



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

January 10, 1994

Mr. Stephen Chao
Naval Facilities Engineering Command
Western Division
900 Commodore Way, Bldg. 101
San Bruno, CA. 94066

Re: Draft Additional Petroleum Sites Investigation Field Work Plan,
dated December 17, 1993

Dear Mr. Chao,

The U. S. Environmental Protection Agency (EPA) has received and reviewed the subject document and submits the following comments. Call me at 415-744-2383 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Gill".

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

cc: Elizabeth Adams (RWQCB)
C. Joseph Chou (DTSC)
Ken Eichstaedt (URS)
Josh Marvil (PRC) (Fax)

Comments

Draft Additional Petroleum Sites Investigation Field Work Plan, dated December 17, 1993

General Comment

1. The concept of using field sampling as a primary screening and sample collection tool is one that EPA is encouraging sites to use, as this speeds up the turnaround time and helps to reduce costs with little added risk. But for closure situations where little or no data is available, as is the case for certain tanks and sumps at these sites, EPA agrees with the State in their Tri-Regional Guidelines. These guidelines state that data must be analyzed by a State certified lab in order to approve the sites for closure. These labs will ensure that QA/QC methods are followed and produce high data quality. The Navy should review the soil sampling summary's Certified Lab column in Table 1 and update it based on requirements of these guidelines.

Specific Comments

1. Figure 8, page 15. The "Final IRP Petroleum Sites (And Wastewater Tanks and Sumps) Characterization Report" of October 1, 1993 (page 74) says that an area of TPH contamination may exist is in the area southwest of former Tank 43. Yet, Figure 8 shows proposed soil sample locations to be collected north/northeast/west of the Tank 43 area. Please explain this discrepancy.
2. Section 4.2.1, page 23, para 1. The groundwater sampling locations for Site 5 cover only the area around the Tank 12 spill area. Once again, a discrepancy exists between this document and the Characterization Report. The Characterization Report states (page 70) that in addition to around Tanks 12 and 13, the groundwater around Tank 26 and near Tanks 4 and 5 may have been affected by petroleum releases. Yet these additional areas are not to be sampled at all. Please explain.
3. Section 4.2.1, page 23, para 2. The text says that if "samples indicate significant groundwater contamination, then downgradient wells will also be installed within 10 feet of the source sumps". Please clarify what significant means.

Editorial comments

1. Section 4.3.2, page 23-25. This brief summary of well installation and development procedures is a helpful description and is appreciated.
2. It is also appreciated that Plate 1 was put on regular copy paper, as blueprint paper tends to fade over time. Please continue this practice.