



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105  
SFD 8-3

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ALAMEDA POINT  
SSIC NO. 5090.3

December 6, 2006

Mr. Thomas Macchiarella, Code 06CA.TM  
Department of the Navy  
Base Realignment and Closure  
Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310

**RE: Draft Work Plan for Supplemental Remedial Investigation Sampling of Operable Unit 2C, Alameda Point**

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document, prepared by Bechtel Environmental, Inc., and submitted by the Navy on September 11, 2006. In general, the workplan has addressed the data gap problems which concerned us during review of the OU 2C Remedial Investigation Report. We sent an electronic copy of our comments to the Navy on November 16, 2006, and are enclosing a hard copy with this letter. We appreciate the opportunity to work collaboratively with the Navy and the other regulatory agencies in developing this workplan and thank Mr. Peck for setting up site walks to allow us to determine the sampling locations and for organizing the meetings to discuss the final deliverable.

Do not hesitate to call me at (415) 972-3029 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Anna-Marie Cook".

Anna-Marie Cook  
Remedial Project Manager

enclosure

cc list: Steve Peck, BRAC PMO SW  
Dot Lofstrom, DTSC Sacramento  
Erich Simon, SFRWQCB  
George Humphreys, RAB Co-Chair  
Karla Brasaemle, TechLaw Inc  
Suzette Leith, EPA  
John Chesnutt, EPA

## **EPA Review of the Draft Work Plan for Supplemental Remedial Investigation Sampling at Operable Unit 2C, Alameda Point**

### **General Comments:**

1. Please address the impact, if any, on the proposed soil gas sampling, from the ongoing six-phase heating removal actions at Building 5. Include a figure depicting the vertical and lateral area affected by the heating during the current and future removal actions together with the locations of the proposed soil gas samples.
2. Please describe more fully the scope of the proposed radiological removal action as it relates to Site 5, i.e. the storm/sewer segment running west of Building 5 to the Seaplane Lagoon and the lateral storm drain running from Building 5 to Site 26. Even though the workplan states that it will not address rad issues, the Remedial Investigation Report does need to include all information related to radiological cleanup, including the two areas mentioned above, in order to make a determination of whether further action is needed for the Feasibility Study.
3. Please be aware when drafting the Remedial Investigation Report and presenting the Human Health Risk Assessment, that the total risk for all contaminants must be included in addition to presenting the incremental risk. Thus the risk due to background inorganics must be included in the risk number representing total risk.

### **Specific Comments:**

1. Although the SAP states that there will be 100 subslab soil gas sampling locations, Appendix A1 and the SAP do not include a figure depicting the locations where soil gas samples will be collected. Please provide a figure with the soil gas sampling locations.
2. **Section 2.3.4. Water Quality, fourth paragraph:** Please remove the last sentence from this paragraph as it is incorrect. Groundwater with TDS less than 10,000 mg/l is considered a potential drinking water source and thus would be considered potentially suitable for domestic use.
3. **Section 2.5.2, Groundwater Contamination:** The text in this section and in Attachment A1 describes groundwater plumes 5-1, 5-2, 5-3, and 5-4, but these figures are not labeled on any of the figures. Figure A1-2 includes two of the plumes, but neither is labeled. Please provide one figure that includes all four groundwater plumes with labels.
4. **Section 3.11:** EPA would disagree with the assertion that the Surfactant Enhanced DNAPL extraction showed “excellent mass removal”. In our review of the workplan and subsequent study report we expressed concern that the initial subsurface mass of DNAPL

had been vastly underestimated. This underestimation was due 1) to lack of lateral and vertical subsurface characterization of the area prior to the pilot study, and 2) using concentrations from scant monitoring well data, rather than taking more representative discrete hydropunch data, to derive mass of DNAPL present. This concern was shown to be valid when BERC performed an in-depth lateral and vertical characterization of the subsurface in preparation for their Steam Enhanced Extraction (SEE) Pilot Study. They found concentrations of contamination two to three orders of magnitude higher than that used in the Surbec Pilot Study calculations. Thus, the extraordinarily high percentage removed during the Surbec Pilot Study is directly a result of underestimating the initial mass of contamination in the subsurface rather than a demonstration of the effectiveness of their treatment. Please revise this section and also include a description of the more successful BERC SEE Pilot Project for completeness. The BERC SEE pilot study helped to support the later use of six-phase heating for further DNAPL removal because it employs similar remediation techniques.

