



California Regional Water Quality Control Board

San Francisco Bay Region



Gray Davis
Governor

Ston H. Hickox
Secretary for
Environmental
Protection

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March 15, 1999
File No. 2169.6013

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

Re: Comments on Revised Text of Technical Memorandum Sampling Plan and Health and Safety Plan, Delineation Sampling, Site 12 TPH Contaminated Soil Removal Action, Treasure Island, San Francisco, California (dated March 1999)

Dear Mr. Galang:

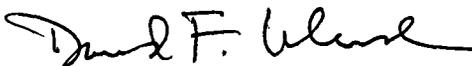
Thank you for submitting the above-referenced revised text. The Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) staff have commented verbally to the Navy on the revised text, and are supplementing the verbal comments with this letter.

Sampling procedures. The sampling procedures should state that if samples collected at the total depth of the hand auger borings indicate the presence of petroleum contamination, the Geoprobe will be used to collect samples from additional intervals at that location. The previous version of this text noted that a sample from hand augered holes will be collected at depths of 6-12 inches below ground surface. This interval has been eliminated from this version. Please explain why this sample was eliminated. Also, it is possible that some locations will show evidence of contamination in the vadose zone, the zone of water table fluctuation, and in the saturated zone. The plan should acknowledge this possibility and note that more than two samples may be submitted for laboratory analysis if site conditions warrant.

While the plan does not mention boring logs, it is the presumption of the RWQCB that boring logs will be prepared for each of the proposed sampling locations, that the logs will record visual observations, PID readings, sample depths, lithology, depth at which is first encountered, and such other information as may be necessary or useful in understanding geologic, hydrogeologic, and contaminant distributions in the area of interest. The RWQCB expects that these logs will be available for agency review.

Thank you very much for your cooperation. If you have any questions regarding these comments, please call me at 510-622-2377.

Sincerely,



David F. Leland, P.E.
Groundwater Protection and Waste
Containment Division

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cc: Mr. James A. Ricks, Jr. (SFD-8-2)
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