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HUNTERS POINT
SSIC NO. 5090.3

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

October 29, 1990

Commanding Officer
Naval Station Treasure Island
ATTN: Eddie Sarmiento
Building I (Code 70)
San Francisco, CA 94130

Dear Mr. Sarmiento:

Enclosed are EPA's comments on the draft **Workplan Volume 2F, Sampling Plan - Group V Sites** at Hunters Point Annex. If you have any questions, please call me at (415) 744-2388.

Sincerely,

Chuck Flippo
Remedial Project Manager

cc: Louise Lew, WESTDIV
Mark Malinowski, DHS
Tom Gandesbery, SFRWQCB
Scott Lutz, BAAQMD
David Wells, SFPHD

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EPA COMMENTS ON
DRAFT SAMPLING PLAN - GROUP V SITES
HUNTERS POINT ANNEX

GENERAL COMMENTS

Generally, we find that the Sampling Plan, in conjunction with the QAPP, includes the basic elements suggested by CERCLA guidance documents. One element of sampling not addressed is Sample Designation. Neither the Sampling Plan, nor the QAPP, provides a concise description of how individual samples are to be labelled.

Problems encountered in preliminary field data reports for IRs 10 and 11 suggest some items that should be addressed before the field work outlined here is undertaken. Specifically:

A list of the type and number of sample containers, sample volumes, and QA/QC requirements needed at each sampling location should be included in the plan to aid field personnel when collecting samples. Failure to include this information can and did cause problems ensuring there is sufficient sample for the QA/QC requirements such as matrix spikes and matrix spike duplicates.

The decontamination procedures should be included in the Sampling Plan and should be revised to include a detergent wash on all sample collection containers. The QAPP proposed two different decontamination procedures for bailers, but the less effective procedure was actually used in previous Hunters Point RI sampling efforts. This caused problems of blank contamination and probably cross contamination in other samples. Consequently, we recommend that the decontamination procedure that utilizes a detergent wash be specified.

SPECIFIC COMMENTS

1. **Page 4, Section 1.2, third paragraph.** The last sentence on this page, carrying over to page 5, either repeats the phrase "monitoring wells" or some text is missing.

2. **Page 12, Section 2.2.** Given that groundwater gradient is at this point only assumed, a provision should be incorporated into the plan for installation of appropriately placed wells if water level data collected from the planned wells indicates that these wells are not properly placed to monitor background water quality and potential impact of the site on ground water quality. In Appendix A (Agency Comment Letters and Navy Responses), an additional sentence is included in the Navy's response to this issue: "The need for additional wells will be evaluated on the basis of data collected in the proposed investigations." It would be appropriate to include this sentence in the body of the Work Plan.

3. **Page 15, Section 2.3.1.2.1.** A statement is made in the last sentence of the second paragraph concerning the possible natural origin of nickel detected in samples from this site. This statement should be left out of the Sampling Plan. While nickel, and chromium as well, may truly be attributed to serpentinite-derived materials, it may just as readily be associated with the same activities which resulted in the presence of lead, copper, and zinc in soil at this site.

In the following paragraph, reference is made to asbestos analysis of the sample from boring AD4-5. To be consistent with other tabulated data and subsequent tables, the result of this analysis should be included in Table 5.

Also, a reference is made to "manmade asbestos." It is not clear whether this means asbestos-containing manmade materials, in which case total asbestos would be less than 50 to 60 percent, or processed asbestos fibers as distinguished from asbestos fibers weathered from serpentinite occurring naturally in the vicinity of HPA. In either case, asbestos is a naturally occurring material; the asbestos fibers are not manmade.

4. **Page 18, Section 2.3.1.2.3.** The second sentence on this page states that "[t]race levels of asbestos" have been identified. This does not agree with information on page 15 which states that the composite sample from boring AD4-5 contained 50 to 60 percent asbestos. Please clarify.

5. **Page 20, Section 2.3.1.3.2.** The numbering system used for soil boring and well locations is potentially confusing. A consecutive set of numbers is used with numbers 1 through 10 being borings and numbers 11 through 16 being wells. If the installed wells will be given the same numbers, a person unfamiliar with the investigation might conclude that there are or were an additional 10 wells at this site numbered 1 through 10.

Soil borings are to be drilled to ground water at this site. This is a deviation from the procedures for depth of borings described in Section 2.4 (referred to on page 21). If this is in fact the case, this Section should include a specific statement noting that this is a deviation from general procedures for boring depth. The Statement should include a rationale for the deviation.

6. **Page 21, Section 2.3.1.3.2.** The statement is made that monitoring well S4-1 will be destroyed. This statement needs to be expanded, or supplemented in Section 2.4, by a description of the well abandonment procedures or reference to a document describing proper procedures. The QAPP does not appear to address well abandonment, although steps for grouting test borings are included in the QAPP (Section 6.3). As with well installation, well abandonment may require permits and notification of local agencies.

7. Page 11, Section 2.3.1.4. The middle paragraph on this page references a "burning disposal site ... within Site IR-12." The description of Site IR-12 on page 13 (Section 2.3.1.1) does not describe a burning disposal site. The description of Site IR-15 on page 33 (Section 2.3.4.1) mentions a tank used as an incinerator. Is the background description of **IR-12** incomplete, or is this an erroneous reference to **IR-15**? Or does this actually refer to the former solid waste burn area which is included in **IR-2** (part of the Group I or OU 1 sites)?

8. Page 25, Section 2.3.2.3.1. Plate 4 shows the locations of the planned borings and wells for this site; however, the explanation for this plate has had the symbols for Proposed Boring Location and Proposed Monitoring Well location transposed.

See also Comment #5 regarding the numbering system.

9. Page 27, Section 2.3.3.1. The next-to-last sentence in the background description of IR-14 mentions reports that "drums, transformers, and chemical canisters were disposed on-site." Was there only evidence of surface disposal, or is there also the possibility that containerized waste materials were buried in this area? It may be worthwhile to conduct some geophysical investigations to determine whether any such materials are present in the subsurface.

10. Pages 28 and 30. See Comment #3 concerning "manmade asbestos." If a distinction is being made between naturally occurring asbestos and processed asbestos, or asbestos-containing manmade materials, the basis for the distinction should be stated.

11. Pages 32 and 38. See Comment #6 concerning abandonment of wells.

12. Page 38, Section 2.3.4.3.1. Monitoring Well 6 may need to be moved closer to the southern corner of Site IR-15 (closer to IR-11) to be "downgradient" of the suspected area of contamination. (I.e., if ground water in fact flows radially, the location shown for Well 6 may be more directly downgradient of IR-14 than the contaminated area of IR-15.)

13. Table 11. The analytical method listed for asbestos in the QAPP is "EPA 4-82-020" (which we presume refers to EPA document number 600/4-82-020, "Interim Method for the Determination of Asbestos in Bulk Insulation Samples)." Table 11 cites only "Method 600." We are not aware of such an EPA method. If your intent was to use a different method from that cited in the QAPP, please provide a rationale for the change along with a citation for Method 600. If you meant to refer to the same method, please use consistent terminology.