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**CONCURRENCE WITH DRAFT FINAL EXPLANATION OF SIGNIFICANT  
DIFFERENCES, REVISED REMEDIATION GOALS FOR CHLORINATED  
VOLATILE ORGANIC COMPOUNDS, SITE 24**

01/06/2023  
CRWQCB - OAKLAND, CA

Approved for public release: distribution unlimited.



## San Francisco Bay Regional Water Quality Control Board

January 6, 2023

GeoTracker ID: [T10000007000](#)

U.S. Department of the Navy  
Attn: David Clark, Lead Remedial Project Manager  
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**Subject: No Further Comments on December 2022, Draft Final Explanation of Significant Differences – Revised Remediation Goals for Chlorinated Volatile Organic Compounds Installation Restoration Site 24, Former Naval Station Treasure Island, San Francisco, California**

Dear Mr. Clark:

Regional Water Board staff have reviewed the December 2022, *Draft Final Explanation of Significant Differences (ESD) – Revised Remediation Goals for Chlorinated Volatile Organic Compounds Installation Restoration Site 24, Former Naval Station Treasure Island, San Francisco, California* (Site 24 Record of Decision [ROD] ESD). This Site 24 ROD ESD revises soil gas remedial goals (RGs) for these chlorinated volatile organic compounds (CVOCs): cis-1,2-dichloroethene, tetrachloroethene, trichloroethene, and vinyl chloride. The revised RGs are in response to the site's protectiveness determination in the 2020 Second Five-Year Review, which concluded that the soil gas RGs for these CVOCs established in the 2015 Site 24 ROD/Final Remedial Action Plan were no longer protective due to recent changes in toxicity criteria and accepted methodology for assessing vapor intrusion risk.

Regional Water Board's comments have been addressed, and we have no further comments. We support the follow-up comments delivered to the Navy on December 28, 2022, by the Department of Toxic Substances Control. We look forward to the finalization of the Site 24 ROD ESD.

If you have any questions, please contact me at [jeff.white@waterboards.ca.gov](mailto:jeff.white@waterboards.ca.gov).

Sincerely,

Jeff White  
Water Resource Control Engineer  
Groundwater Protection Division

cc:

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