5. **Figure A1-16: Decision Logic for Installation of Permanent Groundwater Monitoring Wells:** It is unclear why all of the arrows from the boxes with text that begins, “With Active Involvement of the Regulatory Agencies...” exit those boxes and go directly to a box containing the text “No Further Remedial Investigation.” Since these boxes call for installation of new monitoring wells and/or adding contaminants of concern (COCs) to the Basewide Groundwater Monitoring Plan (BGMP), it appears that an intermediate box/action is needed. For example, the new well or the upgradient or downgradient well should be sampled at the same time the groundwater well in which the inconsistent results were detected. Then, the decision about adding COCs to the BGMP would require a separate box, with an arrow from this box to the no further investigation box
  
6. **Figure A1-17: Decision Logic for SWMU Step-Out Soil Sampling:** The decision logic needs to be revised. First, the decision, “Are there other soil data collected within 50 feet with results below criteria?” does not address the vertical extent of contamination. Second, the decision “Are results consistent with known nature and extent of contamination?” will not identify locations where the extent of contamination has not been defined. It is possible that constituents consistent with previous results could be detected above the comparison criteria; this would result in a “Yes” decision for question about consistency and would result in no further investigation even though the extent of contamination may not have been defined. It appears that the second question (after determining that results are above comparison criteria) should be replaced by a question that asks if the extent of contamination has been delineated. If the answer is Yes, then the question about consistency can be asked. If the answer is “No,” then the result should be to collect and analyze samples. Please revise the decision logic.
  
7. **Table A1-9, Monitoring Well Groundwater Data: Summary of Metals Exceeding Screening Criteria:** Results appear to be reported in micrograms per liter however, the

table header indicates that results are "reported in milligrams per liter. Please address this discrepancy.

### Comments on Evaluation Area 1

8. Although VOCs were reported above screening criteria at several discrete groundwater sampling locations (including, 057-006-014 and S052-2 through S052-4) in the southern portion of Evaluation Area 1, no monitoring wells or additional delineation is proposed in this area. Since these locations were only grab groundwater samples, it appears that a monitoring well is needed in this area. Please include a shallow (water table well) in this area.
9. **Section A1.1.2.1, Phase 2B and 3 Investigation, 1991 Groundwater Sampling, Page A1-7:** During the Phase 2B and 3 Investigation, the concentrations of arsenic (27.3 ug/L) and nickel (222 ug/L) in groundwater at M05-03 exceeded their respective screening criteria (i.e., the 95 groundwater percentile for arsenic [20.7 ug/L] and Cal-MCL for nickel [100 ug/l]) at M05-03; however, the last sentence of the first paragraph states that only VOCs were reported at concentrations exceeding the screening criteria. Please resolve this discrepancy.
10. **Section A1.1.2.1, Phase 2B and 3 Investigation, 1991 Groundwater Sampling, Page A1-7:** According to Table C-8 of Appendix C, SVOCs reported in groundwater at M05-3 during the Phase 2B and 3 Investigation include 1,2-dichlorobenzene (DCB); 1,3-DCB; 1,4-DCB; 2,4-dimethylphenol; 2-methylnaphthalene; bis(2-chloroethyl)ether and naphthalene. However, the discussion in the third paragraph of SVOC results for M05-3 indicates that phenol, 2,4-dimethylphenol, and bis(2-ethylhexyl)phthalate were reported in groundwater, and that bis(2-ethylhexyl)phthalate exceeded screening criteria. Please revise the discussion of groundwater results from M05-3 to be consistent with Table C-8.
11. **Section A1.1.2.5, Environmental Baseline Survey, 1995 Groundwater Sampling, Page A1-13 through A1-14:** The discussion of VOCs reported in groundwater at EBS Parcel 57 is incomplete. According to Table C-8, in addition to the VOCs mentioned in the discussion on Page A1-13, Phase 2B groundwater samples (i.e., 057-006-014 through -016) also contained 1,2-dichloropropane (1,2-DCP) at 1 to 2 ug/L), 2-butanone (39 J ug/L), benzene (0.6 XJ to 1 J ug/L), carbon tetrachloride (130 ug/L), chlorobenzene (19 ug/L), chloroethane (2 to 13 ug/L), chloroform (28 to 85 ug/L), chloromethane (4 J ug/L), ethylbenzene (31 ug/L), methylene chloride (2 to 5 ug/L), PCE (2 ug/L), toluene (12 to 69 ug/L), TCE (3 to 10 ug/L) and total xylenes (270D to 790D ug/L). Please revise the discussion of VOCs reported in groundwater in EBS Parcel 57 to discuss all VOCs reported during the Phase 2B groundwater sampling.
12. **Figure A1-2, Evaluation Area 1:** This figure does not include locations M05-19 or L05-07, which are discussed in the text of Section A.1.1.3.2. For completeness, please include

these proposed locations; if necessary, an asterisk or another symbol could be used with the well identifier to indicate that these wells may not be installed.

