



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

March 18, 1998

Mr. Stephen Chao  
Naval Facilities Engineering Command  
Engineering Field Activity, West  
900 Commodore Way, Bldg. 210  
San Bruno, CA. 94066-2402

Re: *Draft Final Site 1 Landfill Closure Plan and Postclosure Maintenance Plan,*  
dated February 5, 1998

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and various responses to comments. A few questions remain and are attached. If you have any questions, please call me at 415-744-2385.

Sincerely,

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

Michael D. Gill  
Remedial Project Manager  
Federal Facilities Cleanup Branch

cc: J. Chou (RWQCB)  
K. Eichstaedt (email)  
T. Mower (PRC) (email)  
S. Olliges (NASA) (email)  
P. Strauss (MHB) (email)

## COMMENTS

*Draft Final Site 1 Landfill Closure Plan and Postclosure Maintenance Plan*,  
dated February 5, 1998

1. We suggest that a brief description be added to the introduction describing the document name changes and what this document now comprises. The only related document that is missing from this compiled plan appears to be the Final Construction Specification. This is OK, but should be mentioned in the same summary.
2. The responses to comments on the Preliminary Design documents (design and specifications) (February 5, 1998 letter) have been responded to and incorporated satisfactorily.
3. Unfortunately, none of the responses to comments on the *Draft Site 1 Postclosure Monitoring Plan* (February 20, 1998 letter) are presently reflected in Appendix E. Appendix E is still the draft version from August 1, 1997. Please update the appendix. In addition, a few questions remain regarding these responses to comments.
  - a) Comment 3. Please provide details substantiating the rationale for selecting metals surrogates as monitoring parameters instead of directly sampling for metals at Site 1. Given the uncertainty in using surrogates and the availability of proven methods for analyzing metals, it is unclear why the Navy would choose to use surrogates in this case.

If all metals show high correlation sufficient to accurately predict that metal concentrations are associated with colloidal carbon-type materials, then it may be possible to justify using surrogates. But this would need to be proven for the metals present at this particular site. It should be noted that the groundwater may already have variable surrogate concentrations which would prevent proper correlation to metals concentrations. The Navy should prove for Site 1 that these correlations will be able to accurately predict that metals are migrating. The Navy should also cite regulations that allow for the use of surrogates. In addition, why were the three surrogates (pH, total organic carbon, and total nitrogen) chosen?
  - b) Comment 4. Please add language to the text that states that any intrawell comparison decisions will be done with regulatory concurrence.
4. Section 6.3, page 25. This section needs work. Our version says: "This section to be completed by the Navy after a subcontractor has been designated".
5. Chapter 6. There are incomplete pages in this chapter, possibly because of a printing error (pages 30, 31 and pages 37, 38). There does not appear to be information missing, only unnecessary extra space.