



# PROPOSED PLAN/DRAFT REMEDIAL ACTION PLAN FORMER NAVAL STATION TREASURE ISLAND Installation Restoration Site 32 Former Training and Storage Area

San Francisco, California

September 2011

## THE DEPARTMENT OF THE NAVY ANNOUNCES PROPOSED PLAN/DRAFT REMEDIAL ACTION PLAN

### 1.0 INTRODUCTION

The Department of the Navy (Navy) presents this *Proposed Plan/Draft Remedial Action Plan (RAP)* for no further action for *Installation Restoration (IR)* Site 32 (Site 32), the former Training and Storage Area, at the former Naval Station Treasure Island (NAVSTA TI) in San Francisco, California (Figure 1). The Navy is presenting this plan in cooperation with the California Environmental Protection Agency (Cal/EPA) *Department of Toxic Substances Control (DTSC)*, the Cal/EPA *Regional Water Quality Control Board (Water Board)*, and the *U.S. Environmental Protection Agency (EPA)*.

The Navy is responsible for investigating and remediating contamination that resulted from historical Navy operations at former NAVSTA TI. Site 32 previously contained soil contaminated with *polychlorinated biphenyls (PCB)*, *total petroleum hydrocarbons (TPH)*, *benzo(a)pyrene (B(a)P)*, arsenic, lead, and dioxins. The contaminated soil was removed from Site 32 in 2010 and disposed of offsite at permitted landfills. This Proposed Plan/Draft RAP presents the Navy’s preferred decision for Site 32 under the *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)*. The Navy proposes that no further environmental cleanup is required for Site 32 because all soil that posed *unacceptable risk* to human health or the environment was removed as part of a cleanup action conducted in accordance with the *Toxic Substances Control Act (TSCA)*.

### ABOUT THIS PROPOSED PLAN/ DRAFT RAP

The Navy is issuing this Proposed Plan/Draft RAP as part of its public participation responsibilities under Section 117(a) of CERCLA, Section 300.430(f) (2) of the *National Oil and Hazardous Substances Pollution Contingency Plan (NCP)*, and Chapter 6.8 of the California Health and Safety Code (HSC). The purpose of this Proposed Plan/Draft RAP is to present the Navy’s no further action decision to the public and solicit public comment. It summarizes site history, describes the environmental

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### — Notice —

### PUBLIC COMMENT PERIOD

September 16 through October 17, 2011

### PUBLIC MEETING

September 27, 2011

Casa de la Vista, Building 271  
Treasure Island  
6:30 to 8:30 p.m.

This public meeting is an opportunity for the community to hear about the Navy’s Proposed Plan and to provide formal oral and written comments.

investigations and cleanup actions conducted at the site in accordance with CERCLA as amended by the *Superfund Amendments and Reauthorization Act (SARA)* and TSCA, and explains the basis for the Navy's decision that no further action is required at Site 32. The information presented is detailed in the *Remedial Investigation (RI)* report and *TSCA Field Activity Report (FAR)*, along with other documents contained in the *Administrative Record* for Site 32. The administrative record contains the reports and historical documents used to support cleanup decisions. The Navy encourages the public to review these documents to gain an understanding of Site 32 and the environmental assessments and investigations that have been conducted. The documents are available for public review at the locations listed on page 11.

The Navy will consider and respond to public comments on this Proposed Plan/Draft RAP in a responsiveness summary to be included in the *Record of Decision/Final RAP (ROD/Final RAP)* for Site 32. A public comment period will be held from September 16 through October 17, 2011. Public comments can be submitted by mail, fax, or e-mail throughout the comment period to James Sullivan, *Base Realignment and Closure (BRAC)* Environmental Coordinator, BRAC Program Management Office West, 1455 Frazee Road, Suite 900, San Diego, California 92108-4310, (619) 532-0983 (fax), james.b.sullivan2@navy.mil. A public meeting will be held from 6:30 to 8:30 p.m. on September 27, 2011 at the Casa de la Vista, Building 271, Treasure Island. Members of the public may also submit written and oral comments on this Proposed Plan/Draft RAP at the public meeting.

After it has consulted with the regulatory agencies, the Navy will make a final decision regarding Site 32 based on feedback from the community or new information. Therefore, the community is encouraged to review and comment on this Proposed Plan/Draft RAP. A final decision on the remedy will be documented in the ROD/Final RAP.

