

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737



May 5, 1994

Commanding Officer
Western Division
Attn: Mr. Ernesto Galang, Code 1813
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-0720

Dear Mr. Galang:

PHASE IIA REMEDIAL INVESTIGATION FIELD WORK PLAN ADDENDUM, NAVAL STATION TREASURE ISLAND

The California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) has reviewed the draft Phase IIA Remedial Investigation Field Work Plan Addendum. This letter transmits comments from the DTSC and RWQCB. Comments of the RWQCB are attached to this letter.

The following summarizes critical points of the DTSC and RWQCB comments.

CRITICAL POINTS PROVIDED BY THE DTSC

1. One year of quarterly groundwater sampling is planned in the Phase IIA Remedial Investigation Field Work Plan Addendum. Before the complete implementation of this work plan, a long term groundwater sampling plan needs to be developed.
2. At the end of the first quarter of groundwater sampling the Navy will develop a list of wells to be sample for three additional quarters. This must be submitted to the DTSC and RWQCB for approval.

CRITICAL POINTS PROVIDED BY RWQCB

3. It is common practice to stabilize field parameters before taking a groundwater sample; therefore, all groundwater samples should be measured in the field for pH, conductivity, turbidity, and temperature.
4. Groundwater samples should only be taken from those wells with an appropriate soil boring/well construction log to insure that a representative groundwater sample is obtained.

#286



Mr. Ernesto Galang
May 5, 1994
Page Two

5. The significance of the well should be evaluated. If a monitoring well must be abandoned due to its condition, another well may have to be installed next to the abandoned one.

SPECIFIC COMMENTS OF THE DTSC

1. Section 4.2, Groundwater Sample Collection, page 10, third paragraph

The meaning of the first sentence of the paragraph is unclear. If contamination is detected in a monitoring well, then three additional sampling events will be necessary. In addition, wells downgradient from a contaminated site must be sampled quarterly in order to monitor the movement and extent of a groundwater plume.

2. Section 4.2, Groundwater Sample Collection, page 10, third paragraph

The DTSC agrees that sites undergoing FS evaluation for groundwater contamination should be sampled for three additional quarters. The Navy must also recognize that after the year of groundwater monitoring is completed, many sites will require continual groundwater monitoring until the remediation of the site is completed. Before the complete implementation of this work plan, a long term groundwater sampling plan needs to be developed.

3. Section 4.2, Groundwater Sample Collection, page 10, third paragraph

The list of monitoring wells to be sampled for three additional quarters must be submitted to the DTSC and RWQCB for approval.

4. Section 4.3, Single-Well Aquifer Tests, page 10 and 13

Please identify which wells will undergo rising-head slug tests.

5. Section 4.4, Tidal Influence Study, Figure 3

Please explain why there are no wells from Site 6 included in the Tidal Influence Study. Information on tidal influence at Site 6 is very much needed. Can existing wells be used?

6. Appendix C, Section 4.2.1, page C-8

Please explain how the staff gauge at the shoreline will be constructed and positioned to minimize wave influence.

Mr. Ernesto Galang
May 5, 1994
Page Three

If you have questions regarding these comments, please contact me at (510) 540-3809. If appropriate a conference call may be arranged to discuss our comments. You may contact the RWQCB, but should do so after contacting DTSC to ensure a coordinated approach for all regulatory comments.

Sincerely,



Thomas P. Lanphar, Project Manager
Base Closure Unit
Office of Military Facilities

Enclosure

cc: Ms. Gina Kathuria
San Francisco Bay
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Mr. Jim Sullivan
BRAC Environmental Coordinator
Code 80
Naval Station, Treasure Island
410 Palm Avenue
San Francisco, California 94130-0410

Ms. Rachel D. Simons
Remedial Project Manager
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105-3901

Admin Records (3 copies)

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612
(510) 286-1255

April 25, 1994
File No. 2169.6013 (GK)



Mr. Tom Lanphar
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2737

**SUBJECT: COMMENTS ON NAVAL STATION TREASURE ISLAND DRAFT PHASE IIA
REMEDIAL INVESTIGATION FIELD WORK PLAN ADDENDUM, DATED
3/2/94**

Dear Mr. Lanphar,

Below are the comments from the San Francisco Bay RWQCB staff's review of the above referenced document.

GENERAL COMMENTS:

1. It is common practice to stabilize field parameters before taking a groundwater sample; therefore, all groundwater samples should be measured in the field for pH, conductivity, turbidity, and temperature.
2. Groundwater samples should only be taken from those wells with an appropriate soil boring/well construction log to insure that a representative groundwater sample is obtained.

All wells should have had soil boring/well construction logs created during their construction. If such logs cannot be located for a particular well, that monitoring well should be properly abandoned (using California Well Standards, 1991 as guidance). By analyzing the soil boring/well construction logs, monitoring wells that were installed (or constructed) in a manner which will not produce representative samples will be identified. The Navy should analyze characteristics of the well that will affect obtaining a representative groundwater sample such as, but not limited to, location of the well screen (make sure the correct interval will be sampled, screen length (too long of a screen will give diluted samples, potential for vertical conduits (two screened zones in one monitoring well)).

3. The significance of well should be evaluated. If the well is needed to characterize the groundwater for NAVSTA TI, but due to its condition the well must be abandoned, another well may have to be installed next to the abandoned one.
4. Any additional wells installed during the Phase II RI Investigation should be introduced to the quarterly sampling

efforts at NAVSTA TI.

SPECIFIC COMMENTS:

5. Page 8, Table 1: Another column should be added that states whether the well construction log is available and if so at what depth is the well screened.
6. Page 15, Figure 3: Site 6 is one of the most contaminated sites at NAVSTA TI. It should be included in the Tidal Influence Study, so that site-specific data can be analyzed to describe contaminant transport to the bay via groundwater.
7. Page 16, Schedule: How will the schedule be altered considering the expected start date is premature (March 21, 1994)?
8. Page B-6, Footnote b: The Quantitation limits are set lower to meet both MCLs and Aquatic Water Quality Criteria. Please modify footnote to reflect this.
9. Page C-4, Treasure Island Hydrology, 2nd Paragraph: It is stated in the text that water levels for Treasure Island were plotted on a contour map. This map should be included in this document. If a contour map for YBI is available, that should be included also.
10. Page C-6, 2nd Paragraph: Turbidity should be added to the parameters to be measure in the field.
11. Page C-8, Field Measurements: Include the measurement of turbidity as a field measurement.
12. Page C-9, 1st Paragraph: Please describe the manner in which the data will be evaluated from the Tidal Influence study to determine the site-related factors stated in Chapter 5 Integration of Tidal Influence Data to NAVSTA TI RI/FS.

If you have any questions or concerns, I can be reached at the San Francisco Bay Regional Water Quality Control Board at (510) 286-4267.

Sincerely,



Gina Kathuria
Project Manager