



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

November 25, 2003

2003 DEC - 2 P 2: 35

BRAC OFFICE

Mr. Jerry Dunaway  
Southwest Division, Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, CA 92101-8517

RE: EPA Comments on Draft Investigation Area H1 Data Gaps Sampling Plan, Former Mare Island Naval Shipyard, Vallejo, California, dated September 25 2003

Dear Mr. Dunaway:

This letter presents our comments on the Area H1 Data Gaps Sampling and Analysis Plan, dated September 25, 2003. As mentioned in a previous letter in October, EPA is concerned about the possibility of polychlorinated biphenyl (PCB) contamination on Dump Road. Although we discussed this issue with you and a recent meeting, and we now understand that Dump Road appears to be paved, it still is of considerable concern that the paving of Dump Road could have involved the use of PCB contaminated oils. The presence of PCBs at depth along Dump Road suggest to us that dump road may be a source of the PCBs. It does not appear that any characterization of shallow soil samples collected from Dump Road for PCBs has been performed.

Because of the current frequent use of this road, EPA urges the Navy to sample for PCBs in surface samples on Dump Road as soon as possible. We suggest collecting soil samples at 200 foot intervals along Dump Road (21 locations) at depths of 0-6" and 6"-12" at each sample location - soil samples should include depths which display "asphalt-like" characteristics. The worst areas of PCB impact appear to be adjacent to the sludge drying beds in the former sanitary sewage treatment plant, at the location of monitoring well 01W038A (where PCBs have been detected in shallow groundwater samples), adjacent to the DRMO yard and approximately 430 feet west-southwest of the DRMO yard. Please assure that these locations are among those selected for sampling.

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## GENERAL COMMENTS

1. Please determine if the force main located within the proposed slurry wall alignment is still pressurized, and if so abandon it, as part of this sampling effort.
2. The Sampling and Analysis Plan (SAP) does not appear to contain a procedure for abandoning Cone Penetrometer Test (CPT) probes, other than a single sentence on page C-5. Please revise the SAP to provide detailed procedures for use by field personnel for the methods to be used to abandon CPT probe holes.
3. Please sample for PCBs along Dump Road as described above in this letter.

### Northwest Dump Road Subarea

1. Proposed sample location NDR-SB09 is about 50 feet away from previous sample location IR01GB087 where lead was detected at a concentration of 8100 ppm. As this location will likely require some form of action, it would be preferable to delineate the extent of lead contamination 200 feet to the east-southeast of proposed location NDR-SB09. Please either move proposed sample location NDR-SB09 200 feet to the east-southeast or add an additional sample location 200 feet to the east-southeast from the proposed location of NDR-SB09.

### Wetland C

1. A grab groundwater sample collected from sample location IR01GB016 (outside the proposed alignment of the containment wall) was found to contain PCBs at a concentration of 9 parts per billion in 1994. The contamination is probably due to migration from the oil sumps where one grab groundwater sample was found to contain PCBs at a concentration of 2,200 parts per billion. By comparison, the tap water preliminary remediation goal for PCBs is 0.034 parts per billion. Please revise the Sampling and Analysis Plan to incorporate collecting grab groundwater samples from the shallowest aquifer at the proposed location of CPT location SDP-CPT106, Monitoring Well 01W07A and a location in Dredge Pond 4N south of the proposed location of SDP-CPT106. Figure 11-1 indicates that there is an existing monitoring well at the location of DSP-CPT106 (DPW76), though no data from this well is present in the TetraTech database (our version could be out of date). If DPW76 is a shallow groundwater monitoring well, the shallow groundwater sample should be collected from it rather than from the CPT probe hole. Please analyze these samples for petroleum hydrocarbons and PCBs.

Thank you for the opportunity to review and comment on the data gaps SAP for H1. We

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would appreciate your immediate attention to the matter of the possible PCB contamination on Dump Road. If you have any questions about this letter, please contact me at (415) 972 3175.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Roth". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Emily Roth  
Remedial Project Manager

cc: Carolyn d'Almeida, EPA  
Gary Riley, RWQCB  
Chip Gribble, DTSC  
Henry Chui, DTSC  
Dwight Gemar, Weston  
Jeff Raines, Techlaw