## 2.0 SITE BACKGROUND

Former NAVSTA TI lies in San Francisco Bay (Figure 1) and consists of two contiguous islands: Treasure Island (TI) and Yerba Buena Island (YBI). TI was constructed on the shoals of YBI with San Francisco Bay fill between 1936 and 1937 for use as an airport for the City of San Francisco. It was also the site of the 1939 Golden Gate International Exposition. Navy operations at the island began in 1941, primarily for training, administration,

housing, and other support services to the U.S. Pacific Fleet. In 1993, the Department of Defense's Base Closure and Realignment Commission recommended closure of NAVSTA TI; the facility was subsequently closed on September 30, 1997.

Site 32 consists of portions of Parcel T111 and Parcel T115 and is located along the northeastern edge of TI, occupying approximately 2.6 acres (Figure 2). A portion of the parcel was most recently used as a hazardous waste and hazardous materials storage area. Historically, Site 32 contained the USS Pandemonium (Building 371/training facility), which was used for radiological decontamination training. The mock training ship was placed on land on top of a 9-inch-thick concrete pad at the northern portion of Site 32. The Navy demolished the USS Pandemonium superstructure in 1996.

Site 32 also contained Buildings 445, 462, and 463 (Figure 2). Building 445 was used for forklift maintenance, boat motor storage, general shop activities, and administrative offices. Building 462 was used for administrative offices and classrooms where personnel were instructed



