



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, CA 94105

February 28, 1990

Commanding Officer
Naval Station Treasure Island
ATTN: Kam Tung, Hunters Point Annex
Building I (Code 70)
San Francisco, CA 94130-5000

Dear Mr. Tung:

Enclosed are EPA's comments on the ground water sampling reports for IR Sites 10 and 11. In addition to the comments presented in the attachments, we suggest two revisions to Section 7.0 of both reports.

First, the laboratory contamination appears to be greater than what would normally be expected, based on normal laboratory protocol. We believe the laboratory contamination issue needs to be investigated further to understand why this level of contamination exists. It may be acceptable to evaluate one additional round of ground water analyses prior to beginning this investigation.

Second, the reports indicate that GC methods will be implemented for those organic constituents detected by GC/MS methods. We feel that samples should continue to be analyzed by GC/MS until unknown compounds have been identified. GC methods may not be sufficiently accurate to detect the tentatively identified compounds.

Please refer to the attachment for additional comments. If you have questions or wish to discuss these comments further, please don't hesitate to call me at (415) 865-7630.

Sincerely,


Chuck Flippe

Federal Enforcement Section

20:8V 5-MAR 06

Enclosure

cc: Louise Lew, WESDIY
Mark Malinowsky, DHS
Don Dahlke, RWQCB

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REVIEW OF GROUND-WATER SAMPLING REPORTS
FOR
HUNTERS POINT ANNEX: SITES IR-10 AND IR-11

General and specific comments presented below apply to both documents.

GENERAL COMMENTS

- G.1 A brief summary of the background, history, and suspected areas of contamination would be helpful prior to discussion of ground-water sampling results.
- G.2 Information on the direction of ground-water flow at the site, if known, should also be presented along with water level measurements obtained from this sampling round. The magnitude and direction of the ground-water gradient at the site should be recalculated using the specific water levels for verification.
- G.3 An upgradient off-site well might be included in the network of monitoring wells to determine background levels of contamination.
- G.4 A review of whether sample holding items were met or were exceeded by the laboratory should also be included in the QA/QC Results and Assessment, Section 4.
- G.5 Both a trip blank and an external spike were specified in the QAPP, but were not submitted for analysis. The trip blank is particularly important when volatile organic compounds are being transported.

SPECIFIC COMMENTS

Section 2.0, Page 3 of Both Reports

Clarify whether the teflon bailer used to obtain the ground-water samples was a double check valve bailer since samples were to be analyzed for volatile organic compounds.

Provide information on which parameters the purge water stored in the Baker tanks will be analyzed and how it will be analyzed.

SPECIFIC COMMENTS (cont'd)

Section 4.2, Page 6 of Both Reports

Provisions need to be made to collect double or triple volume for QA/QC samples, as matrix spikes for semivolatile organic compound analysis were not performed because of insufficient sample volume.

More thorough decontamination of equipment is needed to insure that compounds are not detected in the equipment blank.

Section 5.2, Page 10 of Both Reports

The laboratory should also tentatively identify the ten largest peaks of unknown compounds found in the laboratory preparation blanks and in the ground-water samples.

Section 6.0, Page 13 of IR-10 Report, Page 12 of IR-11 Report

Total dissolved concentrations (cation and anion constituents) should be compared with water quality parameters from actual field samples collected from background wells to determine whether these concentrations are due to the "native brackish character of ground water" or contamination.