



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 25, 2000

Mr. Richard Mach
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
BRAC Office
1220 Pacific Highway
San Diego, CA 92132-5190

RE: EPA Review of Navy Responses to Comments on the Draft Field Sampling Plan (FSP) and Quality Assurance Project Plan (QAPjP), for Phase I Groundwater Data Gaps, Hunters Point Shipyard

Dear Mr. Mach:

EPA has completed its review of the Navy's responses to EPA comments on the draft FSP and draft QAPjP for the Phase I Groundwater Data Gaps sampling effort. This review focused on the Parcel D groundwater sampling effort. In general, EPA's comments have been adequately addressed with a few exceptions which are presented in an attachment to this letter.

Should you have any questions about this letter, please contact me at (415)744-2409.

Sincerely,

A handwritten signature in black ink, appearing to read "Claire", with a long, sweeping horizontal line extending to the right.

Claire Trombadore
Remedial Project Manager

cc: Sheryl Lauth, EPA
Adam Klein, Tech Law
Chein Kao, DTSC
Brad Job, RWQCB
Jason Brodersen, TtEMI
Julie Crosby, Navy
Dave DeMars, Navy
Amy Brownell, City of SF
John Chester, City of SF

EPA Comments on Navy Responses to EPA Comments on the Phase 1 Groundwater Data Gaps

1. General Comments Overall, RTC #3: The Navy did not perform video logging of the B-zone monitoring wells. EPA is unclear how the Navy can be certain about the internal condition of a groundwater monitoring well if it did not video log it. Please clarify.
2. General Comments Overall, RTC #6: This comment expressed concern that there may not be enough additional B-zone wells planned in locations where the Bay Mud Aquitard is absent. EPA's contractor, TechLaw is currently reviewing the Parcel D RI and FS in order to gain a better understanding of the Bay Mud Aquitard distribution at Parcel D, and in order to evaluate the adequacy of the data gaps sampling program. Therefore, at this time, EPA has no comments regarding this RTC.
3. General Comments Overall, RTC #7: This RTC appears adequate, and the Navy has clarified that RU-D1 was proposed at the March 16, 2000 Parcel D groundwater meeting. However, there is no mention of RU-D1 in the meeting notes from the March 16, 2000 meeting. Was it on a GIS figure. Please clarify.
4. Specific Comments to the FSP, RTC #7: This RTC does not appear adequate. The RTC indicates that the Navy will screen the B-aquifer wells to the bottom of the B-aquifer. To address much of this comment, the Navy refers to their RTC to DTSC's comment #5 to the FSP. In particular, the Navy indicates that they will not be drilling pilot borings before drilling B-aquifer wells, and will not be performing continuous coring. Instead, the Navy has indicated that they will collect soil samples at 5-foot intervals in the A-aquifer and Bay Mud Sediments and at 10-foot intervals in the B-aquifer for lithologic characterization. It is not clear how the Navy will determine where the bottom of the B-aquifer is if they are only sampling soil at 10-foot intervals. Furthermore, at locations where borings have been installed for previous locations, the Navy indicates that they will not be collecting any soil samples for lithologic characterization. TechLaw is currently evaluating the locations of the proposed monitoring wells to determine if there is sufficient existing lithologic data, or if this approach will result in data gaps remaining unfilled.