Figure 1. Location of Former Naval Station Treasure Island and Site 32

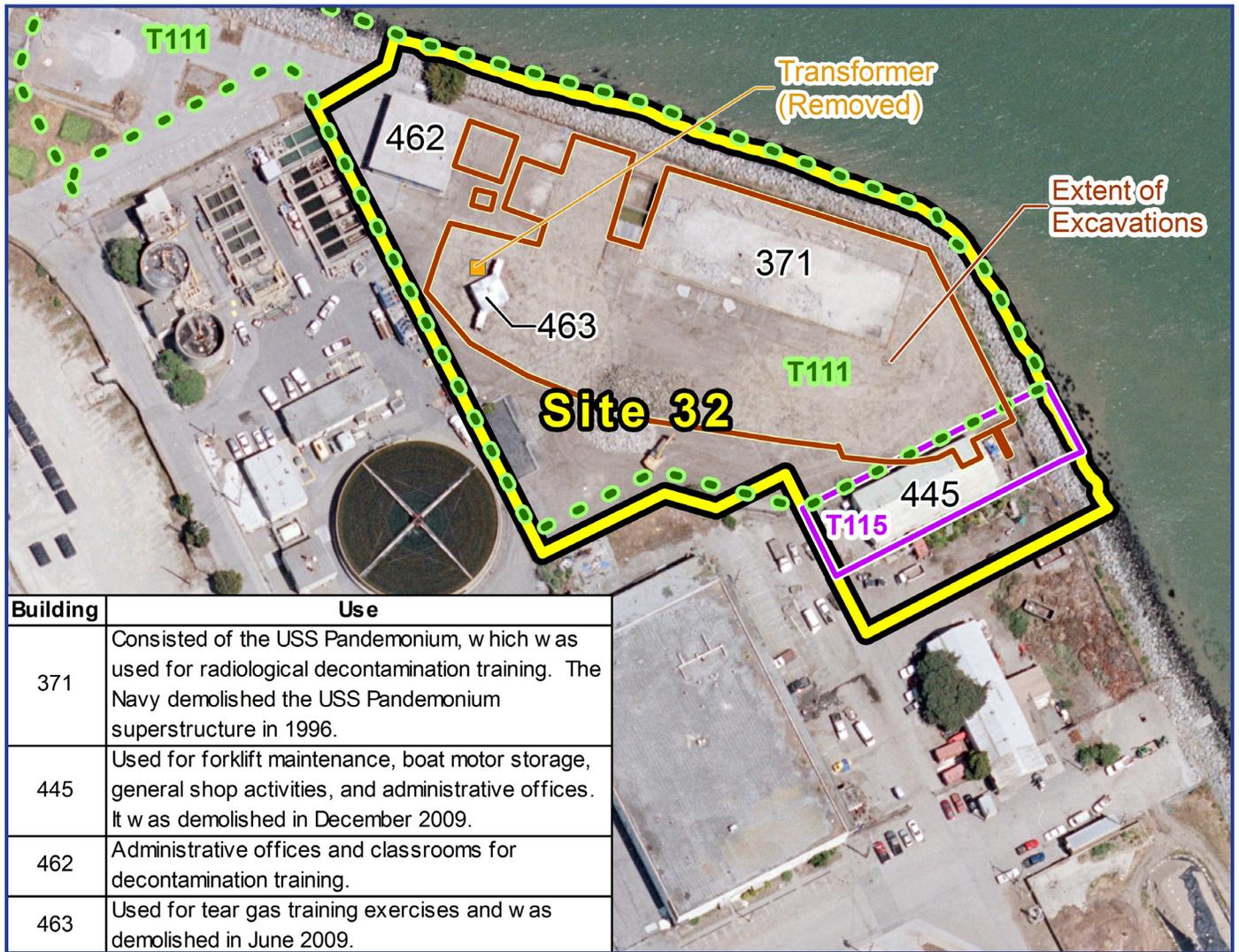


Figure 2. Site Features and Buildings Located on Former Naval Station Treasure Island Site 32

in decontamination procedures for the Naval Technical Training Center. Building 463 was used for tear gas training exercises. A former transformer known to have released PCBs was historically present approximately 10 feet north of Building 463.

Site 32 boundaries that required further evaluation in an RI. As set forth below, Site 32 was first designated and identified for further environmental investigation in 2003 based on the results of a data gaps investigation.

### 3.0 PREVIOUS INVESTIGATIONS

In April 1988, a *Preliminary Assessment/Site Inspection (PA/SI)* was conducted at NAVSTA TI to identify and assess sites posing a potential threat to human health or the environment due to contamination from past hazardous materials operations. The PA/SI identified a total of 26 potentially contaminated sites at NAVSTA TI by using information from historical records, aerial photographs, regulatory agency contacts, field inspections, and personnel interviews. The PA/SI report did not identify any sites within the current

#### Previous Investigations at Site 32

- Preliminary Assessment/Site Inspection at NAVSTA TI (1988)
- Environmental Baseline Survey (1995)
- Historical Radiological Assessment (2006)
- Screening-Level Ecological Risk Assessment (2007)
- Remedial Investigation (2008)
- TSCA Cleanup (2009-2010)

## Site 32 Cleanup Process

### Preliminary Assessment / Site Inspection

An initial review of the site, including review of historical records and visual inspections. Sampling and analysis of soil, surface water, or groundwater (or some combination) may occur to evaluate whether future investigations are needed. Completed at NAVSTA TI in 1988.

### Remedial Investigation

A closer look including collecting samples to assess risk to human health and the environment. Completed at Site 32 in 2008.

### TSCA Cleanup Action

An excavation conducted under TSCA in 2009 and 2010 to remove soil contaminated with PCBs, TPH, B(a)P, arsenic, lead, and dioxins. The FAR was prepared to summarize the cleanup action.

### Proposed Plan/Draft RAP

A fact sheet that describes cleanup alternatives and explains the preferred alternative. This step requires a public meeting be held to provide information to the public and allow the public to comment on the preferred alternative. Site 32 is at this step.

### Record of Decision/Remedial Action Plan (ROD/Final RAP)

The decision that no action is required will be documented and publicized in this document. A summary and responses to all comments on the Proposed Plan are included in this document.

The following paragraphs describe the various investigations conducted at NAVSTA TI and Site 32. The Site 32 Cleanup Process chart on page 4 provides an explanation of the investigations and cleanup steps conducted under CERCLA, TSCA, and the HSC.

In 1995, an *Environmental Baseline Survey (EBS)* was conducted at NAVSTA TI as part of the base closure process that identified 13 areas requiring additional investigations. An EBS data gaps investigation was conducted in 2003 to determine whether further action was required in the 13 areas. Parcels T111 and T115 were two of these 13 areas. Site 32, consisting of portions of Parcels T111 and T115, was established and the site boundary determined based on data collected during the 2003 EBS data gaps investigation.

