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From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: DRAFT FINAL TIDAL INFLUENCE MONITORING PLAN (TIMP)
NAVAL STATION TREASURE ISLAND, HUNTERS POINT ANNEX

Encl: (1) Navy Response to DHS and EPA Comments dated 21 March 1991 on the Draft Final TIMP

1. Enclosed please find an addendum to the Draft Final TIMP. This addendum addresses, point by point, the comments received from Environmental Protection Agency (EPA) and Department of Health Services (DHS) on the subject plan. In lieu of resubmitting a revised document, please incorporate the new pages into the Draft Final, as follows, to finalize the TIMP:

a. Remove pages ii, 1, 10, 12, and 19 from the Draft Final TIMP and replace with the new corresponding pages

b. Remove the Results of the Well Survey and Table 1 from the Draft Final Appendix B and replace with the corresponding revised pages.

c. Attach Appendix C to the end of the Draft Final TIMP

2. The Navy plans to initiate the first phase of tidal influence monitoring within the next few months. Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Raymond K. Chiang, Code 1811RC, (415) 244-2554.)

3. By copy of this letter, this document is also being provided to other concerned regulatory agencies.

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DRAFT FINAL
TIDAL INFLUENCE MONITORING PLAN

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1.0 INTRODUCTION

PRC Environmental Management, Inc., (PRC) received Contract Task Order (CTO) No. 0100 from the Department of Navy, Western Division (WESTDIV), Naval Facilities Engineering Command, under the Comprehensive Long-Term Environmental Action Navy (CLEAN) Contract No. N62474-88-D-5086. The CTO calls for developing a tidal influence monitoring plan under the Installation Restoration (IR) program being implemented at the Naval Station, Treasure Island, Hunters Point Annex (HPA) in San Francisco, California (see Figure 1).

Tidal influence monitoring is performed where ground-water levels may be influenced by tidal fluctuations. Tidal influence data are needed to support the ongoing Remedial Investigation/Feasibility Study (RI/FS) in terms of identifying the impact of tidal fluctuations on specific IR sites. Contaminant migration, tidal mixing, and ground-water flows can be significantly affected by tidal fluctuations at HPA. Typically, tidal fluctuations in San Francisco Bay at the Golden Gate vary from -1.4 feet mean sea level (MSL) to + 7 feet MSL (see Table 1). Fluctuations of several feet may be occurring in the ground-water table at IR sites near the shoreline.

Monitoring for tidal influence generally includes measuring changes in ground-water levels in wells and chemical analysis of water content during one or more tidal cycles. Such measurements may indicate changes in ground-water levels and gradients that will be useful to characterize contaminant transport in ground water due to tidal influences. Chemical analysis of ground water may also help indicate the degree of tidal mixing of fresh water and sea water, thus showing the extent of tidal influence on the ground water.

This tidal influence monitoring plan (TIMP) sets forth an approach for monitoring and evaluating tidal influence in the subsurface saturated zone at HPA. The plan primarily addresses just one of five groups of IR sites: Operable Unit II (OU-II). Background information on the IR sites and OU grouping is provided in Section 2.0. The other four groups, OU-I, OU-III, OU-IV, and OU-V are only discussed conceptually. Finally, an HPA site-wide approach is discussed.

In preparing this plan, PRC reviewed various documents, including: tidal influence studies for Group II sites (HLA, 1990c); plan for pilot tidal influence study (HLA, 1990e); various HPA RI/FS Sampling Plans (HLA, 1988, 1990a); and preliminary water level data for the OU-II sites (HLA, 1990b). Several published articles on tidal influence studies were also reviewed. Information from these existing documents was incorporated into this TIMP.

4.2.1 Ground-Water Levels

Selected monitoring wells and two tidal gauge stations will be monitored for water levels continuously over 72-hour periods during peak tidal cycles for four consecutive quarters. The data will be collected at a maximum 15-minute interval with mechanical float recorders or pressure transducers with data loggers. If pressure transducers are used, the units will be vented or normalized to compensate for barometric pressure fluctuations.

Initially, two tidal gauges or staff gauges, will be placed in opposing north and south shoreline locations at the HPA and monitored to provide actual tidal flows and local attenuation at HPA. These stations may be relocated several times if needed. The staff gauges will be constructed and positioned to minimize wave influence.

