

MEMORANDUM

TO: Treasure Island Restoration Advisory Board, and Jim Sullivan-NSTI
FROM: Paul V. Hehn, Treasure Island RAB - Technical Subcommittee Chair
DATE: May 19, 1997
RE: Comments on Document:
"Draft Final Interim Groundwater Monitoring Plan"

The following are my comments on the above referenced document.

My comments that have been prepared are related to general issues and to specific sections of the report.

DOCUMENT:

DRAFT FINAL INTERIM GROUNDWATER MONITORING PLAN

Comments on Specific Sections

- Section 4.0 - Monitoring Well Evaluation - Where the two Wells 06-MW05 and 06-MW08 ever located? These wells need to be located and properly abandoned.
- Section 4.2 - Monitoring Frequency and Analytical Rationale - I am glad to see that in the future only filtered metals samples will be used for analysis. This will provide a much more accurate representation of the metals content in the groundwater.
- Section 4.2 - Monitoring Frequency and Analytical Rationale - Was wasn't data more recent than November 1995 used for this evaluation? The more recent data would include the results of more recent sampling and the results from the new wells installed as part of the Phase IIB investigation work. This

ADMIN RECORD (3 copies)

1/3 698
IGWMP

could provide a much better, more complete picture of the groundwater impacts. Reconsider looking at the more recent data prior to finalizing this groundwater sampling plan.

- Section 4.2.2 - Site 06 - Fire Fighting School - Again, need to locate and properly abandon the two wells that were paved over.
- Section 4.2.2 - Site 06 - Fire Fighting School - Recommend that Well 06-MW12 be retained in the well sampling pattern since it is central and downgradient from other impacted wells that are part of the Site 06 plume. Provides potential cross gradient limits of part of the plumes.
- Section 4.2.2 - Site 06 - Fire Fighting School - Before these wells are abandoned or removed from the well sampling plan, have cross-sections been drawn to be sure that the wells that are abandoned and not being sampled have the same groundwater well screen intervals and depths of completion so that the wells retained will provide the same groundwater information as the wells removed?
- Section 4.2.4 - Site 12 - Old Bunker Area and Site 20 - Auto Hobby Shop/Transportation Center - I would recommend that the wells listed for Site 12 be sampled and analyzed at least once for MTBE to be sure there is not any present. If it is not present then it could be eliminated from future sampling with the concurrence of the RWQCB.
- Section 4.2.4 - Site 12 - Old Bunker Area and Site 20 - Auto Hobby Shop/Transportation Center - I would recommend that Well 12-MW06 be retained in the sampling pattern and not abandoned. This well provides the only cross gradient definition of the localized plume defined in this area. It will also provide the third groundwater elevation point to define the groundwater contours for this plume.
- Section 4.2.4 - Site 12 - Old Bunker Area and Site 20 - Auto Hobby Shop/Transportation Center - I would recommend that either Well 20-MW02 or 20-MW03 be retained in the sampling pattern and not abandoned. Either of these well would provide the southern cross gradient limits of the groundwater plume defined in this area as presented on Figure 2. One of these wells is necessary to continue to define the extent of the plume.
- Section 4.2.5 - Site 14/22 - New Fuel Farm and Navy Exchange Service Station and Site 7/10 - Pesticide Storage area/Bus Painting Shop - I would

recommend that Well 14-CW03 continue to be sampled on the same interval as the other wells due it's location between other wells, it's location along the Bay margin and the fact that it is in an area of high concentrations adjacent to the Bay.

- Section 4.2.7 - Site 21 - Vessel Waste Oil Recovery Area - The data from the past sampling of Well 21-MW05 was not included for review with Table 5 of this report. I would recommend that the well continue to be sampled until the data is provided which will support the rationale for no longer sampling this well.
- Section 4.2.10 - Other Site - Site 01 Medical Clinic and Site 09 Foundry - I would recommend that Well 01-MW01 be sampled on an annual basis due to previous high concentrations of mercury and nickel in the groundwater sampled from this well.
- Section 4.3 - Well Repair, Abandonment, and Water Level Monitoring -
 1. Need to find out and compare well completion data on screen intervals and well completion depths to be sure wells being abandoned or no longer being sampled are the same as the wells being retained and sampled.
 2. Well 06-MW12 should be retained.
 3. Either Well 20-MW02 or 20-MW03 should be retained and sampled.
 4. Well 06-MW12 should be retained and sampled annually.
 5. Well 12-MW06 should be retained.
 6. Well 01-MW01 should be retained and sampled annually.
- General Comment on the Data Presentation - As I have recommended in the past, I would again recommend that the data tables be revised to make them more readable and user friendly. Very difficult to read and compare data from separate sampling events.