A Historical Radiological Assessment (HRA) of NAVSTA TI was conducted in 2006. The HRA included an evaluation of the mock training ship USS Pandemonium (Site 32, Building 371). The Navy used the USS Pandemonium for radiological decontamination training activities until 1992 and demolished it in 1996. The Navy had used bromine-82, bromine-80, potassium-42, and

sodium-24, which are short-lived isotopes, during decontamination training on the exterior decks of the USS Pandemonium. These radiological isotopes have a half-life of about 10 days and decay to a negligible quantity. Based on the Navy's evaluation of its past radiological operations, which included reviewing radiological data in licenses, site permits, authorizations, and operating records, the HRA did not identify any radiological impacts at Site 32.

The risks to plants and animals were evaluated in a *screening-level ecological risk assessment (SLERA)* conducted by the Navy in 2007. The SLERA evaluated the potential for terrestrial receptors to be exposed to soil at several TI sites, including Site 32. The SLERA did not identify any ecological resources at TI that need to be protected. Based on the results of the SLERA, the Navy did not recommend further evaluation of ecological risk for Site 32. The Navy also evaluated the potential impacts to marine receptors in San Francisco Bay and found that Site 32 *groundwater* did not pose a potential risk to the marine receptors.

An RI report was prepared for Site 32 in 2008 and identified levels of PCBs that exceeded the EPA residential *preliminary remediation goals (PRG)* for soil. In addition, TPH as diesel and motor oil, B(a)P, arsenic, lead, and dioxins in soil samples were reported at concentrations greater than the EPA PRGs or TI ambient concentrations.

As part of the RI process, the Navy conducted a baseline *human health risk assessment (HHRA)* to determine whether *remedial action* was necessary. Environmental data collected at Site 32 were used to assess the extent of impacts to the soil and groundwater and to evaluate potential risks to human health and the environment.

At Site 32, cancer risks were found to be within the EPA *risk management range*. However, the noncancer hazard index (HI) for future residents and construction workers exceeded 1. When the HI is greater than 1, the potential exists for adverse health effects to occur. This risk was based on PCBs; therefore, the Navy concluded that soil contaminated with PCBs should be removed.

TSCA addresses cleanup of PCBs; therefore, in 2009, the Navy conducted a cleanup action under TSCA to excavate soil containing more than 1 part per million PCBs, which is the level considered safe for residential use.

As discussed in the following section, no further cleanup under TSCA or CERCLA is required since

## What is a Risk Assessment?

A human health risk assessment is the process used to estimate the nature and probability of adverse health effects in humans who may be exposed to chemicals in contaminated environmental media. Under EPA guidance, the Navy looks at cancer risk and noncancer risk. For cancer causing chemicals, the risk estimate is expressed as the probability of additional lifetime cancers (for example, one in a million or 10<sup>-6</sup>). Cancer risks between 10<sup>-6</sup> (1 in 1,000,000) and 10<sup>-4</sup> (1 in 10,000) are described as being within the risk management range and remedial action is generally not required. Noncancer risk is described by the hazard index (HI) for chemicals that pose health risks other than cancer. An HI of 1 or less means that adverse noncancer human health risks are not expected to occur and remedial action is generally not required.

the Navy has now removed all contaminated soil that posed unacceptable risk to human health, and none of the remaining chemical concentrations exceeds Site 32 cleanup goals.

## 4.0 PCB CLEANUP ACTION UNDER THE TOXIC SUBSTANCES CONTROL ACT

TSCA is the environmental law that addresses cleanup and management of PCBs. After the HHRA, the Navy completed a cleanup action for PCBs and other co-located contaminants. The cleanup action was completed in accordance with TSCA in 2010. The cleanup action was conducted as described in the final work plan that was approved by DTSC, the Water Board, and EPA (Shaw Environmental, Inc., "Final Work Plan Soil Remediation Parcel T111/Site 32," May 26, 2009). All soil that contained PCBs above levels considered safe for unrestricted use was excavated and removed from Site 32. As part of this excavation, soil contaminated with TPH, B(a)P, arsenic, lead, and dioxins was also removed. Shallow groundwater present in the excavation and contaminated with TPH was treated by *enhanced aerobic bioremediation*. The Navy then received concurrence from the regulatory agencies to backfill the excavation. Approximately 12,500 tons of contaminated soil was removed and replaced with

clean backfill. None of the remaining chemical concentrations exceeds Site 32 cleanup goals.