4.2.2 Field Measurements

Ground-water samples will be collected and measured in the field for temperature, pH, and conductivity. Barometric pressure will be measured on a continuous recorder throughout the TIMP field activities.

4.2.3 Laboratory Analyses of Ground-Water Samples

Ground water will be analyzed in the laboratory for TDS and salinity, once every quarter in conjunction with the 72-hour field monitoring activities. The Bay water immediately adjacent to Hunters Point will also be sampled for pH, conductivity, TDS, and salinity in conjunction with field monitoring activities.

4.3 IR SITE-SPECIFIC EVALUATION

Monitoring parameters will be standardized for all IR sites. Each IR site will have at least two monitoring wells included in the TIMP. Larger sites such as the landfills will have at least three monitoring wells included in the TIMP. If significant contamination and tidal effects are confirmed for a given IR site, additional monitoring wells may be added for the TIMP. (The proposed definition of significant tidal effect is ground-water level change exceeding one-tenth of a foot during a 72-hour period in a given well). Not all TIMP wells need to be monitored over the same 72-hour period in order to provide effective coverage with a limited number of data recording systems. If no significant tidal influence is observed over two consecutive quarters,

See Table 2 for listing of available water table measurements. PRC's commentary and recommendations for OU-II sites are presented below.

5.1.1 IR-6 (Tank Farm) TIMP

Water level data provided by HLA on September 24, 1990, indicate what is most likely a steady, seasonal decline in water levels from June to July 1990, for all IR-6 wells, except IR06MW42. All other wells showed a consistent drop in water levels with a cumulative decline on the order of 1 foot. Plate 1A presents the well locations recommended for tidal influence monitoring and the IR-6 site boundaries.

Well IR06MW42 water levels fluctuated once, rising 0.69 feet, thereby suggesting a possible tidal effect. However, this anomalous reading may be due to a measurement error. Adjacent well IR06MW34 had nearly identical levels on three previous readings, and on the fourth reading, the difference between water levels in the two wells, IR06MW42 and IR06MW34, was exactly 1 ft, suggesting a reading error. PRC recommends that well IR06MW42 and either IR06MW40 or IR06MW41 be included in the full TIMP.

Floating product has been observed in wells at IR-6. Water level measurements at the IR-6 site should be evaluated while taking into account possible interference from floating product.

5.1.2 IR-8 [Building 503, Polychlorinated Biphenyls (PCB) Spill Site] TIMP

A tidal study is recommended at IR-8 because variations in water levels and hydraulic gradients are evident, based on several rounds of water level measurements collected by HLA. The tidal study would evaluate the significance of changes in the magnitude and direction of ground-water flow due to tidal variations.

Three monitoring wells, for which HLA has recorded multiple measurements over several months, show steady, consistent increases in ground-water levels on the order of 1/3 foot each, cumulative during May through July 1990. One possible explanation for the increasing water levels may be a nearby water leak. But tidal influence at the IR-8 site cannot be dismissed. In fact, the limited water level measurements available indicate changing ground-water gradients across the area.

PRC recommends that monitoring wells IR08MW37, IR08MW40, and IR08MW41 from IR-8 be included in the full TIMP.

- Minimum of one monitoring well per IR site
- Two or more monitoring wells per IR site if significant tidal influence is indicated
- Placement of adequate number of wells for ground-water gradient determinations in a critical area where significant tidal influence is indicated
- Available conductivity and TDS measurements
- Well location and subsurface lithology

6.1 OU-I TIDAL INFLUENCE MONITORING PLAN

For IR-2 (Bayfill Area), wells B-1, B-2, B-3, and C5-W have been selected for tidal influence evaluation. It is expected that at least three additional wells will be recommended by PRC at IR-2 for the TIMP. The additional wells will be distributed to provide effective coverage of IR-2, as conceptually shown in Plate 1A. Tidal influence is expected to be significant for the entire IR-2 site, with measured conductivities in collected ground-water samples on the order of several 10,000 micromhos per centimeter. See Table 1 in Appendix B for available water conductivity data.

The same technical approach and rationale, monitoring parameters, site-specific evaluation, and criteria proposed for OU-II sites will be applied to IR-2, as well as to the other OU-I sites, IR-1 (Industrial Landfill) and IR-3 (Oil Reclamation Ponds). Water level measurements at the IR-3 site should be evaluated, while taking into account possible interference from floating product. The minimum number of monitoring wells selected for the TIMP will be three per OU-I sites due to the sites' proximities to the Bay shoreline.

