Summary of Environmental Remediation

Public Health Service Hospital District

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March 2003

Past actions of the U.S. Army caused environmental contamination of a number of sites within the Presidio. Prior to the creation of the Presidio Trust ("Trust"), the U.S. Army, in response to regulatory requirements under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended, investigated the Presidio's environmental conditions, prepared a series of remedial investigation reports, and completed broad-reaching but limited cleanup actions (i.e., limited largely to restricting land uses and long-term monitoring as the preferred cleanup method). Subsequent to the transfer of the Presidio to the National Park Service ("NPS") and later the Trust, the Trust assumed the Army's cleanup obligations and accepted responsibility for cleanup actions within both Area A, under NPS jurisdiction, and Area B under the Trust's jurisdiction. The Trust's cleanup responsibility is set out in two 1999 agreements, the *Memorandum of Agreement Regarding Environmental Remediation at the Presidio of San Francisco* among the Trust, Army, and NPS ("Presidio MOA"), and the *Memorandum of Agreement for Environmental Remediation of Presidio of San Francisco "Area A" Property* between the Trust and NPS ("Area A MOA").

The Presidio's environmental cleanup actions are subject to regulatory oversight and acceptance. Releases of hazardous substances into the environment are cleaned up under CERCLA and the state statutory counterpart, the Hazardous Substances Control Act; those cleanup actions are reviewed and approved by the California Environmental Protection Agency, Department of Toxic Substances Control ("DTSC"). The Trust is subject to a Consent Agreement with DTSC establishing responsibilities and procedures for cleanup of releases of hazardous substances and hazardous waste at the Presidio under CERCLA, the Resource Conservation and Recovery Act ("RCRA"), and counterpart State laws. The Consent Agreement identifies the Public Health Service Hospital area as one of nine operable-units Presidio-wide needing cleanup response action. Because CERCLA does not address pollution from petroleum hydrocarbons, the Trust addresses petroleum hydrocarbon pollution at the Presidio pursuant to State water quality and protection laws, and these cleanup actions are overseen and must be accepted by the California Environmental Protection Agency, Regional Water Quality Control Board, San Francisco Bay Region ("RWQCB").

In response to regulatory requirements, in March 2003, the Trust issued to the regulatory oversight agencies and the public the Presidio Trust Revised Feasibility Study Report for the Main Installation sites at the Presidio ("Revised FS"), which supplements and corrects deficiencies in the Army's former site investigations and response actions for 35 sites throughout the Presidio. Three of these sites – Graded Area 9, the Nike Missile Site (also known as Battery Caulfield), and the Nike Swale – are in or near the PHSH RFQ project area, and the Trust's Revised FS identifies proposed updated remedies for each of

the three sites. The remedy proposed in the Trust's Revised FS for these sites has been informally and preliminarily accepted in concept by DTSC, the regulatory oversight agency, and NPS, which must concur with remedy selection decisions under the Area A MOA. Although no remedy can be considered final until accepted by DTSC, conceptual agreement on environmental remedies proposed in the Revised FS has been reached between the Trust, NPS, DTSC and the Restoration Advisory Board ("RAB"), the public advisory group overseeing the Presidio cleanup actions.

Two other sites within the PHSH project vicinity – Landfill 8 and Landfill 10 – are also environmentally contaminated and require cleanup. In the mid-1990's, the Army had addressed remedial actions needed at several sites within the PHSH area in its CERCLA Record of Decision for the PHSH ("PHSH ROD") (U.S. Army 1995). The environmental remedies identified in the PHSH ROD may now be considered deficient by regulators to meet the updated planned land use needs since the Army departed the Presidio. To comply with CERCLA, the Trust in 2002, investigated soil and groundwater in Landfill 8 and Landfill 10 to determine if the remedies in the PHSH ROD are still protective of human health and the environment. Based on preliminary results, it is likely that additional cleanup actions will be required at these two landfill sites. The data report on the investigation will be available in approximately June 2003.