The Navy was not required to prepare a feasibility study under CERCLA because the TSCA cleanup action removed all soil containing PCBs above the cleanup level of 1 milligram per kilogram and also removed all other constituents that exceeded NAVSTA TI cleanup goals. Since there is no longer an unacceptable risk to human health or the environment, no additional cleanup action is necessary for Site 32.

## 5.0 REGULATORY SUMMARY

This section summarizes the regulatory interaction and requirements related to Site 32.

### MULTI-AGENCY PARTICIPATION

The BRAC Cleanup Team for NAVSTA TI includes remedial project managers (RPM) from the Navy, DTSC, Water Board, and EPA. The primary goals of the RPMs are to protect human health and the environment, coordinate environmental investigations, and expedite the environmental restoration of former NAVSTA TI. The RPMs have coordinated on all major documents and investigations associated with Site 32, including the RI report and the FAR. Based on these reviews and discussions of key documents, the regulatory agencies support the Navy's decision that no further action is required. This decision may be modified in response to public comments or new information.

### CALIFORNIA HEALTH AND SAFETY CODE (HSC)

This document is intended to meet the requirements of HSC Section 25356.1 for hazardous substance release sites, as required by DTSC. The HSC requires preparation of a RAP for sites that are not listed on the *National Priorities List (NPL)*, such as NAVSTA TI. Therefore, this document also serves as a Draft RAP to fulfill the public notice and comment requirements of the HSC. The Final RAP will be incorporated in the ROD for this site.

### CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

DTSC has determined that the decision of no further action for Site 32 is a discretionary action that is exempt from CEQA. Therefore, DTSC has prepared a Notice of Exemption in compliance with CEQA.

## NONBINDING ALLOCATION OF RESPONSIBILITY

HSC Section 25356.1(e) requires DTSC to prepare a preliminary nonbinding allocation of responsibility among all identifiable potentially responsible parties. HSC Section 25356.3(a) allows potentially responsible parties with an aggregate allocation in excess of 50 percent to convene an arbitration proceeding by submitting to binding arbitration before a panel. Based on available information regarding the former NAVSTA TI, DTSC concludes that the Navy is a responsible party with aggregate alleged liability in excess of 50 percent of the costs of removal and remedial action pursuant to HSC Section 25356.3. The Navy may convene arbitration if it so chooses.

## 6.0 COMMUNITY PARTICIPATION

The Navy, DTSC, Water Board, and EPA encourage the public to gain a more thorough understanding of Site 32 and the CERCLA activities at former NAVSTA TI by visiting the information repository, reviewing the administrative record, attending public meetings, and signing up for the mailing list to receive project information. The information repository was established to provide public access to technical reports and other IR Program information that supports the remedial action alternative decision. The administrative record

for Site 32 contains the reports and historical documents used to support the decision that no further action is required. Restoration Advisory Board meetings are held on the third Tuesday of every other month and are open to the public.

Consideration of public input is an important part of the remedy selection process. The Navy, DTSC, Water Board, and EPA encourage all community members, business owners, and other interested stakeholders to provide input on the decision that no further action is required. The dates of the public comment period and the date, location, and time of the public meeting are provided on page 1 and in the callout box below.

## THE NEXT STEP

The Navy will consider all public comments received during the public comment period, or presented in person at the public meeting, before making a final decision for Site 32. The final decision will be documented in a ROD/Final RAP, which will include responses to comments received on this Proposed Plan/Draft RAP. Input will be collected after the Proposed Plan/Draft RAP is presented to the public, and a final decision will be made after regulatory agency and community input on the Proposed Plan/Draft RAP has been reviewed. A public notice will be placed in the San Francisco Chronicle announcing when the Site 32 ROD/Final RAP will become available to the public in the information repositories listed on page 11.

## OPPORTUNITIES FOR INVOLVEMENT

**Public Meeting, 6:30 to 8:30 p.m., September 27, 2011**

**Location: Casa de la Vista, Building 271, Treasure Island**

You are invited to the public meeting to discuss and comment on the Proposed Plan/Draft RAP for Site 32. The Navy and DTSC will conduct a formal Proposed Plan/Draft RAP presentation during the first hour of the meeting, which will be followed by a Navy open house until 8:30. Highlights of the Proposed Plan/Draft RAP will be presented at various information displays during the open house. You will have the opportunity to visit these displays at your own pace, discuss, and ask questions about the Proposed Plan/Draft RAP one-on-one with representatives of the Navy and DTSC. You will also have the opportunity to formally comment on the Navy's decision that no further action is required for Site 32 as presented in this Proposed Plan/Draft RAP during both the presentation and open house.