6.2 OU-III TIDAL INFLUENCE MONITORING PLAN

The OU-III sites, IR-4 (Scrap Yard) and IR-5 (Old Transformer Storage Yard), may be subject to minor tidal influence based on their relative inland locations. No data are available to assess hydrogeological conditions in these OU-III sites.

The same technical approach and rationale, monitoring parameters, site-specific evaluation, and criteria will also be applied to the OU-III sites. It is expected that two wells per IR site will suffice for the TIMP.

**RESULTS OF WELL SURVEY
NAVAL STATION, TREASURE ISLAND
HUNTERS POINT ANNEX
SAN FRANCISCO, CALIFORNIA**

This report presents the results of a survey of wells installed at Hunters Point Annex (HPA) prior to 1988. The well survey was requested by the Navy to evaluate the condition of onsite wells and, on the basis of the results of the survey, design a pilot tidal influence study. The plan for the pilot tidal influence study is presented under separate cover.

The survey of existing wells was completed on August 23 and 24, 1990. The objectives of the survey were to (1) inspect the condition of existing wells and determine their suitability for groundwater sampling and water-level monitoring; (2) obtain water levels and specific conductance measurements of groundwater within the wells; and (3) select wells that could be used for the aforementioned pilot tidal influence study. Following the completion of the well survey, results were reviewed and recommendations regarding well maintenance and abandonment were developed. The remainder of this document describes the methods, results, and recommendations of the well survey.

Methodology

A summary of existing wells was presented in HLA's *Reconnaissance Activities Report, Remedial Investigation/Feasibility Studies, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California, Volume I*. Twenty-eight wells were identified. These wells are listed in Table 1 with the results of the survey. The water-level, total depth, and specific conductance measurements, as well as any comments on well condition are noted. The measured total depths of the wells were compared to the total depths reported on the well construction summaries to evaluate whether the wells had collapsed or deteriorated from silt accumulations in the well. Those wells where the

measured total depth was not in agreement with the reported depth are identified herein. Water-level fluctuations and specific conductance measurements will be used to evaluate potential tidal influences.

Results of Well Inspections

A brief description of the results of the well survey for each IR site is presented below.

Site IR-1 Wells I-1 and I-4 located at Site IR-1, the Industrial Landfill, are damaged. It appears that both wells have been hit by heavy equipment and are bent at the surface. Well I-8 is located near the shoreline, and on the basis of observation of the well at high tide, it appears that the well may flood at extreme tides. The remaining wells at Site IR-1 (I-2, I-3, I-5, I-6, I-7, I-9) appear to be in good condition.

Site IR-2 Well B-4 at Site IR-2, the Bayfill Area could not be located. The locking cover at Well B-5 is badly rusted and the water is red brown and cloudy. The remaining wells at Site IR-2 (B-1, B-2, B-3, C5-W) appear to be in good condition.

Site IR-3 All three wells at Site IR-3, the Oil Reclamation Ponds, contain floating product. Well O-1 contains 1.34 feet of floating product, Well O-2 contains 6.33 feet of floating product and Well O-3 contains 5.11 feet of floating product. Total depths and specific conductances in these wells were not measured because of the floating product. All three wells appear to be in good condition.

Site IR - 7 The locking cover at Well S-4, located at Site IR-7, the Subbase Area, has been damaged and needs to be replaced. The water within the well is reddish brown and cloudy and appears to be rusty. The total depth of Well P-2 was measured at 16 feet, but the well completion summary indicated that the total depth of the well should be 19 feet. This well is considered to be in useable condition, but the total depth should be checked again after redevelopment of the well. Fibrous (root) material was encountered while bailing Well S-4. this well should also be checked again after redevelopment. All other wells at site IR-7 (P-1, S-1, S-3) appear to be in good condition.

Site IR-8 Two wells previously installed at Site IR-8, the PCB Spill Site, (W-4, and W-7) could not be located. they may have been buried during the construction of Building 606 in 1988 and 1989. Well W-6 was recently located by the Navy. The well appears to be in good condition, but does need a new christy box.