The approximate location of each remediation site is depicted on the appended figure, "Environmental Remediation Sites in the PHSH Area," and a brief description of the conditions and regulatory status at each site follows. The Trust plans to prepare remedy decision documents (i.e., Remedial Action Plans, known as RAPs) for the sites in late 2003 and 2004. The Trust's recommended remedies for these sites are subject to formal public comment and must be approved by DTSC before they can be implemented. In order to most efficiently bring environmental cleanup sites into planned reuse, the Trust generally expedites remedy implementation by preparing remedial design plans concurrent with the preparation and regulatory review of remedy decision documents. The Trust plans to use this approach at the PHSH sites so that, once approved by DTSC, remedies can be implemented by 2004 and no later than December of 2005.

Graded Area 9 "Landfill" – This site is a low lying area of fill created by the Army to construct a soccer field. With an estimated surface area of 150,000 square feet, the fill extends to a depth of about 5 to 6 feet with an estimated volume of 32,000 cubic yards. Sampling indicates very low contaminant levels at the site, and no further remedial action at Graded Area 9 for soil or groundwater has been proposed in the Trust's Revised FS. Consistent with the Vegetation Management Plan for the Presidio, future site stabilization plans following environmental remediation include restoration with native plants as part of recovery measures for the endangered San Francisco lessingia.

Landfill 8 – Just north of the former main hospital building (Bldg. 1801) and across Battery Caulfield Road from Graded Area 9, Landfill 8 is about 28,000 cubic yards of

soil and construction debris underlain by the former Marine Hospital Cemetery where the remains of hundreds of deceased merchant seamen are believed to be buried. The landfill is covered by an asphalt parking lot, soil and tennis courts, and the cemetery is believed to be below the fill material at a depth of about 9 to 10 feet, although graves may be shallower and intermingled with fill in places. Contaminants in the fill include metals, semi-volatile organic compounds ("SVOCs") and pesticides. In 2003, the Trust plans to revise the Army's 1995 PHSH ROD and select a revised remedy for the Landfill 8. Remedy implementation is scheduled for 2005. Consistent with the Presidio's Vegetation Management Plan, native plants will be restored on the majority of the site following cleanup action.

Landfill 10 – In the 5-acre area immediately southwest of the main hospital building and northeast of Lobos Creek, Landfill 10, the Presidio's largest landfill, contains about 140,000 cubic yards of soil, debris, and building demolition rubble. Groundwater quality is monitored at four wells, and investigations of the site are nearly complete to determine slope stability under various seismic conditions and potential groundwater threats. As with Landfill 8, the Trust expects to revise the Army's 1995 PHSH ROD and select an improved environmental remedy for Landfill 10 in late 2003. Remedy implementation, scheduled for 2004, will likely include slope cut-back for site stabilization, placement of native plants on the slope, and reconfiguration of the asphalt parking lot in concert with trail improvements.

Nike Missile Site – At the Army's former Nike Missile Facility, a series of subsurface storm drains are believed to be contaminated with metals and polynuclear aromatic hydrocarbons (known as "PAHs"). Sampling at five monitoring wells at the site has detected subsurface inorganic contaminants (i.e., metals). Cleanup action by the Trust is scheduled for 2004, and is expected to include removal of contaminated sediments in the storm drains. Groundwater monitoring for at least three years, and possibly longer, to confirm removal of contamination sources is likely to be required by the regulatory agencies.

Nike Swale – Immediately south of the Nike Missile Site, an area of riparian scrub vegetation, including native dune plants, willows and seasonal wetlands, receives runoff from the former Nike Facility site, and is likely contaminated due to transport of substances along subsurface drains that surface adjacent to and within the swale area. Trust sampling indicates possible PAHs in soil and sediment; additional site characterization data will ensure appropriate remediation measures are planned for this site. The expected environmental remedy, proposed in the Trust's Revised FS, includes excavation of contaminated soil and sediments and confirmation soil sampling to verify source removal. Environmental cleanup action at the site is scheduled for 2005.