**Public Comment Period**

**September 16 through October 17, 2011**

We encourage you to comment on this Proposed Plan/Draft RAP during the public comment period. You may provide comments on the Proposed Plan/Draft RAP orally at the public meeting or submit your comments in writing at or after the public meeting. You may mail or e-mail written comments on this Proposed Plan/Draft RAP to the Navy contact person provided on page 11, postmarked no later than October 17, 2011.

## 7.0 GLOSSARY OF TERMS

**Administrative Record** – Reports and historical documents used to select remediation or environmental management alternatives.

**Base Realignment and Closure (BRAC)** – Program established by Congress under which Department of Defense installations undergo closure, environmental cleanup, and property transfer to other federal agencies or communities for reuse.

**Benzo(a)pyrene (B(a)P)** – A member of a class of chemicals called polycyclic aromatic hydrocarbons, which may cause an increase in the risk of cancer.

**Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)** – A federal law designed to identify and cleanup sites contaminated with hazardous substances that may endanger public health or the environment.

**Department of Toxic Substances Control (DTSC)** – A part of the Cal/EPA and California's lead environmental regulatory agency. Its mission is to protect public health and the environment from toxic substances.

**Enhanced Aerobic Bioremediation** – A cleanup technology that accelerates naturally occurring in-situ biodegradation of petroleum hydrocarbons by providing oxygen to indigenous microorganisms in the subsurface.

**Environmental Baseline Survey (EBS)** – An environmental report setting forth all existing information related to storage, release, treatment, or disposal of hazardous substances or petroleum products on the property to determine whether there has been a release or threatened release of any hazardous substance or petroleum product.

**Field Activity Report (FAR)** – An environmental report that documents activities conducted in the field and may include information such as sampling results, unanticipated field conditions, and deviations from the work plan.

**Groundwater** – Water below the ground surface in rock or sediment.

**Human Health Risk Assessment (HHRA)** – An analysis of the potential adverse human health effects caused by exposure to hazardous substances released from a site.

**Installation Restoration (IR)** – The IR Program is the Department of Defense's comprehensive

program to investigate and clean up environmental contamination at military facilities in full compliance with CERCLA.

**National Oil and Hazardous Substances Pollution Contingency Plan (NCP)** – The regulatory basis for government responses to oil and hazardous substances spills, releases, and sites where these materials have been released.

**National Priorities List (NPL)** – The federal list of Superfund sites nationwide. NPL sites are considered high priority for cleanup under the federal Superfund program. NAVSTA TI is not on the NPL.

**Polychlorinated Biphenyls (PCB)** – Mixtures of up to 209 individual chlorinated compounds. Many commercial PCB mixtures are known in the U.S. by the trade name Aroclor. PCBs have been used as coolants and lubricants in transformers, capacitors, and other electrical equipment because they do not burn easily and are good insulators. Their use in the U.S. was banned in 1978.

**Preliminary Assessment (PA)** – An assessment of information about a site and its surrounding area designed to determine whether a site poses little or no threat to human health and the environment or, if it does pose a threat, whether the threat requires further investigation.

**Preliminary Remediation Goals (PRG)** – Contaminant concentrations in environmental media (soil, air, and water) that EPA considers to be health protective of human exposures (including sensitive groups), over a lifetime.

**Proposed Plan/Draft Remedial Action Plan (RAP)** – A document that summarizes the Navy's recommended or preferred cleanup actions, explains the reasons for recommending them, and solicits comments from the community. The RAP is required under California HSC Section 25356.1 for sites that are not listed on the NPL. A Draft RAP is the California HSC equivalent of the Proposed Plan.

**Receptor** – Any organism (human, animal, or plant) that may be exposed to site contaminants.

**Record of Decision/Final RAP (ROD/Final RAP)** – A decision document that identifies the remedial alternatives chosen for implementation at a CERCLA site; the ROD/Final RAP is based on information from the RI report and on public comments and community concerns. A Final RAP is the California HSC equivalent of the ROD.

**Remedial Action** – The actual construction or implementation phase of CERCLA site cleanup. The remedial action is based on the specifications described in the ROD.