### Comments on Evaluation Area 3

13. **Section A1.2.3.1, Additional Work at IR Sites 4 and 5, 1992-1993 Soil Sampling:** The description sample locations B05PS-01 through B05PS-10 is not consistent with Figure A1-7 or Figure 3-1. For example, Figure 3-1 depicts the location of borings B05PS-01 through B05PS-05 to the north of the plating shop in or adjacent to the area labeled "Landing Gear," and borings B05PS-06 through B05PS-10 appear to be located along the industrial waste water drain in the northern portion of the plating shop. The discussion in Section A1.3.2.1 indicates that these samples were collected through the floor of the chromium and cyanide processing areas of the plating shop; however, Figure A1-7 depicts the location of the chromium and cyanide processing areas in the southern portion of the plating area. Please revise the text to be consistent with the figures

In addition, all of the soil samples collected in the vicinity of the chromium and cyanide eductor sumps and surge tanks, including confirmation samples from the cadmium removal action (Figure A1-7) were analyzed for cadmium only. Therefore, soil left in place in the vicinity of the surge tanks and eductor sumps may contain elevated levels of chromium and cyanide. This appears to be a data gap. Please discuss this data gap for chromium and cyanide in soil in the vicinity of the chromium and cyanide eductor sumps and surge tanks and propose sampling to address this data gap.

14. **Section A1.3.2.5, Supplemental Remedial Investigation Data Gap Sampling, 2001 Soil Sampling, Page A1-38:** The discussion of metals analysis performed on soil samples collected during Data Gap Sampling (2001) and the Cadmium Removal Action (2001-2002) is not consistent with Appendix A2. According to the analytical results, soil sampling locations S05-DGS-DP14, S05-DGS-DP17 through S05-DGS-DP20, S05-DGS-DP31 through S05-DGS-DP33, and S05-DGS-DP50 through S05-DGS-DP60 were analyzed for cadmium only; however, Section A1.3.2.5 indicates that soil samples from these locations were analyzed for cadmium, chromium, hexavalent chromium, and lead. In addition, many of the confirmation samples were only analyzed for cadmium, but the text states that confirmation samples were analyzed for cadmium, chromium, hexavalent chromium, and lead. Please revise the discussion of soil analysis to be consistent with Appendix A2.
15. **Section A1.3.2.6, Cadmium Removal Action, 2001-2002 Soil Sampling, Page A1-38 and A1-39; and Table A1-17, Metals in Soil Exceeding Screening Criteria:** The depth to which soil was removed at S05-EXC-X2Y2 and S05-EXC-X2Y2 is not reported consistently in Table A1-17 and Table C-4 of Appendix A2. According to Table A1-7, soil at 7 ft bgs was left in place; however, Table C-4 indicates that soil at 7 ft bgs was removed. Please clarify whether soil was excavated below 7 ft bgs at these locations, and

if so, whether confirmation samples were collected below 7 ft bgs.

16. **Section A1.3.3, Proposed Sampling Rational and Design, Pages A1-39 through A1-42; and Figure 2-4, Conceptual Site Model (CSM) for IR Site 5:** Figure 2-4 depicts the rinse tanks and floor drains of the plating shop area as possible release areas for solvents; however, Section A1.3.3 does not recommend VOC analysis at soil borings EA3SB28 through EA3SB35 which have been proposed for investigation of potential releases from the industrial drain lines of the plating shop. Please analyze samples from these locations for VOCs as well.