Other Areas Well B5A-W is not included in any of the IR sites but was included in the well survey. The well, located near the intersection of J and Manseau streets, appears to be in good condition.

Results of Water-Level and specific Conductance Measurements

Specific conductance measurements may indicate mixing of fresh water and saline water and therefore indicate tidal influence. Specific conductance measurements of groundwater varied from 3,500 $\mu\text{mhos/cm}$ at Well B5A-W, the most inland well, to 42,000 $\mu\text{mhos/cm}$ at Well I-8, the well closest to San Francisco Bay. In general, the

highest specific conductance measurements were obtained from wells located closest to bay. This appears to be related to the mixing of saline bay water with groundwater in response to tidal influences on groundwater.

Water-level elevations were calculated for each well with a reported top of casing elevation. Top of casing elevations referenced to Navy datum were reported on well completion diagrams presented in Emcon Associates' *Confirmation Study, Verification Step, Hunters Point Naval Ship Yard and (Disestablished), San Francisco, California, 1987*, and ERM West's report entitled *Hunters Point Soil & Water Sampling Near Proposed Galley, 1987*. These elevations were corrected to Mean Low Water elevations for calculation of water-level elevations and are presented on Plate 1. Water levels range between 1.43 and 5.25 feet above Mean Low Water. A water-level depression is evident near Wells I-2, I-3, and I-5 at Site IR-1. The cause of this depression is uncertain at this time but will be investigated further during the Remedial Investigation (RI) at the site.

Recommendations

All wells, with the exception of wells having floating product, contained suspended sediments in discharge water and therefore should be redeveloped before groundwater sampling. It is also recommended that all wells be resurveyed during the RIs to confirm top of casing elevations. On the basis of this well survey, it is recommended that Wells I-1, I-4, and I-8 be abandoned because they are damaged or may be inundated by bay water during extreme high tides.

Table 1 RESULTS OF WELL SURVEY, HUNTERS POINT ANNEX

| WELL # | WATER LEVEL BTOC (feet) | WATER LEVEL ELEVATION (feet)* | SCREEN INTERVAL BTOC (feet) | CONSTRUCTED TOTAL DEPTH BTOC (feet) | MEASURED TOTAL DEPTH BTOC (feet) | SPECIFIC CONDUCTANCE (umhos/cm) | STATUS | COMMENTS | RECOMMENDATIONS |
|--------|----------------------------|-------------------------------------|-----------------------------------|---|--|---------------------------------------|----------|--|---|
| I-1 | NA | NA | 5-20 | 21 | NA | NA | unusable | Well is kinked at ground surface | Abandon well |
| I-2 | 12.73 | 2.91 | 6.5-21.5 | 22 | 21 | 4700 | usable | Sediment on bottom, water is clear | Redevelop well |
| I-3 | 10.94 | 1.43 | 5-18 | 19 | 20.5 | 4800 | usable | Sediment on bottom, feels firm, water is cloudy | Redevelop well |
| I-4 | NA | NA | 5.5-15.5 | 16.5 | NA | NA | unusable | Well is bent at 90 degree angle at surface | Abandon well |
| I-5 | 11.70 | 2.61 | 4.5-19.5 | 20.5 | 21 | 4200 | usable | Below grade well, soft bottom water is cloudy and gray | Redevelop well |
| I-6 | 6.65 | 5.40 | 4.5-12.5 | 13 | 12.5 | 5500 | usable | Sediment on bottom, water is cloudy, brown | Redevelop well |
| I-7 | 3.36 | 5.02 | 3.5-13.5 | 14 | 14 | 31000 | usable | Sediment on bottom, feels firm, some plant debris in water | Redevelop well |
| I-8 | 2.56 | 4.64 | 2-12 | 13 | 11.5 | 42000 | unusable | Top cover rusted off, not locked water is silty brown, may flood at extreme tides | Evaluate feasibility of extending surface and well casings |
| I-9 | 5.44 | 5.24 | 3.5-13.5 | 14.5 | 14.5 | 8500 | usable | Bottom is soft, water is slightly cloudy, gray | Redevelop well |
| B-1 | 5.60 | 5.52 | 5-20 | 20.5 | 21 | 17000 | usable | Sediment on bottom | Redevelop well |
| B-2 | 9.15 | 5.06 | 4.5-19.5 | 20.5 | 20.5 | 38000 | usable | Sediment on bottom, silty gray water | Redevelop well |
| B-3 | 10.55 | 4.61 | 5-20 | 20 | 20 | 10000 | usable | Sediment on bottom, firm, bailer catches on casing wall | Redevelop well |
| B-4 | NA | NA | 4-19 | 20 | NA | NA | unusable | Could not locate | None |
| B-5 | 4.67 | 2.27 | 3-17 | 18 | 16.5 | 37000 | usable | Sediment on bottom, water is red brown, cloudy | Redevelop well, install new locking well cover |
| C5-W | 6.80 | NA | 5.5-15.5 | 15.5 | 15 | 11000 | usable | Sediment on bottom, firm | None |

