

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 Remedial Investigation Report - Addendum 2
Additional Characterization at Sites 12 and 17"

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:

ADDITIONAL CHARACTERIZATION AT SITES 12 AND 17

Comments on Specific Sections

- Section 2.0 - Purpose - This section starts off with the statement that the purpose is to define the extent of *localized* contamination. It is not know whether or not the contamination is localized or not as a purpose. This seems to present a pre conceived notion o4r conclusion before the work is even done.
- Section 2.0 - Purpose - By looking only at the additional sampling around Well 12-MW16, this ignores the Again, since the stated objective of the work was to determine the questions about the rest of Site 12. This seems to be a very short sighted viewpoint. Need to look at the big picture of the entire Site 12 as an overall question of delineation of all impacts.

ADMIN RECORD (3 copies)

1/3 700
ADD 2

- Section 2.0 - Purpose - Again, by only looking at a small area of site 17 and not the overall site and the sites that surround it, this does not present the big picture for overall questions of delineation.
- Section 3.1 - Site 12 Field Sampling Approach - Even though there were problems identified with the use and reproducibility of the immunoassay method as presented in the Phase IIB report, here it is being used again for exactly the same constituents as caused problems during the Phase IIB work. Why is it being used again??? What was the reproducibility of the analytical work done by the off site laboratory verses the immunoassay?
- Section 3.1 - Site 12 Field Sampling Approach - Previous sampling and analytical problems with the immunoassay were reported to be a result of motor oil in the sample. Can the same interference result from the heavier fraction that remains from weathered diesel? Was this the cause of most (all?) of the problems with the immunoassay in the past since most of the site detected high concentrations for diesel?
- Section 3.2.1 - Site 12 Soil Sampling Results - Where any of the soil samples from Site 12 for TPH-purgeables checked by analysis at the off site laboratory or are all of the results for TPH-purgeables from the immunoassay methods. Are they reliable and reproducible?
- Section 3.2.1 - Site 12 Soil Sampling Results - TPH-motor oil - Where the motor oil-range petroleum hydrocarbons characterized by the off-site laboratory from the chromatograms? If so, copies of the chromatograms should be included in the appendix.
- Section 3.2.1 - Site 12 Soil Sampling Results - SVOCs - Are there any other choices for the association of the PAHs other than the petroleum hydrocarbons? If so, what are they?
- Section 3.2.2 - Site 12 Groundwater Sampling Results - How was it decided that a concentration of below 1,500 µg/L was a "low" level for TPH-extractables
- Section 3.3.1 - Nature and Extent of Contaminants at Site 12 - Evaluation of Adequacy of Data - Mentions the suspected debris disposal area. What suspected disposal area. Where was (is) it located_ and what did it contain? This should be discussed earlier in the report in either the introduction or the purpose section not just thrown in here.

- Section 3.3.2 - Nature and Extent of Contaminants at Site 12 - Evaluation of Contamination- What is the source or sources of the suggested regional plume? From where?
- Section 4.1 - Site 17 Field Sampling Approach - What were the results of the VOC head-space analysis that determined what soil samples were send off-site to the laboratory for analysis. The report should include this information as part of the boring logs of the geoprobe holes that should also be included in the appendix.
- Section 4.1 - Site 17 Field Sampling Approach - How were the groundwater samples collected at the different depths. This information should be included in the report.
- Section 4.2 - Site 17 Groundwater Sampling Results - Define what is meant by a “low” level for VOCs.
- Section 4.1 - Site 17 Groundwater Sampling Results - Explain why the highest concentration was detected in the intermediate groundwater sample collected from Boring 17-HP10.
- Section 4.3.2 - Evaluation of Contamination - Who determines and how is it determined that plume of chlorinated solvents is “significant” or not? Please explain.
- Figures 1, 2, 3 and 4 - Alternate groundwater isoconcentration contour maps could also be drawn from the data as presented for each of these maps. Not the only interpretation.
- Figure 5 - The map is to busy and very difficult to read, Needs to be uncluttered.
- Figure 6 - According to the contours drawn in this figure, the contaminant is not flowing directly down gradient but across and then down. What is happening here? Unusual flow pattern. Could there be more than one source? Also it appears that the extent of the plume is not defined past 17HP13 and 17HP12.