted to authorized personnel with appropriate levels of personal protective equipment. Any modifications to the vault must comply with all regulations regarding PCBs as appropriate. Unoccupied buildings with elevated concentrations of PCBs in transformer vaults will be restricted from use until the building is demolished; or if reuse is to occur, until the PCBs have been addressed by the transferee.”

EBS Parcel	FOST Parcel	Equipment ID Number	Building Occupancy Status	Building and Room	Maximum Concentration
T003	TI Southwest Parcel-B	TX-114A,B	Occupied	Building 1, Room 33	2.9 mg/kg
T003	TI Southwest Parcel-B	TX-140	Occupied	Building 1, Room 37-A	490 mg/kg
T003	TI Southwest Parcel-B	TX-2045	Occupied	Building 1, Room 37-A	490 mg/kg
T023	TI Southwest Parcel-B	TX-146	Unoccupied	Building 450	530 mg/kg 11 µg/cm ²
T034	TI Southwest Parcel-B	TX-138	Unoccupied	Building 453 Vault	320 mg/kg
T034	TI Southwest Parcel-B	TX-139	Unoccupied	Building 452 Vault	8.9 mg/kg
T081	TI Core Parcel	TX-127	NA	Outside Building 420	2.4 mg/kg
T091	TI Core Parcel	TX-147	NA	Outside	1.2 mg/kg

Notes:

µg/cm² Microgram per square centimeter

mg/kg Milligram per kilogram

NA Not applicable, transformer not inside a building

4. **Comment:** **Section 6.2, Environmental Factors that Warrant No Constraints.** The visual inspections documented in the July 8, 2005 Supplemental Environmental Baseline Survey (SEBS) indicate several 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.

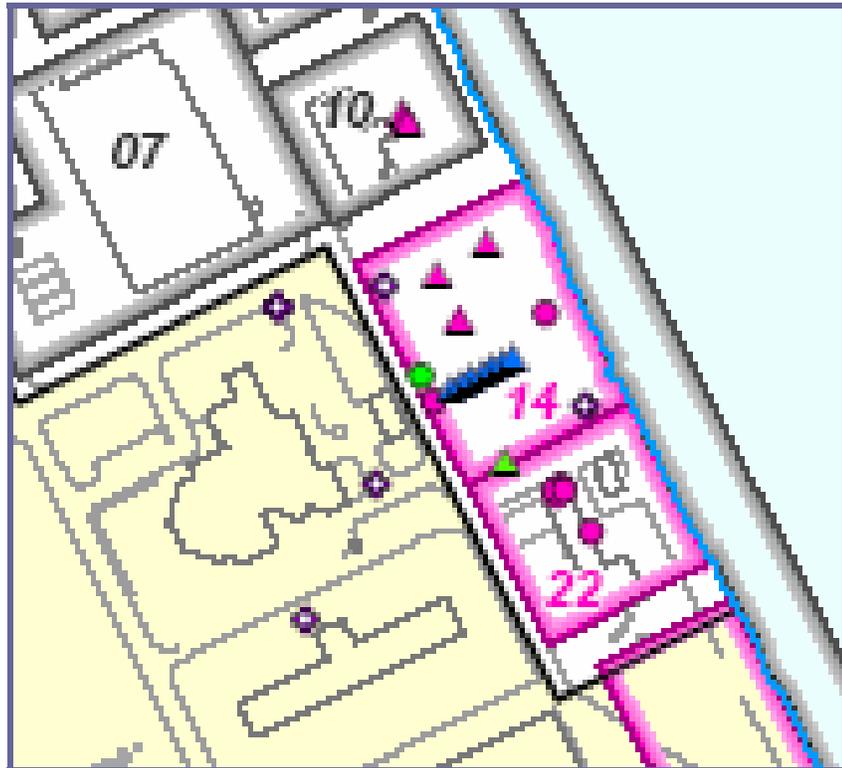
Response: Section 6.2 has been revised to include the following statement:

“The spills and stains noted during the 2004 visual site inspection, as reported in the SEBS, were releases to concrete in the interior of buildings and did not constitute releases to the environment (SulTech 2005p).”

5. **Comment:** **Section 6.2.4, Installations Restoration Program.** The text stated that only petroleum constituents were detected at Site 14/22. Dioxins also were detected. We understand that the Navy believes it has removed all significant concentrations of dioxins from Site 14/22; however, this information has not been documented for review of concurrence.

