



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

May 1, 2000

Mr. Richard Mach  
Southwest Division Naval Facilities  
Engineering Command  
1220 Pacific Highway  
San Diego, CA 92132-5180

**SUBJECT: IDENTIFICATION OF THE SEVEN STEPS OF THE DATA QUALITY  
OBJECTIVES PROCESS PHASE I GROUNDWATER DATA GAPS INVESTIGATION  
HUNTERS POINT SHIPYARD**

Dear Mr. Mach:

The Environmental Protection Agency (EPA) has completed review of the subject document. Our comments are included in Attachment 1 and were submitted via e-mail on May 1, 2000. If you have any questions regarding these comments, please call me at (415) 744-2387.

Sincerely,

A handwritten signature in cursive script that reads "Sheryl Lauth".

Sheryl Lauth  
Remedial Project Manager

cc: Mr. Chein Kao, DTSC  
Mr. Brad Job, RWQCB  
Mr. Jason Broederson, TTEMI  
Ms. Karla Braesemle, Weston  
Ms. Claire Trombadore, EPA  
Mr. Adam Klein, Tech Law

2000 MAY -8 10:00  
EPA OFFICE

**COMMENTS ON THE IDENTIFICATION OF THE SEVEN STEPS  
OF THE DATA QUALITY OBJECTIVES PROCESS  
PHASE I GROUNDWATER DATA GAPS INVESTIGATION  
HUNTERS POINT SHIPYARD**

1. **I, Step 3.** Please consider the situation where a well may be damaged (bent) below the ground surface such that a water level probe can be used, but a bailer or pump cannot be used in the well. This has happened on sites where the surface casing was bumped or where subsurface excavation damaged the well casing, but did not impact the surface casing. It is not clear how subsurface damage to a well casing will be assessed.
2. **II, Step 2.** Specify the decision that the top of casing survey is intended to address.
3. **II, Step 4.** USEPA has previously requested that water level measurements be taken at the same tidal stage. Please document the tidal stage when the first set of water levels is taken and then take the second round of measurements at the same tidal stage. Also, note that all water level measurements should be taken on the same day; this is not clearly specified. The meaning of the last sentence is unclear; is it intended to refer to the top of casing survey?
4. **II, Step 5.** Please explain why and under what circumstances utility lines will be repaired. Since historic data was also influenced by utility line leaks, the rationale for repairing utility lines is unclear. Also, the reason for spending money to repair utility lines is not clear; it might be better to abandon them. This issue needs to be addressed in Step 2, because the decision is only to identify the current potentiometric surface; given this decision, the condition of the utility lines is irrelevant.
5. **II, Step 5.** If measurements are taken at a different tidal stage than when historical data was collected, flow directions may differ in tidally influenced areas. Is it possible to identify the tidal stage for historical data? If not, the comparison of flow directions with historical data may not be relevant. The decision rules should reflect this problem.
6. **III, Step 3.** The second paragraph (beginning "validated...") does not contain a verb. What will the validated data be used for? The other entries in this column seem to specify more than inputs to the decisions.
7. **IV, Step 5.** The cases where the boundary of the plume must be expanded are not fully addressed. If contaminants are detected in new wells that are in areas where there were no historic wells, or where historic wells were distant, this may not indicate migration of the plume, but rather would indicate better definition of the plume boundary (e.g., new wells may be installed in upgradient or crossgradient directions that would result in better

definition of a plume boundary). Please expand the decision rules to include this additional case.

8. Please explain why water levels will not be used to create a new B-aquifer potentiometric surface map.