Table 1 RESULTS OF WELL SURVEY, HUNTERS POINT ANNEX

| WELL # | WATER LEVEL BTOC (feet) | WATER LEVEL ELEVATION (feet)* | SCREEN INTERVAL BTOC (feet) | CONSTRUCTED TOTAL DEPTH BTOC (feet) | MEASURED TOTAL DEPTH BTOC (feet) | SPECIFIC CONDUCTANCE (umhos/cm) | STATUS | COMMENTS | RECOMMENDATIONS |
|--------|----------------------------|-------------------------------------|-----------------------------------|---|--|---------------------------------------|----------|---|--|
| O-1 | 9.60 | NA | 3.5-18.5 | 19.5 | NA | NA | usable | Product at 8.27 ft btoc. | None |
| O-2 | 14.75 | NA | 4-20.5 | 21.5 | NA | NA | usable | Product at 8.42 feet btoc | None |
| O-3 | 12.79 | NA | 5-20 | 21 | NA | NA | usable | Product at 7.68 feet btoc | None |
| P-1 | 7.71 | 4.56 | 4-19 | 19 | 19.5 | 30000 | usable | Well needs new cap, soft on bottom | Redevelop well, replace cap |
| P-2 | 7.88 | 4.32 | 4-19 | 19 | 16 | 37000 | usable | Below grade well, soft on bottom | Redevelop well |
| S-1 | 7.42 | 5.25 | 5-18 | 18 | 18 | 5000 | usable | Below grade well, soft on bottom | Redevelop well |
| S-2 | 7.33 | 4.25 | 3-18 | 20.5 | 21 | 8500 | usable | Below grade well | Redevelop well |
| S-3 | 8.15 | 4.07 | 5-20 | 20 | 20 | 22000 | usable | Below grade well, soft on bottom | Redevelop well |
| S-4 | 11.74 | 3.95 | 6-21 | 21 | 21 | 27000 | usable | Water is red brown, cloudy Sediment on bottom, fibrous (root) material in well no christy box | Redevelop well, replace christy box |
| W-4 | NA | NA | 10-15 | 15 | NA | NA | unusable | Could not locate | None |
| W-6 | 5.54 | NA | 10.5-20.5 | 20.5 | NA | 3880 | usable | Below grade well, no christy box | Redevelop well, replace christy box |
| W-7 | NA | NA | 8-13 | 13 | NA | NA | unusable | Could not locate | None |
| B5A-W | 6.98 | NA | 3-13 | 15 | 14 | 3500 | usable | Sediment on bottom, firm, needs lock | Redevelop well, replace lock |

BTOC = Below top of casing
 * = above mean low water
 NA = not available

APPENDIX C

NAVY RESPONSE TO COMMENTS ON FINAL DRAFT TIMP

**NAVY RESPONSE TO DHS COMMENTS ON THE DRAFT FINAL TIDAL INFLUENCE
MONITORING PLAN - HUNTERS POINT ANNEX**

The following presents the Navy's response to DHS comments regarding the Draft Final Tidal Influence Monitoring Plan:

Reference: Letter from Mark Malinowski, DHS to Eddie Sarmiento, WESTDIV, dated March 21, 1991

Comments

| <u>Pg</u> | <u>Sec</u> | <u>Ppgh</u> | |
|------------------|-------------------|--------------------|--|
| 1 | 1.0 | 4 | Line 3. Edit "...just one of <u>four</u> groups of..." to read '...just one of <u>five</u> groups of..." |
| 10 | 4.3 | 1 | Line 7. Edit "...with a limited number <u>data</u> of recording system." to read "... with a limited number of <u>data</u> recording systems." |
| 12 | 5.1.1 | 2 | Floating product has been observed in wells at IR-6. The TIMP should include the same caveat regarding floating product as identified for site IR-3 (page 19). |

Response:

Edits and caveat incorporated in text.

