



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

May 10, 2001

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 the Draft 6th Quarterly Groundwater Sampling Report, Parcel B, Hunters Point Shipyard

Dear Mr. Mach:

EPA has reviewed the above referenced document. Our comments are presented in an attachment to this letter.

If 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
Brad Job, RWQCB
Mike Wanta, TtEMI
Tom Shoff, TtEMI
Dave DeMars, Navy
Rich Pribyl, Navy
Karla Brasaemle, Tech Law
Amy Brownell, City of SF
John Chester, City of SF

**EPA REVIEW AND COMMENT
DRAFT JANUARY TO MARCH 2001 SIXTH QUARTERLY GROUNDWATER
SAMPLING REPORT, PARCEL B
HUNTERS POINT SHIPYARD**

General Comments

1. EPA's previous comment on the Fifth Quarterly Groundwater Sampling Report (5th QSR) was not addressed. EPA requested that groundwater contours from both the 5th QSR and the Sixth Quarterly Groundwater Sampling Report (the Report) be included in the next sampling event report. This request was made to better understand the groundwater mounding near IR25 and IR06. Please include both the 5th and 6th quarterly sampling event contours in the next Quarterly Groundwater Sampling report for Parcel B.
2. Evaluation of changes in groundwater elevations in two POC monitoring wells between the 5th and 6th quarter sampling events at IR10MW31A1 and IR07MW19A, found that groundwater at these wells appears to be at a lower elevation relative to the other POC monitoring wells. Groundwater elevations in the other POC monitoring wells have risen. This is most likely due to the location of these two wells relative to the tidally influenced zone (TIZ). This information is of interest because it may provide evidence that POCs located more inland of the TIZ groundwater elevations behave differently than those located within the high tide line in the tidal mixing zone. Please revise the text to include an evaluation of POC groundwater elevation in the context of the tidal mixing zone.

Specific Comments:

1. **Section 1.0 Introduction, Page 1:** The description of the POC Monitoring wells is unclear and differs from the Remedial Action Monitoring Plan dated August 19, 1999 (the RAMP). The RAMP describes the approach for monitoring groundwater at Parcel B as ensuring "that National Ambient Water Quality Criteria (NAWQC), Hunters Point groundwater ambient levels (HGAL) which ever is higher, are not exceeded at the high-tide line of the Parcel B tidally influenced zone (TIZ), which is the point of compliance (POC)." However, the text of this section of the Report states that the POC monitoring wells are located near the inland edge of the TIZ. The high tide line of the TIZ and the inland edge of the TIZ are different. Please revise the text to reflect the RAMP definition that the NAWQC and HGALs are not exceeded at the high-tide line of the Parcel B TIZ.
2. **Section 3.2.7, Low-Flow Groundwater Sampling, Page 8:** The Monitoring Well Sampling Sheet for low flow purging for monitoring well IR07MWS-4 could not be found in Appendix B. The Monitoring Well Sampling Sheet for traditional purging and sampling of monitoring well IR07MWS-4 is included in the Report but the low flow sheet is not present. Also, Table 7 indicates that the date on which the traditional purging and sampling of this well took place was January 17, 2001 while the Monitoring Well Sampling Sheet indicates that the date was January 16, 2001. Also, Table 7 indicates that the date the low flow purging took place was also on January 17, 2001. Please revise the report to include the well sampling sheet for low flow purging of well IR07MWS-4 and

correct the discrepancy between the dates on the Monitoring Well Sampling Sheet and Table 7.

3. **Section 3.3, Data Quality, Page 9:** The results of field duplicate analyses on groundwater samples collected during this sampling event are not discussed in the Data Quality Section of the Report. The results of field duplicates and their corresponding primary samples are not presented as they were in the past in Appendix E. Also, the Report does not calculate or discuss the relative percent differences (RPD) in sampling results. Please revise the Report to include calculation of RPD for duplicate results and discussion of any RPD criteria exceedences. Also, please continue to include the results of field duplicates and their corresponding primary samples in Appendix E.
4. **Table 2, Summary of Wells Sampled and Analyses Performed:** CLP Metals were not sampled in one of the POC monitoring wells. IR26MW45A was not sampled and analyzed for CLP Metals. Please revise the Report to explain why this POC well was not analyzed for CLP Metals as required by the RAMP.
5. **Table 5: Comparison of Trigger Level Criteria:** Table 5 does not include the comparison criteria for TPH-d and TPH-g of 1,250 ug/L as required by the RAMP. Please include this comparison criteria in Table 5 of the Report. If a change in this requirement was made, please note this in the text.
6. **Table 5: Comparison of Trigger Level Criteria:** The note "m" for Table 5 states "POC and Sentinel well trigger levels for trichloroethene were reduced from 200 ug/L and 2,000 ug/L, respectively, as listed in the Parcel B RAMP, to 85 ug/L because trichloroethene criteria are human-health based." Table 5 lists 114 ug/L rather than 85 ug/L. Please correct this discrepancy.
7. **Figure 3:** IR10MW14A is not included on Figure 3. Please include this monitoring well on the map until a decision regarding the disposition of this well is made.