



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

N30519\_000148  
NFD POINT MOLATE  
SSIC NO. 5090.3.A

VIA FACSIMILE  
(415) 244-2774

March 24, 1997

Mr. Larry Douchand, BRAC Environmental Coordinator  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, CA 94066-2402

Re: (1) Navy's Response to Agency Comments on Draft Time-Critical Removal Action Memorandum, IR Site 04, Naval Fuel Depot Point Molate and (2) Navy's Internal Review of Time-Critical Removal Action

Dear Mr. Douchand:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Navy's February 13, 1997, "Response to Agency Comments on Draft Time-Critical Removal Action Memorandum, Shoreline Areas (IR Site 04), Naval Fuel Depot Point Molate" and the Navy's January 23, 1997, "Internal Review of Time-Critical Removal Action". Based upon review of the referenced documents, U.S. EPA concurs with the California Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB) that the Navy's responses do not adequately address Agencies' concerns and do not address the scope and schedule of the RWQCB Order - Task 8c which requires containment of contaminated groundwater beyond the existing trench. As a member of the Pt. Molate BRAC Cleanup Team (BCT), U.S. EPA strongly encourages the Navy to reconsider its decision to limit the removal action and work diligently towards addressing the tasks identified in the RWQCB orders, including Task 8c.

As a part of U.S. EPA's review of the above referenced documents, enclosed comments address areas of major concerns and disagreement (please see enclosure). If you have any questions concerning this letter, please do not hesitate to contact me at (415) 744-2365.

Sincerely,  
  
Phillip Ramsey  
Remedial Project Manager

Enclosure

cc: Mary Rose Cassa, California Department of Toxic Substances Control  
James Nusrala, California Regional Water Quality Control Board - San Francisco Bay Region

ENCLOSURE

U.S. EPA Review of (1) Navy's Response to Agency Comments on Draft Time-Critical Removal Action Memorandum, IR Site 04, Naval Fuel Depot Point Molate and (2) Navy's Internal Review of Time-Critical Removal Action

Comments:

1. On page 2 of the Navy's response to Agency (RWQCB) comments text incorrectly states, "[t]he Navy and regulatory agencies agreed during Base Realignment and Closure (BRAC) Cleanup Team (BCT) meetings on August 27 and October 22, 1996, that the primary objective of the Site 4 removal action is to contain floating fuel immediately south of the existing extraction trench." U.S. EPA has never agreed that a focus of the removal action should be limited to floating fuel product only, nor do meeting minutes from the referenced August 27 or October 22, 1996, meetings express any such "agreement". Further, Pt. Molate November 19, 1996, BCT Remedial Project Managers meeting minutes state on page 2 and 3:

The Navy summarized the contents of the Site 4 removal action memorandum. As discussed in previous RPM meetings, the Site 4 removal action will focus on containing floating fuel and contaminated groundwater (emphasis added) in Drum Lot No.1 area (north of the fuel pier). The memorandum recommends a sheet pile wall extending from the southern tip of the Site 3 extraction trench to the piezometer PZ11-75 area. The exact length of the sheet pile wall will be determined in the final action memorandum and subsequent design drawings, and it will be based on funding availability... The Navy stated that the action north of the fuel pier will (1) contain all known floating product north of the fuel pier (not including product already being contained by the Site 3 extraction trench, (2) intercept the majority and highest concentrations of petroleum contamination in groundwater (emphasis added), (3) remove part of the low-level chlorinated volatile organic compound (VOC) plume, and (4) meet fiscal limitations.

2. Expanded Data Evaluation: U.S. EPA's General Comment No. 1 on the referenced removal action memo identifies the need for an expanded data evaluation. This comments is detailed in DTSC's Specific Comment No. 1. The Navy indicates the following in response to DTSC's comment: "[a] detailed evaluation of contaminant trends and presentation of chemical data from numerous sampling events is beyond the scope of the Site 4 action memorandum. Furthermore, presentation of data from these

previous sampling events will not change the overall interpretation of the site contamination or the proposed removal action." U.S. EPA asserts that it is reasonable for the Navy to include in its evaluation a review and assessment of the 6 or 7 sampling events completed at the shoreline/treatment pond areas. Further, review of past analytical data (both soil and groundwater) indicates that a threshold concentration of at least one contaminant of concern has been exceeded in the Drum Lot No. 1 portion of the Shoreline Area (IR Site 03). In the Navy's September 1994 report, "Shoreline Investigation Soil and Sediment Data Summary, data indicates a maximum detection of total xylenes at 3,500 ug/kg or parts per billion (ppb) in a water-saturated soil sample collected approximately 14.5 feet below ground surface at boring number SB11-57. This value exceeds the 2,680 ppb total xylenes "lowest effects concentration or estimated value" included in Table 1 (Summary of Groundwater Analyses at NFD Point Molate Drum Lot No. 1) of the Navy's Internal Review of Time-Critical Removal Action.

3. The Navy's Internal Review of Time-Critical Removal Action indicates that "[a] 700 foot extension will unnecessarily contain vast amounts of groundwater where no free floating product was observed." U.S. EPA would like additional clarification on how it calculated the volume of water to be extracted to contain migration or what it considers "vast amounts of groundwater". U.S. EPA estimates that the total pumping rate for extraction wells within Drum Lot No. 1 would be less than the approximate 50 gallons (total) per minute extracted from the Treatment Pond Site.

4. U.S. EPA would again like to emphasize to the Navy the benefit in completing the containment trench at this time, including cost savings and completion of a removal action that could bring closure and containment to a significant source of contamination at Pt. Molate. In a recent discussion with Navy representative Izzat Ahmadiyya, U.S. EPA has learned that the Navy may have spent as much as \$300,000-350,000.00 to date assessing contamination at the Drum Lot area. This total represents approximately one third of the total cost for a complete trench extension. U.S. EPA encourages the Navy to reconsider its decision to limit the removal action to containment of floating product (via minimum trench extension), install a complete containment trench extension, and comply with RWQCB Orders.