Response: Parcels T074 and T076 were removed from the FOST due to the ongoing investigation of dioxins in this area. [Section 6.2.4](#) has been revised to reflect the removal of CAP Sites 14/22.

The new FOST area boundary has been modified as shown below to account for the dioxin-affected soil.



6. **Comment:** Section 6.2.6, Subsection “Tanks that have been located.” The text states that 19 USTs have been approved for closure or NFA (see General Comment No. 6 regarding use of the terms “closure” and “NFA”). It appears that only 14 tanks have received closure with the Navy plans to request NFA for five remaining tanks located within CAP sites.

Response: The text of [Section 6.2.6](#) has been revised based on the removal of EBS Parcels T074 and T076, which includes the area of CAP Site 14/22 removed from the FOST area, to indicate 12 USTs have received NFA concurrence.

7. **Comment:** Section 6.2.6, Subsection “Previously suspected tanks that never existed.” Please provide the reference for the documentation that summarizes the site investigations that resulted in the conclusion that the tanks did not exist.

Response: [Section 6.2.6](#) has been revised to include a reference to the 2004 Facilitywide UST Summary Report (Shaw Environmental & Infrastructure, Inc. [[Shaw](#)] 2004t).

8. **Comment:** **Section 6.2.8, Site 10. The site description should be updated to include the recent detections of petroleum hydrocarbons and dioxins. Because the petroleum and dioxins appear to have been continuous onto the TI Core parcel (Site 14), it is unclear how a buffer exists between Site 10 and the TI Core parcel.**

Response: The site boundary includes a buffer that was expanded after submittal of the draft FOST to include EBS Parcels T076 and T074; therefore, no dust hazards would likely be associated with Site 10.

9. **Comment:** **Section 6.2.8, Site 24. The text states that groundwater does not flow toward the FOST parcels. Actually, groundwater in the A and B zones does flow toward the TI Core Parcel. Additionally, groundwater in the C Zone flows to the southeast, not the northeast as the text suggests.**

Response: Based on a review of the groundwater compendium presented in 2004, groundwater appears to be flowing to the Bay but is not flowing toward the TI Core Parcel.

[Section 6.2.8](#) has been revised as follows:

“Groundwater generally flows in a northeastern direction in the A and B zones, partially in the direction of the TI Core Parcel; however, the boundaries of Site 24 were previously adjusted by the BCT to ensure that an adequate buffer exists between Site 24 and the TI Core Parcel. Further investigations to confirm the direction of groundwater flow in the C zone are ongoing.”

10. **Comment:** **Section 6.2.8, Site 32. The text states that chemicals of concern were not detected in groundwater at concentrations above screening criteria. This is not correct. Several inorganic constituents were detected above screening criteria in groundwater samples.**

Response: [Section 6.2.8](#) has been revised as follows:

“Chemicals of potential concern (COPC) in soil include PCBs, TPH as diesel and motor oil, dioxins, and pesticides. These COPCs were not detected in groundwater at Site 32 at concentrations above screening criteria, although metals were detected in groundwater above screening criteria.”

11. **Comment:** Section 8.1.5, Notices for Residual Petroleum Contamination. Section 8.1.5 should include Site 15 as a site where residual petroleum has been left in place. This section identifies Pipeline Site F2A as having residual petroleum contamination left in place, but does not identify the depth of this contamination.

Response: Please see the response to Water Board Comment 2 for revised notices for petroleum sites.

12. **Comment:** Section 8.3, Summary of Notifications and Restrictions. The in-text table contains a subheading for “Notices” but not one for “Restrictions.”

Response: Comment noted.

13. **Comment:** Figures 2 through 6. The eastern boundary of the TI Southwest Transfer Parcel B is misaligned with the boundary between Parcel T029 and T028.

Response: Comment noted. As a point of clarification, the boundary is correct as presented on the figures. The previously transferred parcel and EBS parcel boundaries do not align exactly.

14. **Comment:** Figure 3. This figure should show the recently revised boundaries for Sites 6 and 24. The boundaries for Sites 14 and 22 do not appear to be correct on this figure or on Figure 6. We have understood that Sites 14 and 22 include all of Parcels T076 and T074, respectively. Also, please confirm the boundaries for Sites 7 and 10.