**Remedial Investigation (RI)** – An investigation designed to evaluate the nature and extent of contamination and to estimate human health and ecological risks posed by chemicals of potential concern at a site.

**Regional Water Quality Control Board (Water Board)** – The California water quality authority, which is part of the Cal/EPA. Its mission is to preserve, enhance, and restore California's water resources.

**Risk Management Range** – The risk management range, established by EPA, is a guideline for making risk management decisions. The range is considered to represent an excess lifetime cancer risk that is acceptable.

**Screening-Level Ecological Risk Assessment (SLERA)** – An analysis of the potential negative ecological effects to plants and animals caused by exposure to hazardous substances released from a site.

**Site Inspection (SI)** – A study where environmental and waste samples are collected to determine what hazardous substances are present at a site and if these substances are being released to the environment.

**Superfund Amendments and Reauthorization Act (SARA)** – SARA amended CERCLA on October 17, 1986, making several important changes and additions to the program, including new enforcement authorities and settlement tools.

**Total Petroleum Hydrocarbons (TPH)** – Petroleum hydrocarbons are organic compounds that contain only carbon and hydrogen. TPHs refer to mixtures of petroleum-based hydrocarbon constituents such as those found in gasoline, diesel fuel, and motor oil.

**Toxic Substances Control Act (TSCA)** – A federal law that addresses the production, importation, use, and disposal of specific chemicals including PCBs, asbestos, radon, and lead-based paint.

**Unacceptable Risk** – A quantification of potential harm to humans, animals, or plants from exposure to contaminants at elevated levels. An unacceptable risk means there is a threat to human health or the environment from exposure to contaminants at

elevated levels requiring that a remedial action be taken.

**U.S. Environmental Protection Agency (EPA)** – The federal regulatory agency responsible for administration and enforcement of CERCLA (and other federal environmental regulations).



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James Sullivan  
BRAC Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-43101

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## INFORMATION REPOSITORIES

Two information repositories and the administrative record provide public access to technical reports and other IR Program information that support this Proposed Plan/Draft RAP.

**San Francisco Public Library**  
 Government Publications Section  
 100 Larkin Street  
 San Francisco, California 94102  
 (415) 557-4400

**Navy BRAC Caretaker Support Office**  
 1 Avenue of the Palms, Suite 161  
 Treasure Island  
 San Francisco, California 94130  
 (415) 743-4729

**Administrative Record File**  
 ATTN: Diane Silva, Command Records  
 Manager  
 NAVFAC Southwest  
 1220 Pacific Highway  
 Code EV33, NSDB Building 3519  
 San Diego, California 92132  
 (619) 556-1280  
 diane.silva@navy.mil

Administrative Record hours are 8 a.m. to 5 p.m. Monday through Friday. Documents may not be removed from the facility; however, they may be photocopied. Please contact Ms. Silva to make an appointment.

Site 32 documents are available in the information repositories and in the administrative record locations listed above. Other information such as meeting minutes and fact sheets related to Site 32 can be found on the Navy's website at [www.bracpmo.navy.mil](http://www.bracpmo.navy.mil). Select "Prior BRAC," then "Former Naval Station Treasure Island."

## PROJECT CONTACTS

**James Sullivan**

BRAC Environmental Coordinator  
 BRAC Program Management Office West  
 1455 Frazee Road, Suite 900  
 San Diego, California 92108-4310  
 phone: (619) 532-0966  
 fax: (619) 532-0983  
 james.b.sullivan2@navy.mil

**Ross Steenson**

Remedial Project Manager  
 San Francisco Bay Water Board  
 1515 Clay Street, Suite 1400  
 Oakland, California 94612  
 (510) 622-2445  
 rsteenson@waterboards.ca.gov

**Remedios Sunga**

Remedial Project Manager  
 Department of Toxic Substances Control  
 700 Heinz Avenue  
 Berkeley, California 94710  
 (510) 540-3840  
 rsunga@dtsc.ca.gov

**Melinda Garvey**

Remedial Project Manager  
 U.S. EPA, Region 9  
 75 Hawthorne Street  
 San Francisco, California 94105  
 (415) 947-4184  
 Garvey.Melinda@epamail.epa.gov

Attn. James Sullivan  
BRAC Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310



**Proposed Plan/Draft Remedial Action Plan for  
Installation Restoration Site 32  
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