#### **Comments on Evaluation Area 4**

17. **Section A1.4, Evaluation Area 4:** The text does not include the data gaps associated with the Paint Mixing Room and the Battery Acid Shop that were identified during the site tour. Please add these data gap areas to the bulleted list in this section.
18. **Section A.1.4.3, Proposed Sampling Rationale and Design, Pages A1-45 and A1-46:** The text omits the Paint Mixing Shop; this area was identified as a data gap during the site walk. Please add the Paint Mixing Shop to the text in this section.
19. **Section A.1.4.3, Proposed Sampling Rationale and Design, Pages A1-45 and A1-46:** In addition, during the site tour, the Regulatory Agencies expressed concern about the extent of arsenic in the vicinity of boring 054-001-007, where arsenic was detected at 329 mg/kg. Two borings within 50 feet of this location should be included to evaluate the extent of arsenic in soil. Please revise the Work Plan to incorporate defining the extent of arsenic in the vicinity of boring 054-001-007.

#### **Comments on Evaluation Area 5 (soil and groundwater)**

20. **Section 1.5.2.3 Environmental Baseline Survey, 2001 Soil Sampling, Page A1-49 through A1-53:** According to Table C-1 of Appendix C, soil samples from borings 055-001-001 and 055-001-002 were not analyzed for metals; however, the discussion of soil sampling at Target Area 1 in EBS Parcel 55 indicates that metals were detected below screening criteria in these borings. Please resolve this discrepancy.

#### **Comments on IR Site 5 Data Gap Areas**

##### BUILDINGS 6 AND 282

21. **Section A1.7.1.1, Historical Use, Page A1-63:** The historical use of NAS GAP 01 is not discussed; however, the work plan recommends soil and groundwater sampling in this area. Please revise Section A1.7.1.1 to discuss materials stored at NAS GAP 01.

22. **Section A1.7.3.2, Previous Investigations, Page A1-69 and A1-70; and Table A1-14 Benzo(a)pyrene Equivalents in Soil Exceeding Residential Soil Screening Criteria:** The extent of soil containing PAHs above the screening criteria (0.62 mg/kg, B[a]P equivalent) has not been delineated in the vicinity of soil sample 030-S05-009. According to Table C-5 of Appendix A2, the B(a)P equivalent was reported at 12.8 mg/kg in an excavation soil sample collected from 0-7 ft bgs at 030-S05-009. Step out samples were not collected within fifty feet this location. Please identify this exceedance on Table A1-14 and in Section A1.7.3.2, and discuss how this data gap will be addressed.

Similarly, the extent of soil containing PAHs above the screening criteria has not been delineated to the east, west and north of soil sample C3S005B048. According Table A1-14, the soil sample collected from 4-8 ft bgs contained a B(a)P equivalent of 1,170 mg/kg. Step out samples were not collected. Please discuss how this data gap will be addressed.

#### **Solid Waste Management Units:**

23. **Section A1.9.3, Proposed Sampling Rationale and Design, Page A1-81; and Figure A1-11, Data Gap Buildings 6 and 282, and SWMUs OWS 006A, OWS 006B, NAS GAP 01, and UST(R)-02:** The work plan proposes collecting soil and groundwater samples on the upgradient (i.e., southeast) side of OWS 006B; however, this location may not adequately characterize a potential impact to groundwater. Please consider soil and groundwater sampling on the downgradient (i.e., northwest) side of OWS 006B, since this may better characterize possible impacts to soil and groundwater at OWS 006B.
24. **Section A1.9.3, Proposed Sampling Rationale and Design, Page A1-81 and Figure A1-14, SWMU OWS 010:** Similarly, the soil/hydropunch sampling location for OWS 010 is located crossgradient, not downgradient. Please move this sample location to the northwest corner of this OWS.

#### **APPENDIX A. Sampling and Analysis Plan**

25. **Appendix A, Section 2.1.1, Hollow-Stem-Auger Drilling, Page A2-1 and Section 2.1.10, Utility Survey, Page A2-7:** It appears that there is a contradiction in the description of field procedures in these two sections. The first sentence in the third paragraph of Section 2.1.1, Hollow-Stem-Auger Drilling, Page A2-1 states, "The first 5 feet bgs at the borehole location will be advanced with a hand auger to confirm the absence of underground utilities." Bullet 7 in Section 2.1.10, Utility Survey, Page A2-7, describes utility clearance protocol and states, "Physically clear the first 4 to 5 feet bgs adjacent to each boring using a hand auger prior to advancing the boring with the hollow-stem-auger or direct-push rig." In addition, since samples will be collected from

the first 4 to 5 feet, it is unclear these samples will be collected. Please revise the text to clarify utility clearance protocols for hollow-stem-auger and direct-push drilling. Please also provide necessary modifications to the soil sampling methods if samples will be collected by hand auger in Section 2.1.2.

