



July 29, 1997

Department of  
Toxic Substances  
Control

700 Heinz Avenue  
Suite 200  
Berkeley, CA  
94710-2737

Commanding Officer  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
Attn: Mr. Ernesto Galang, Code 1842  
900 Commodore Drive  
San Bruno, CA 94066-2402

Pete Wilson  
Governor

James M. Strock  
Secretary for  
Environmental  
Protection

**DRAFT FINAL INTERIM GROUNDWATER MONITORING PLAN, NAVAL  
STATION TREASURE ISLAND (APRIL 17, 1997)**

Dear Mr. Galang:

The Department of Toxic Substances Control, in conjunction with the San Francisco Bay Regional Water Quality Control Board, has reviewed the Draft Final Interim Groundwater Monitoring Plan dated April 17, 1997. The State's comments are enclosed.

If you have any questions regarding this letter, please contact me at (510) 540-3769.

Sincerely,

Mary Rose Cassa, R.G.  
Engineering Geologist  
Office of Military Facilities

enclosure

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

Ms. Rachel Simons (SFD-8-2)  
U. S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Ms. Martha Walters  
San Francisco Redevelopment Agency  
770 Golden Gate Avenue  
San Francisco, CA 94102

Jim Sullivan, NAVSTA TI  
Richard Knapp, PRC  
Pat Nelson  
Paul Hahn } RAB  
John Allman }  
ARC Ecology  
Admin. Record (3 copies)



COMMENTS ON DRAFT FINAL INTERIM GROUNDWATER MONITORING  
PLAN, NAVAL STATION TREASURE ISLAND (APRIL 17, 1997)

General Comment:

The Navy should (1) evaluate all data, including the most recent data, and (2) obtain consensus from the BCT on data presentation before finalizing this interim groundwater monitoring plan.

Specific Comments:

1. Filtered/Unfiltered Metals Samples (page 7): This section should state that the Navy will consult with the regulatory agencies before reaching a decision on whether only filtered metals samples will be collected in future sampling rounds.
2. Table 2:
  - a. This Table would be easier to use if it included screened interval.
  - b. "Well" 21-MW05 should be included in the Table and identified as a piezometer.
  - c. Wells 25-CMW01, -02, and -03 are shown on the maps, but not included in the Table. Please provide the rationale for not including these wells.
3. Site 6:
  - a. The screened interval is unknown for wells 06-MW11, -12, and -13. For this reason, it is recommended to abandon 06-MW11 and sample 06-MW01 annually. Alternatively, the Navy may want to consider re-completing (or replacing) these wells with appropriate screened intervals.
  - b. Pursuant to the agreement between DTSC and the Regional Board regarding potential CERCLA constituents at the "petroleum-only" sites that were transferred out of the Navy's CERCLA program (see letter from Daniel E. Murphy to Shin-Roei Lee dated June 20, 1997), the Navy should add metals to analytes for Site 06.
4. Site 11: Well 11-MW01 is not included in the data tables (Appendix A), and appears on Figure 3 as 11-MW07. Please correct the discrepancy. The screened interval is unknown for Well 11-MW07. The Navy may want to consider re-completing (or replacing) if it is to be retained in the monitoring program.

5. Site 12: Well 12-MW10 seems to fit the criteria for semiannual sampling (nearshore), not the recommended annual sampling. Well 12-MW06 should be retained for water level monitoring.
6. Site 20:
  - a. Please provide rationale for abandoning well 22-MW02, which seems better placed than well 22-MW01.
  - b. Pursuant to the agreement between DTSC and the Regional Board regarding potential CERCLA constituents at the "petroleum-only" sites that were transferred out of the Navy's CERCLA program (see letter from Daniel E. Murphy to Shin-Roei Lee dated June 20, 1997), the Navy should add metals to analytes for Site 20.
7. Site 24: The value of using the wells in Site 4/19 for down-gradient monitoring is doubtful, since they may not be screened deep enough to detect migrating chlorinated solvents.
8. Appendix A: It would be helpful to include water level data in these tables.