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

August 28, 1996

Ernesto M. Galang
EFA, West - Code 1832.5EG
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-2402

Re: Technical Memorandum: Phase IIB Remedial Investigation Additional Characterization at Sites 12 and 17 for Naval Station Treasure Island dated August 19, 1996

Dear Mr. Galang,

The U. S. Environmental Protection Agency (EPA) has received and reviewed the subject document. EPA's comments are enclosed.

If you have any questions, please call me at (415) 744-2383.

Sincerely,

Rachel D. Simons

Rachel D. Simons
Remedial Project Manager
Federal Facilities Cleanup Office

Enclosures

cc: Jim Sullivan, NAVSTA TI
Chein Kao, DTSC
Gina Kathuria, CRWQCB
H-9-2 File
Admin Records (3 copies)
Paul Hehn, RAB Co-chair (Alt)
Pat Nelson, RAB Co-chair

Technical Memorandum: Phase IIB Remedial Investigation Additional Characterization at Sites 12 and 17 for Naval Station Treasure Island (NSTI) dated August 19, 1996

Specific Comments:

1. Section 3.2 Additional Characterization of Site 17, page 5

It appears that groundwater sample 05-HP005, which detected chlorinated solvents, was collected from the top of the water table. Since chlorinated solvents tend to migrate downward, EPA recommends that deeper groundwater samples be collected at sample location 05-HP005 to determine if the contamination has migrated downward. Deeper groundwater samples should also be considered at sample location 05-HP003.

2. Section 3.2 Additional Characterization of Site 17, page 7

Laboratory Analysis

Although it is not explicitly stated, EPA assumes that all groundwater samples will be sent to a certified laboratory for VOC analysis. Please confirm.

3. Section 3.2 Additional Characterization of Site 17, page 7

Monitoring Well Installation

Monitoring well 17-MW01 is screened from 3.5 to 13.5 feet. Since it is possible that the chlorinated solvents may have migrated deeper than 13.5 feet, monitoring well 17-MW01 may not be a good indicator for the extent of contamination. If the additional groundwater sampling shows that the chlorinated solvent have migrated deeper than 13.5 feet, a monitoring well screened deeper than 13.5 feet may have to be installed to define the downgradient edge of the plume.