



2nd/3rd Five Year Review at Former Naval Station Treasure Island



The United States (U.S.) Department of the Navy (DoN) is conducting the 2nd/3rd Five Year Review (FYR) for Former Naval Station Treasure Island (NSTI) in San Francisco, California, as required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

The purpose of the FYR is to determine whether the remedies for environmental cleanup selected in a Record of Decision (ROD) remain protective of human health and the environment. CERCLA requires a review every five years for remedies where contamination remains above levels that allow for unlimited use and unrestricted exposure.

This FYR will present the third CERCLA FYR conducted for IR Site 21, 27, and 30 and the second CERCLA FYR for IR Sites 6, 12, and 21. A brief description of the selected remedies under review, for each IR Site, is summarized in Table 1.0.

Table 1.0 – Former NSTI IR Site and Associated Remedies

Installation Restoration Site	Selected Remedies
IR Site 6 – Former Firefighting Training School	Excavation and off-site disposal of unsaturated zone soil, institutional controls (ICs), and groundwater monitoring.
IR Site 12 in the Gateview Arsenic/TPH Area	Soil excavation to reduce arsenic concentrations in groundwater and groundwater monitoring.
IR Site 21 – Site Vessel Waste Oil Recovery Area	Land Use Controls (LUCs) and groundwater and soil gas monitoring.
IR Site 24 – Dry Cleaning Facility	Excavation of soil, active remediation (groundwater treatment and in situ bioremediation), LUCs, and groundwater and soil gas monitoring.
IR Site 27 – Clipper Cove Street Range	Focused dredging, backfilling and implementing LUCs. Bathymetric surveys are completed every five years in support of the FYRs.
IR Site 30 – Daycare Center	Excavation, removal, and disposal of contaminated soil surrounding Building 502 and LUCs.

The Navy recognizes the need and importance to complete an analysis of Per- and Polyfluoroalkyl Substances (PFAS) at NSTI. Investigation of PFAS following the CERCLA process is ongoing at IR Site 6, 21, and 24. As a PFAS Remedial Investigation (RI) is still in process at these sites and all sites are in the pre-decisional phases of CERCLA for PFAS, it is generally not appropriate to assess current remedy protectiveness for PFAS since the nature and extent of risk is still being investigated. Once the PFAS RI human health and ecological risk assessment is completed, the Navy will evaluate any identified PFAS CERCLA risk in the context of the existing site remedies.

However, it is important to identify there are no potential human exposure pathways to PFAS at Former NSTI. Groundwater is non-potable at Former NSTI, and is not used as a drinking water

source. Additionally, remedies in place, including ICs, prevent exposure to PFAS that may be present in soil and groundwater at IR Site 6, 21, and 24.

The FYR is completed in accordance with CERCLA § 121 (c), as amended by the Superfund Amendments and Reauthorization Act and the national Oil and Hazards Substances Pollution Contingency Plan, Part 300.430 (f)(4)(ii) of the Code of Federal Regulations. The FYR is conducted in accordance with the following documents:

- *Comprehensive Five-Year Review Guidance* (EPA, 2001). Office of Emergency and Remedial Response. EPA 540-R-01-007. OSWER No. 9355.7-03B-P (EPA, 2001) and supplements (EPA, 2012a, 2012b, 2016)
- *Navy/Marine Corps Policy for Conducting Comprehensive Environmental Response, Compensation, and Liability Act Five-Year Reviews* (Navy, 2011)
- *Toolkit for Preparing Five-Year Reviews* (NAVFAC, 2013)
- *Defense Environmental Restoration Program (DERP) Management Manual Number 4715.20* (DoD, 2018)
- *Department of the Navy Environmental Restoration Program Manual* (Navy, 2018)

The previous FYR was completed in August 2020, in accordance with the guidance listed above. That document can be found on the TI Website at (https://administrative-records.navfac.navy.mil/Public_Documents/SOUTHWEST/TREASURE_ISLAND_NS/N60028_00321_1.PDF). The 2nd/3rd FYR will be signed and completed no later than August 8, 2025. The Final 2nd/3rd FYR will be made publicly available on this website. Table 1.1 provides a summary of upcoming completion dates.

Table 1.1 – Five Year Review Schedule

Task	Completion Date
Navy provided Draft Final RLSO and RTCs to agencies for review/concurrence.	3/17/2025
Navy Completes Admin Check of 2 nd /3 rd FYR	7/10/2025
Issue Signed Final 2 nd /3 rd FYR	8/8/2025
Public Notice of 2 nd /3 rd FYR Completion	8/11/2025

Notes: RLSO = Redline Strike Out; RTCs = Response to Comments; FYR = Five-Year Review