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Sent: Friday, October 02, 2009 17:35
To: Sullivan, James B CIV OASN (I&E) BRAC PMO West
Cc: Gary.Foote@amec.com; Remedios Sunga; RStenson@waterboards.ca.gov; Perry,
Charles L CIV NAVFAC SW, BRAC; Hoch, Kevin
Subject: TI - Draft Site 6 Data Gaps Work Plan

Dear Mr. Sullivan:

I have reviewed the subject document and comments provided by the Regional Board (email from Ross Steenson dated Sept 30, 2009) and TIDA (email from Gary Foote dated Oct 2, 2009). I have the following additional comments/questions on the document:

* Section 4.1 Data Gap 1 - Summary of Conceptual Site Model for Dioxins and Furans, Page 4-3: It is unclear from the descriptions here and in Worksheet #17.1 whether the former burn pit is assumed to be associated strictly with fire training activities or could be a pit where waste was brought from other areas for disposal and burned. If the nature of the pit is assumed to be the latter, has the Navy considered the potential for waste items such as those found in Site 12 SWDAs (deck markers, decorative buttons) or contaminants other than dioxins/furans to be present here?

* Figure 5 Proposed Soil Sampling Locations for Dioxins: If physical limitations prevent sampling north of TP031 and TP013, please state the assumptions about dioxin concentrations in this area (e.g., considered consistent with the higher or lower concentration?).

* SAP WORKSHEET #10, Page 37: The former burn pit located on historical aerial photographs was not analyzed for dioxins. Were other constituents analyzed?

* SAP WORKSHEET #17.4 Groundwater Sampling for Total Petroleum Hydrocarbons and Volatile Organic Compounds, Appendix A, Page 83: This worksheet states that the temporary wells will be removed once the DQOs have been attained. The DQOs (Worksheet #11.4) state simply that the wells will be abandoned within 30 days or an appropriate timeframe determined by the Navy (Step 7). It is not clear from the DQOs whether the wells will be removed regardless of the sampling conclusions (Step 5). If the TPH plumes are found to have migrated, will the DQOs be considered met and the wells removed or will they potentially be kept for RI purposes?

Please contact me with any questions about this review.

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