

# DRAFT

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COMMENTS ON THE PRELIMINARY WORKING DRAFT: A2.0 DATA QUALITY OBJECTIVES FOR SITE 2 (~~SLUDGE DRYING BEDS~~) (MAGAZINE ROAD LANDFILL) [dated 9/10/93]

## GENERAL COMMENTS:

1. Similar to Site 12, the upgradient area of Site 2 is dismissed without explanation.
2. Figures depicting COPCs are inconsistent with COPCs as described in the text. PCB results are not included in COPC figures.

In COPC figures, indicate the chemicals that were detected in Phase I that exceed screening criteria (e.g., use an asterisk).

## SPECIFIC COMMENTS:

### A2.1 Site Description

1. This section should discuss the extent of the research (as well as results) to discover whether disposal of radioactive material occurred at Site 2.
2. Was there an EOD area to the north of Site 2 as indicated in the IAS?
3. The site description should indicate that supplies with an expired shelf life were disposed of at Site 2 from the early 1970s to 1979; some of these supplies/wastes may have included liquid chemicals.

### A2.7 Chemicals to be Investigated During Phase II

1. See comments on the DQOs for Site 12.

### A2.9.2 Subsurface Soil

1. The Department does not agree with the hypothesis that subsurface soils at Site 2 do not appear to pose a threat

Site 2 DQOs  
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to groundwater. This hypothesis is based on only one deep boring completed in the landfill area. The hypothesis is not consistent with later statements that Site 2 appears to be a source of TCE and other contaminants to groundwater. The hypothesis should be changed. While no further investigation of subsurface soils may be an option provided the landfill will be capped, deed restricted and groundwater will be adequately monitored/remediated, please see the comments issued by the California Regional Water Quality Control Board dated September 20, 1993.

#### A2.10.1 Shallow Soil

##### Stratum 2 (Stained Area)

1. The depths of the field screening samples are not specified.
2. Should analysis for dioxins be added?
3. TFH diesel and TFH gasoline are COPCs for Stratum 2. These analyses should be added or a justification as to why these constituents are not being investigated further should be presented.
4. A collaborative decision should be made whether a portion of the CLP samples should be used as confirmatory samples for the field screening samples or used entirely as randomly placed samples.

#### A2.10.3 Groundwater

1. Given the depth to groundwater at Site 2, it may be useful to obtain information using CPT prior to the installation of permanent wells..
2. A phased approach to the installation of the new well between 59 and 60 should be considered pending the results from the deeper well adjacent to 60. Collaborative agreement should be reached on the depth and the screened interval for the deeper well adjacent to 60.
3. The rationale section should include a discussion of round one and two PCE/TCE results for wells located downgradient of Site 2 (i.e., Site 5 well results). A phased approach to the installation of the new well cluster should be considered pending the sampling results

from former and Phase II installed wells at Site 2.

4. The last sentence on page 12-15 concerning the detection of VOCs should be qualified.
5. Gross alpha and beta analyses should be added.

**A.2.10.4 General**

1. Analysis for vinyl chloride should be included in the landfill gas survey.

**Figure A2-2b**

1. As stated in the Department's *Technical Memorandum* comments, sample O2\_SA2 is not in Stratum 2; please make the necessary change.

**Figure A2-2c**

1. This figure does not indicate the detection of TRPH at O2\_EF2 (4,555 ppm).