

USEPA REVIEW AND COMMENT
DRAFT APRIL TO JUNE 2000
THIRD QUARTERLY GROUNDWATER
SAMPLING REPORT FOR PARCEL B
HUNTERS POINT SHIPYARD

GENERAL COMMENTS

1. Appendix A. EPA raised this issue at a recent meeting but it appears there may still be some confusion. At IR-10, the trigger levels for VOCs, per table 10 of the 1997 ROD are based on potential for air pathway exposures. However, it appears that the Navy is continuing to use elevated Bay-protection trigger levels. For example, per ROD Table 10, the trigger level for 1,2-DCE is 86 ug/l but per the 3rd quarter report Appendix A table of results at VOC monitoring well IR10MW33A the trigger level is listed as 224,000 ug/l. For TCE the trigger level is 114 ug/l in ROD table 10 but per the 3rd quarter report Appendix A table of results at VOC monitoring well IR10MW33A, the TCE trigger level is listed as 2,000 ug/l. However, the vinyl chloride trigger level used in Appendix A is correct. Since the results for the other VOCs are either below the ROD table 10 trigger level or ND in the third quarter, it is not an issue but the Navy should fix the table of results in future submittals so that the correct trigger levels are used for VOCs at IR-10.

SPECIFIC COMMENTS

3.3 DATA QUALITY

1. The second paragraph of Section 3.3 states: "*Samples from five wells (IR06MW42A, IR07MW28A, IR18MW21A, IR26MW45A, and IR26MW41A) were received at the laboratory at 12 °C, above the required temperature of 4±2 ° C; these wells were subsequently resampled for the CLP VOA and TPH-gasoline analyses. The resampling results appear in this report.*" The analytical results provided in Appendix A, however, do not identify the resampling results. Also, the data validation reports in Appendix D list numerous samples that were received by the laboratory with temperature exceedances (12°C). The analytical results for these contract laboratory protocol-volatile organics analysis (CLP VOA) samples and total petroleum hydrocarbon-purgeables analysis samples (TPH) "*were qualified as estimated due to temperature exceedance.*" Appendix D does not provide validation of resampling results, or mention that resampling was required. Clearly identify, in Section 3.3, the samples associated with each of the five wells that required resampling. In addition, provide the analytical results for the resampling, as well as their corresponding data validation reports.
2. Section 3.3 does not discuss the precision and accuracy of the analytical results. Revise the report accordingly.

APPENDIX B, APRIL TO JUNE 2000 MONITORING WELL SAMPLING SHEETS

3. The Monitoring Well Sampling Sheet for Well No. IR07-MW21A1 indicates that the purge volume is 10.00 gallons. However, the calculation of purge volume (as shown on the sampling sheet) should be 7.57 gallons. Revise the sampling sheeting to correct the purge volume.

APPENDIX C, APRIL TO JUNE 2000 CHAIN-OF-CUSTODY RECORDS FOR SAMPLES

4. The chain-of-custody records provided in Appendix C were compared with the samples listed in Appendix A to verify that sample control was maintained. This review indicated that the chain-of-custody records were in order for the samples listed in Appendix A. There were, however, additional chain-of-custody records provided in Appendix C for other Parcel B RAMP well samples, but their corresponding analytical results were not listed in Appendix A (e.g., chain-of-custody record for samples 0017H010 and 0017H011, which does not list any of the Appendix A samples). Clarify why these additional chain-of-custody records were provided. Alternatively, explain the significance of the additional samples collected at Parcel B RAMP wells (as documented on the chain-of-custody records) and provide the analytical results for these samples.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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August 10, 2000

Mr. Richard Mach
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
BRAC Office
1220 Pacific Highway
San Diego, CA 92132-5190

RE: EPA Review and Comment, Draft Third Quarterly Groundwater Sampling Report for Parcel B, Hunters Point Shipyard, July 14, 2000

Dear Mr. Mach:

EPA has completed its review of the above referenced document. EPA comments on the document are provided as an attachment to this letter.

Should you have any questions about this letter, please contact me at 415-744-2409.

Sincerely,

A handwritten signature in black ink, appearing to read "Claire", with a long, sweeping horizontal line extending to the right.

Claire Trombadore
Remedial Project Manager

cc: Chein Kao, DTSC
John Chester, City of SF
Amy Brownell, City of SF
Brad Job, RWQCB
Jason Brodersen, Tetra Tech
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