26. **Appendix A, Section 2.1.1, Hollow-Stem-Auger Drilling, Page A2-2:** It is unclear how water used to flush the borehole will be captured and contained since a conductor casing is not specified. In addition, since grout is usually added as the augers are removed, it appears that there will not be an open borehole to flush. Please explain how borehole flushing and containment of the water will be accomplished or delete this step.
27. **Appendix A, Section 2.1.6, Monitoring Well Construction, Page A2-4:** It is not clear how shallow monitoring wells will be constructed. The third and fourth paragraphs in this section specify monitoring well construction details for the proposed wells, including the following: "The wells will be screened from approximately 2 feet above the water table to 8 feet below the water table."; "The filter pack will extend at least 2 feet above the screened interval"; "a 2-foot thick transition seal of #30 sand will be placed above the sand filter pack..."; and "a minimum 3-foot-thick annular seal consisting of bentonite pellets...will be placed above the transitional sand. The remaining borehole annulus will be filled with a cement/bentonite grout to a depth of approximately 3 feet bgs." Table 1-2 indicates that the target groundwater sampling depth interval for selected new wells is 10-15 feet bgs. If groundwater is encountered at shallow depths closer to 10 feet bgs, completion of the well based on these specified well construction details is not possible. Please revise these well construction details to accommodate the construction of shallow wells, if field conditions warrant.
28. **Appendix A, Section 2.2.1, Soil Sampling Procedures, Page A2-8:** Use of a scoop to collect soil samples (Step 2 of the sampling procedure) conflicts with Quality Assurance Project Plan (QAPP) Worksheet 19, which specifies that samples will be submitted in 6 inch stainless steel, brass, or acetate liner. Please resolve this discrepancy.
29. **Appendix A, Section 2.2.2, Groundwater Sampling Procedures, Page A2-9:** The procedures do not specify that the flow-through cell will be disconnected before samples are collected. Groundwater samples should not be collected from a flow-through cell since turbulence in the cell can result in oxidation of metals and turbulence and/or solar heating can result in volatilization and photodegradation of VOCs. The resulting sample would not be representative of aquifer conditions. Please revise the procedures to specify that the flow-through cell will be disconnected before gloves are changed prior to sample collection.
30. **Section 2.2.3, Subslab Soil Gas Sampling Procedures, Page A2-11:** Step 4 calls for folding over sampling line prior to disconnection of the pump, but this will still allow air to enter the tubing. One way that this could be minimized is to use connect the purge

pump to one branch and the Summa canister to the other branch of Y-shaped tubing with a central valve; when the position of the valve is changed, different branches of the tubing can be purged. This would allow purging and sampling without removing any equipment and filling the tubing with air. Please change the sampling procedure to specify use of Y-tubing with a central valve and to specify purging each branch of the tubing.

31. **Appendix A, Section 2.2.4.1, 25-Hour Groundwater-Elevation Study, Page A2-12:** The last sentence in the third paragraph of this section states, "In addition, the results of the general water chemistry parameters collected prior to each round of potentiometric-surface measurements will be used to evaluate tidal influence." It is unclear whether these general water chemistry parameters will be the same as those specified during purging the monitoring wells or whether they will be collected from the temporary piezometers and monitoring wells as a part of this aquifer study. Further, only pressure transducers are specified in the text, although downhole probes/data loggers are available with the capability to monitor water quality parameters as well as pressure. Please clarify which water chemistry parameters will be measured as well as how and when they will be collected.
32. **Appendix A, Section 2.3, Sample Handling and Custody, Page A2-14 and Section 2.3.4, Sample Documentation, Page A2-15:** This section describes sample handling and custody requirements but does not include examples of sample labels, custody forms, and sample custody logs as required by EPA Requirements for Quality Assurance Project Plans, QA/R-5. Please include these examples in the next version of the Sampling and Analysis Plan.
33. **Appendix A, Section 2.4, Analytical Methods, Page A2-17:** The analytical laboratory is not specified as required by EPA Requirements for Quality Assurance Project Plans, QA/R-5. Please provide the name(s) of the analytical laboratory(ies) selected for this project in the next version of the Sampling and Analysis Plan.
34. **Appendix A, QAPP Worksheet 22, Field Equipment Calibration, Maintenance, Testing, and Inspection and Section 2.1.2, Direct-Push Drilling, Page A2-2:** The second bullet in section 2.1.2 states that "Organic vapor readings of the drill cuttings will be collected using a photoionization detector (PID) or organic vapor analyzer," but this conflicts with QAPP Worksheet 22. This worksheet includes information on a flame ionization detector but does not contain any information about PID calibration, maintenance, testing, and inspection. Please either modify QAPP Worksheet 22 to include PID information or modify the text in Section 2.1.2 to correct this discrepancy.
35. **Appendix A, Table 1-3, Supplemental Remedial Investigation Activities and Rationales for OU-2C: Soil and Discrete Groundwater Samples, Pages 2 and 3, and Table 1-7, Data Quality Objectives for Oil/Water Separators and Underground Storage Tanks at OU-2C, Page 1:** The Soil Sampling Depth Intervals column in Table

