



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

May 1, 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 and Comment, Draft September 1999 Quarterly Groundwater Sampling Report for Parcel B, Hunters Point Shipyard, February 29, 2000

Dear Mr. Mach:

On February 29, 2000, the Navy provided EPA with a copy of the Draft September 1999 Quarterly Groundwater Sampling Report for Parcel B, Hunters Point Shipyard for our review. The transmittal letter requested that EPA submit comments within 60 days. EPA comments on the document are provided as 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 horizontal flourish extending to the right.

Claire Trombadore  
Remedial Project Manager

cc: Chein Kao, DTSC  
Amy Brownell, City of SF  
Brad Job, RWQCB  
Jason Brodersen, Tetra Tech  
Adam Klein, Tech Law

500 441 15 0 12

7/15/00

## ATTACHMENT

### EPA Comments on the Draft September 1999 Quarterly Groundwater Sampling Report Parcel B, Hunters Point Shipyard

1. According to the monitoring well sampling sheets presented in Appendix C of the Report, water levels were not measured during the sampling of the following Parcel B monitoring wells: IR06MW45A, IR07MW25A, IR07MW28A, IR07MW26A, IR10MW33A, IR25MW17A, UT03MW11A, IR26MW41A, IR61MW05A and IR10MW28A. The water level measurements presented on the sampling sheets for these wells were collected on August 31, 1999, while these wells were sampled between September 1 and September 9, 1999. According to the RAMP, "Several preliminary well measurements should be made prior to initiating sampling of the well. These include determining water level...and calculating purge volumes" (Section 2.3 of the Groundwater Sampling Standard Operating Procedure (SOP 010), Appendix A of the RAMP). Because water levels fluctuate over time, water levels should be measured in the monitoring wells immediately before initiating sampling, not several days before sampling. According to Section 2.4, page 10 of SOP 010, "Samples should be collected as soon as the well recovers." The exception to this is for volatile organic compound (VOC) and total petroleum hydrocarbon (TPH) - purgeable samples, which should be collected as soon as there is enough water present in the well to collect a sample. While no criteria is presented in SOP 010 for determining when the well has recovered, a value of 80% of the thickness of the initial water column is typically used as a criteria for well recovery. Therefore, it is necessary to measure water levels immediately before initiating purging, and immediately after purging and before sampling, in order to verify that the well has recovered. The Navy should ensure that these water level measurements are collected during future sampling events, in order to verify that the sampling is performed in accordance with the RAMP.
2. The laboratory reporting limit for Aroclor-1221 is 0.2  $\mu\text{g/L}$ , while the applicable screening criteria for this analyte for the On/Off-Site Migration Monitoring Wells is 0.19  $\mu\text{g/L}$ . This is the only analyte which had a reporting limit that exceeded its applicable screening level. In Section 3.1.2, page 6 of the Report, it is stated that "Aroclor-1221 was reported as non-detected at a quantitation limit of 0.2  $\mu\text{g/L}$  in the sample collected from well IR07MW28A. Since the quantitation limit only slightly exceeds the screening level (0.19  $\mu\text{g/L}$ ), this is not considered a detected exceedance." However, EPA has not concurred with this approach. Additionally, the result for the sample collected from well IR07MW28A is shown as bold in Appendix B, indicating that this is an exceedance of the applicable screening criteria. Conversely, the analytical result for the sample collected from well IR18MW21A also shows non-detect at a quantitation limit of 0.2  $\mu\text{g/L}$ , but is not listed in bold in Appendix B. Let's discuss this at a future BCT meeting to ensure that all parties are in agreement with the Navy's approach to the Aroclor-1221

quantitation limit issue for future quarterly monitoring reports. Further, the agreed upon approach should be thereafter applied uniformly to all of the analytical results of future quarterly monitoring reports.

3. Section 3.2, Data Quality, does not include a table evaluating the precision of the duplicate samples, and does not indicate which sample stations had duplicate samples collected. Additionally, the Data Quality section does not discuss analytical results that are qualified, such as the chromium results for the samples collected from well IR07MWS-4. For future quarterly monitoring reports, the Navy should include a table in the Data Quality section which presents an evaluation of the precision of duplicate samples, and should include a discussion in the Data Quality section concerning analytical results that are qualified.
4. Section 3.4 of the Report discusses the groundwater samples that contained chemical concentrations that exceeded appropriate trigger levels. The fourth sentence of this section states that "In accordance with the RAMP, a letter was sent via email to the BCT on December 13, 1999 stating all exceedances at well IR26MW41A." However, Section 2.3.2 of the RAMP states that "If the trigger level is exceeded for any analyte, the Navy will take the following actions: For initial trigger value exceedances, (1) inform the BCT of the exceedance within 10 business days...". IR26MW41A was sampled on September 7, 1999. Groundwater sample analytical results are typically available within 14 to 21 days after sampling. Given that the Navy informed the BCT of the sample exceedances on December 13, 1999 (approximately 96 days after sampling occurred), it is likely that the Navy did not act in accordance with the RAMP. The Navy should ensure that the BCT is informed of future sample exceedances within 10 days of receiving sample analytical results, in order to ensure that the Navy is in compliance with the RAMP. Further, the BCT should discuss the RAMP resampling requirements at a future BCT meeting to determine whether or not revisions are appropriate. Specifically, the RAMP requirements about post exceedance resampling may be not be appropriate for every contaminant/monitoring well exceedance. The Navy may want to consider revising the requirements to include a meet and confer with the BCT to determine when and what resampling of groundwater is appropriate to meet the goals of the Parcel B Record of Decision. In addition, EPA would like to be informed of potential exceedances prior to data validation so that we are aware of any potential problems at the earliest possible time. EPA understands that the validated data will be the official data set for the groundwater sampling events.
5. The sample collected from sample station IR18MW21A had a zinc concentration which exceeded the applicable screening criteria, and therefore this analytical result should be shown in bold in Appendix B. Additionally, this result should be discussed in Section 3.1.2, Analytical Results for On- and Off-Site Migration Monitoring Wells.
6. VOC monitoring. Can we discuss the scope of the VOC monitoring at a future BCT meeting. Per the ROD, EPA is concerned as to whether or not the concentration of vinyl chloride (VC) in groundwater in the vicinity of IR-10 is increasing. The BCT would then

review any increases in VC or other VOCs to further evaluate potential threats to future users via the air pathway. Is the data the Navy collected at the one VOC monitoring well in September 1999, sufficient to understand and evaluate changes in potential air pathway threats? Also, is the detection limit the Navy used for vinyl chloride low enough?

7. The cover page of the Draft report is incorrectly dated February 29, 1999 as opposed to 2000. If the Navy decides not to revise the draft report but to simply issue a response to comments, EPA requests that the Navy provide a corrected cover page for EPA's file copy of this draft deliverable.
8. EPA appreciates the Navy including the groundwater sampling events and reporting in its April 27, 2000 proposed revisions to the FFA schedule. While EPA is still reviewing the details this proposed schedule, we support the addition of the groundwater sampling at Parcel B to the Navy's master schedule.
9. EPA would be interested in having its contractor, Tech Law, Inc. attend and field QA a future groundwater monitoring event. Please contact Adam Klein at (415) 281-8730 to schedule this.