Response: Figure 3 has been revised to more clearly depict the boundaries for Site 6: the “pink” boundary reflects the petroleum site boundary, and the “gray” boundary shows the CERCLA boundary. The figure reflects the current Site 24 boundary. The boundaries for Site 14/22 have been revised to more closely match the riprap line along the shore, although the portion of Site 14/22 along the shoreline has been removed from the FOST. The boundaries for Site 10 have been revised to reflect those shown in the Sites 9 and 10 remedial investigation report.

15. **Comment:** Figure 6. Pipeline Site D5 should be included on this figure because the text in Section 8.1.5 states that a notice is required for this site.

Response: Figure 6 has been revised to include the restricted area within Inactive Fuel Line Site D5.

ADDITIONAL COMMENT RECEIVED FROM GEOMATRIX:

1. **Comment:** *Request to Review Final Draft before FOST is Finalized.* We appreciate the Navy's efforts to address Stakeholder comments before finalizing the Treasure Island (TI) FOST; however, because different information was distributed throughout the various responses, we found it difficult to visualize how the text of the final document will appear based only on the RTCs. Because the FOST is such an important foundation for the entire transfer process, we request the opportunity to review a Final Draft before the TI FOST is finalized. While we understand that this could result in a delay of the Navy's schedule, we strongly believe that is it critical to have a comprehensible final FOST that will not be subject to misinterpretation or criticism.

Response: A redlined version of the Word™ has been will be provided for review to the BCT prior to finalization of the FOST, tables and figures will be provided upon request.

2. **Comment:** **Restriction on Petroleum Sites that have not Received No Further Action (NFA) — Prohibition Against Disturbing Soil Below 6 Inches.** Currently, the only petroleum site within the FOST property that has not received NFA is Site D1B. According to Section 8.1.5 of the Revised Draft FOST, “Elevated concentrations of petroleum hydrocarbons in soil remain in-place (sic) 5 feet bgs and deeper at Site D1B.” We request that this restriction be changed to prohibit disturbing soil below 2 feet below ground surface (bgs). This revision will allow minor subsurface intrusion to occur (e.g., fence post installation) without having to seek written approval from the Navy. If the information in the FOST is correct, no significant petroleum-affected soil should be encountered within the upper two feet. On another point, the current response to Regional Board Comment number 2 states that this prohibition will remain in effect until it “is no longer necessary, and the Navy agrees.” We request that it be clarified that the pre-NFA restriction for Site D1B will no longer be necessary when NFA has been approved by agencies.

Response: The six-inch restriction at Site D1B will remain in place until the Water Board has concurred with NFA at the site.

As stated in the response to the Water Boards Comment #2: restrictions in place at petroleum sites that have not received a NFA concurrence letter from the Water Board will either be removed from the deed or modified depending on the conditions required in the closure report and the Water Board NFA concurrence letter at the time the response actions have been completed. Regulatory closure at a petroleum site is defined as the receipt of a NFA concurrence letter from the Water Board based on the closure report. Restrictions have been placed on sites prior to NFA concurrence to

ensure that the Navy has retained sufficient property right's to access and perform remedial activities at the sites as may be required to achieve regulatory closure. The pre-NFA notice and restriction at Site D1B will be reviewed upon receipt of the NFA concurrence letter, and any restrictions or notices required will be added.

3. **Comment:** *Lead Based Paint (LBP) Land Use Controls (LUCs).* In the new proposed text (November 18 response to DTSC Comment number 2), the Navy states that LBP on surfaces or in soils must be remedied before buildings/land can be utilized for residential use. We request adding “must be remedied, if necessary,…”

Response: The text in [Section 8.2.4](#) has been revised as suggested.

4. **Comment:** *Land Use Restrictions for PCBs.* The new text for Section 8.2.8 (November 18 RTC to City specific comment number 3) indicates that the Navy will address currently occupied sites before transfer by deed based on agreements with DTSC. TIDA requests to be involved in these discussions so that we have a clear understanding of these agreements. Additionally, the response includes an in-text table that identifies locations with elevated PCB concentrations. We request that this table identify which buildings are occupied/unoccupied. We also request that the table identify potentially applicable criteria that would allow for occupancy of the buildings.

Response: The Navy and DTSC have agreed to agree on PCB criteria, has agreed to include and the TIDA has requested to be included in any discussions that would impact future landowners.

In addition, the in-text table has been revised to include a column indicated if a building is occupied or unoccupied or “NA” for outdoor sites.