1-3 indicates soil samples will be collected from depths of 0-0.5, 2-4, and 4-6 feet bgs for the oil/water separator and underground storage tank areas. Step 7 of Table 1-7 indicates "soil samples will be collected from each boring (0 to 2, 2 to 4, and 4 to 8 feet bgs)." Please resolve this discrepancy.

36. **Appendix A, Table 1-3, Supplemental Remedial Investigation Activities and Rationales for OU-2C: Soil and Discrete Groundwater Samples, Pages 3 and 4, and Table 1-8, Data Quality Objectives for SWMUs at OU-2C, Page 1:** Similarly, the Soil Sampling Depth Intervals column in Table 1-3 indicates soil samples will be collected from depths of 0-0.5 and 2-4 feet bgs for the solid waste management unit (SWMU) areas. Step 7 of Table 1-8 indicates "soil samples will be collected from each boring (0 to 2 and 2 to 4 feet bgs)." Please resolve this discrepancy.

#### **Comments on Attachment A2 (CD with data tables)**

37. **Table C-1, Site 5 Soil and Other Matrices Sampling Summary:** According to Table C-1, SVOC analysis was performed on soil samples collected at a depth of 4-4.5 ft bgs from borings 057-001-001, -002 and -003; however, there are no analytical results in Table C-5 for SVOCs at these sample locations. Please provide the results.
38. **Table C-8, Complete Analytical Results for OU-2C Groundwater Samples:** The table notes do not define the qualifiers BWJ, EJ, X and XJ which were used for groundwater samples collected during the Environmental Baseline Survey. For example, results for thallium (2.3 ug/L), iron (370,000 ug/L), and nickel (1,090 ug/L) were qualified BWJ, EJ, and EJ, respectively in hydropunch sample 057-006-014. In addition, 1,2-DCE was reported at 0.7 ug/L with an X qualifier in sample 057-006-014 and benzene was reported at 0.6 ug/L with an XJ qualifier in sample 057-006-015. Please define all qualifiers in the table notes.

#### **Appendix C**

39. **Appendix C, Page C-1:** The last sentence of the first paragraph reads, "The wastes generated will include soil cuttings from soil borings, disposable personal protective equipment (PPE), and equipment-decontamination water." Groundwater monitoring well sampling will also generate purge water as investigation derived waste. Please revise this sentence to include purge water from monitoring wells.

#### **Minor Comments:**

1. **Table A1-10, Metals in Discrete Groundwater Samples Exceeding Screening Criteria and Section A1.1.2.1, Additional Work at IR Sites 4 and 5, 1992 Groundwater Sampling, Page A1-9:** According to Table A1-10, hexavalent chromium

was reported at 9,350 micrograms per liter (ug/L) in ground water at B05WT-01; however, the discussion in the last paragraph on page A1-9 indicates that hexavalent chromium was measured at 9,530 ug/L. Please resolve this discrepancy.

2. **Appendix A, Section 2.1.9, Groundwater Monitoring Well Sampling, Page A2-6:** The last sentence in the first paragraph of this section incorrectly states "Monitoring well construction details of existing wells are presented in QAPP Worksheet 15-groundwater." It appears that these details are presented in Table 2-1. Please revise the quoted statement with the correct reference.
3. **Table C-5, Complete Analytical Results for Site 5 Soil Samples:** The result for lead (<0 mg/kg) at boring 261-01 appears to be a typographic error. Please correct this entry.