



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

December 8, 2000

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

**SUBJECT: DRAFT SAMPLING AND ANALYSIS PLAN PARCEL C SOIL SITE
DELINEATION, HUNTERS POINT NAVAL SHIPYARD**

Dear Mr. Mach:

The Environmental Protection Agency (EPA) has completed review of the subject document dated November 16, 2000. Our comments are included in the enclosure. The Navy did a good job of incorporating the verbal comments provided by EPA during previous meetings and the agreements reached on the other Parcel specific Sampling and Analysis Plans. As a result, EPA has very few comments on this document. 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

Enclosure

cc: Mr. Chein Kao, DTSC
Mr. Brad Job, RWQCB
Mr. Mike Wanta, TTEMI
Ms. Karla Braesemle, Weston
Mr. John Chester, City of SF
Ms. Julie Crosby, Navy
Mr. Dave DeMars, Navy

US EPA's COMMENTS ON THE DRAFT SAMPLING AND ANALYSIS PLAN PARCEL C SOIL SITE DELINEATION, HUNTERS POINT NAVAL SHIPYARD

1. EPA's QAMs office is currently reviewing the Navy's proposal to re-sample areas where PAH detection limits are above the PRGs. Our office (Joe Eidelberg) has been consulting with the Navy's Quality Assurance office and will review the proposal and provide comments under a separate cover letter (anticipated by December 18, 2000) that will be applicable to all the Parcels. Once an agreement is reached on the methodology for the PAH re-sampling, please provide a more detailed discussion of the conditions for re-sampling and identify which remediation areas are being sampled to address this issue.

2. Some of the planned analysis shown on Table 1 differ from those presented on the table developed for discussion at the October 3, 2000 meeting. Please correct the table or provide rationale for excluding the planned analysis for the following:

IR-25: Site 25-1: Chromium and Chromium VI and Magnesium were originally included in 25-1 and are now included in 25-2.

IR28: DM 8934: Chromium and Chromium VI and Magnesium were originally included

3. Please specify the method to be used for the CLP SVOC analysis for PAHs. Is this method based on EPA method 8310? If so, interference may limit the usefulness of these samples. EPA method 8270 with selected ion monitoring (SIM) is more reliable and has much lower detection limits. EPA has recently been involved with split sampling for a PAH site in Daly City, where the EPA split sample 8270 SIM data is accurate and useful, but the method 8310 data is unreliable because of interference, retention time shifts, chromatograms that look like hills or humps, etc. These problems have resulted in elevated detection limits and rejection of much of the data. The 8310 data has been found to be subject to both false positives and false negatives.

Note that the text in section 3.1.4 of the Sample Analysis Plan specifies that EPA modified method 8270C will be used for the PAH analysis (not CLP SVOCs). Please resolve this apparent discrepancy.

4. Table 1A in FSP. Footnote 1 should not be cited for the Analytical Holding time for Chromium IV. Also, the holding time before extraction is incorrect for TPH purgeables (should be 14 days, not 114 days).

5. FSP, Section 3.1.3. Explain how it is known that the ENCORE sample containers are clean if an equipment rinse blank will not be taken.

6. FSP, Section 4.0. Because the blind field duplicates will be a separate sample, and will not be homogenized with the primary sample, there will be differences between the sample result and

the duplicate result. This may exceed the allowable RPD.

7. FSP. The FSP does not specify the information to be recorded in the field log. This should be specified in the FSP. At a minimum, this information should include (but is not limited to): the date, name of sampler and any assistants, name of logger, sample location, sample ID, any screening data collected, and a description of each soil sample, including whether there is visible evidence of contamination. Sample descriptions should indicate estimated percentages of sand, silt and clay, and whether any material other than soil is present (e.g., grass, roots, wood, debris, etc.).