The in-text table has not been revised to include personal protective equipment criteria as any number depends on a series of variables that can't be predicted at this time as Occupational Safety and Health Act requirements are a responsibility of the facility owner or tenant.

**RESPONSES TO COMMENTS FROM MS. DALE SMITH (NAVAL STATION TREASURE ISLAND
RESIDENT ADVISORY BOARD MEMBER)**

General Comment

1. Comment: The documents are sorted by company name, not year. This makes it very difficult to locate the appropriate document. One must know which consultancy performed which tasks in order to find them.

Response: Comment noted. Year breaks will be added to aid the reader in finding documents.

Specific Comments

1. Comment: Page 2. In the documents reviewed section, no mention is made of the review of radiologicals, although a letter is cited in 2005 and reference is made to a records search on page 27. Should not this report be included in the documents reviewed section?

Response: A Draft Historical Radiological Assessment report was issued on August 22, 2005, and a letter report summarized the preliminary findings reported to the BCT in March 2005. The Draft Historical Radiological Assessment issued August 22, 2005 ([Weston Solutions, Inc. 2005](#)) has been added to the reference list, in addition to the Navy's March letter.

2. Comment: Page 32. In the section discussing Site 6 the third sentence is not complete and probably should be struck.

Response: The text has been revised as suggested.

3. Comment: Page 36. T015 is listed as a hazardous substance disposal, storage or release area in the Table section, but it is not described in the body of the document. Why are corrosives treated differently than other hazardous? Should it not be mentioned as other problem sites are?

Response: The FOST discusses categories of potential contaminants or releases in [Sections 6.2.4](#), Installation Restoration Program, [Section 6.1.65](#), PCB, and [Section 6.1.1](#), Asbestos-Containing Material. In addition, CERCLA Section 120(h) requires that the Navy disclose any hazardous substances stored, released, or disposed of at the property if certain information is known. Hazardous substances can be either listed (as in a specific chemical) or characteristic (meaning toxic, corrosive, and so forth). Hazardous substances having the characteristic of corrosivity were stored but not released on the property. The purpose of the referenced table is to

disclose storage of these chemicals, as discussed in [Section 8.1.1](#). Hazardous substances with the characteristic of corrosivity are not discussed elsewhere in the document because there is no record of release. If there was evidence of such a release, it would be discussed in [Section 6.2.4](#), Installation Restoration Program.

RESPONSE TO COMMENT FROM MR. EMERIC KALMAN (COMMUNITY MEMBER)

- Comment:** Treasure Island is located in a seismic hazard area of the San Francisco Bay. An earthquake exceeding 7.0 magnitude may also trigger a tsunami and/or liquefaction of a portion of this man made island, composed mainly of unreinforced landfill. How will this threat to human life, and the properties or the environment be addressed to comply with all applicable federal, state, and local laws and regulations?

Response: Future land owners will be required to comply with all applicable federal state and local laws and regulations, including those that address seismic hazards.

RESPONSE TO COMMENT FROM MR. NATHAN BRENNAN (COMMUNITY MEMBER)

- Comment:** Please clarify Table 4: Lead-Based Paint information for nonresidential buildings constructed before 1978 within the FOST area, Status at Time column, it is not clear what “no closure action required”

Response: The text has been revised as follows: “No action is required for closure.”

RESPONSE TO COMMENT FROM MR. DOUGLAS RYAN (COMMUNITY MEMBER)

- Comment:** Page 26, 1st Paragraph, 4th Sentence. Grammatical errors were found. Sentence reads “Because *[the]* four of the sites, all indoors and identified as TX-138, TX-139, TX-140, TX-146, and TX-2046[,], have not received....” Remove *[the]* and extra *[,]*.

Response: The section has subsequently been revised.

REFERENCES

Shaw Environmental & Infrastructure, Inc. (Shaw). 2004. "Final Facilitywide UST Summary Report Update." August 25.

Sullivan Consulting Group and Tetra Tech EM Inc. 2004. "Draft PCB Summary Report, Former Naval Station Treasure Island, San Francisco, California." November.

SulTech. 2005. "Final Supplemental EBS, NAVSTA TI, San Francisco, California." July 8.

U.S. Department of the Navy. 2003. "Final Environmental Impact Statement." June 27.

Weston Solutions, Inc. 2005. "Draft Treasure Island Naval Station Historical Radiological Assessment, Former Naval Station Treasure Island, San Francisco, California." August.