**DHS COMMENTS ON THE DRAFT FINAL RESULTS OF WELL
SURVEY - HUNTERS POINT ANNEX**

Comment:

Comment section for well I-3 is incomplete. Well I-4 is missing.

The text (pg. 3, Site IR-8) indicates that well W-6 could not be located, yet conductivity measurements, comments and recommendations are presented in Table 1. Correct or explain the discrepancy.

Several wells identified in Table 1 have measured depths greater than the constructed total depth. Given the information in Table 1, it could be assumed that some of the wells were not constructed with end caps, suspended solids will continue to be a problem during well development and sampling for analysis and that the wells should be decommissioned. Provide an explanation for the depth discrepancies in the Methodology section of the Well Survey Report and add a footnote to Table 1 referencing the explanation in the text.

Response:

Table 1 has been revised to include the complete comment section for Well I-3. Well I-4 is presented in Table 1; however, the well name was omitted from the table. Table 1 has been revised to include well name for Well I-4.

Well W-6 was located by the Navy after the original well survey was performed. Table 1 was revised to reflect this change; however, the text included in the TIMP was not revised. Please insert the revised text (attached), which incorporates the information from Well W-6.

The discrepancy noted is related to the reference point for well depth measurements. During well installation, well depths are typically measured from ground surface, whereas, the well depths measured during the well survey were relative to the top of casing. Table 1 has been revised to show all well depths relative to the top of casing. Table 1 has been revised to show all wells (I-3, I-5, P-1, S-2) had depths greater than indicated from well construction details provided by EMCON Associates. Three of these wells were 0.5 feet deeper than constructed and the fourth, Well I-3, was 1.5 feet deeper than constructed. Well construction details indicate that bottom caps were used during well construction. Therefore, it is believed that the discrepancies in well depth are related to measurement error during well construction. In addition, Table 1 indicates that the measured depths of several wells are less than indicated on well construction details by 0.5 to 3.0 feet. These differences in well depths are attributed to sediment accumulations in the wells and/or measurement error during well construction.

**NAVY RESPONSE TO EPA COMMENTS ON THE DRAFT FINAL TIDAL INFLUENCE
MONITORING PLAN - HUNTERS POINT ANNEX**

The following presents the Navy's response to EPA comments regarding the Draft Final Tidal Influence Monitoring Plan:

Reference: Letter from Chuck Flippo, EPA, to Eddie Sarmiento, WESTDIV, dated March 21, 1991

Attachment 1 - EPA Review of HPA "Results of Well Survey"

Comment:

4. It is not clear where the "appropriate response" is included in the TIMP. There appears to be no reference for conductivity of fresh water. Section 4.2.3 Laboratory Analysis of Ground-Water Samples makes no reference to other contaminants which will affect conductivity. Section 6.1 makes reference to "available water quality data" in Table 1, but Table 1 within the TIMP presents tide data and Table 1 included in Appendix B with the Results of Well Survey includes only conductivity data. There does not appear to be any reference to water quality collected by the Remedial Investigation activities.

Response:

The appropriate response is included at the end of Appendix B of the TIMP. Note that the objectives of the TIMP are not to define the ground-water quality trends at HPA but rather to evaluate tidal influences on ground-water elevations which could affect the migration of potentially contaminated ground water. Characterization of ground-water quality will be performed in conjunction with Remedial Investigation (RI) studies. The results of these studies will be presented later in the Summary of Finding Memoranda and RI reports for each Operable Unit.

Attachment 2 - EPA Review of Plan for Pilot Tidal Influence Study

Comment:

1. Available water quality data for wells is not provided in the TIMP.

Response:

Preliminary water quality data, in the form of specific conductance measurements, are provided in Table 1 of Appendix B of the TIMP. Additional ground-water quality data will be presented later in the Summary of Finding Memoranda and RI for each Operable Unit.

Comment:

7. In the process of incorporating OU-V into the TIMP, a necessary change was omitted on Page 1: Paragraph 4, second sentence should state that the TIMP primarily addresses just one of five groups of IR sites.

Response:

Correction made.