



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

5090
Ser 06CH.RM/0426
April 23, 2001

Mr. Chein Kao
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Dear Mr. Kao:

This letter addresses the concerns you provided in your April 18, 2001, letter regarding the Navy's response to comments on the Field Sampling Plan (FSP) Addendum for the Phase II groundwater data gaps investigation, Hunters Point Shipyard (HPS). Based on the responses below, the Navy is not planning to reissue the FSP or the data information package. Following are specific responses to your comments:

1. While preparing the response to agency comments, draft versions of comments were sent to each of the agencies (EPA and DTSC). The Navy ensured that each of the commenting agencies was satisfied with the responses before finalizing the responses and submitting the final FSP. Many of the comments provided by EPA were based on a new technical review person who was not involved in the many scoping meetings for this project. Based on the responses provided, EPA stated they were satisfied with the responses. No additional changes will be made to those responses.
2. The Navy had originally proposed closeout reports for both the chemical oxidation and soil vapor extraction treatability studies in the Federal Facility Agreement (FFA) schedule last summer. Based on an effort by the Base Realignment and Closure (BRAC) Cleanup Team (BCT) to shorten the entire HPS FFA schedule, it was agreed to remove these summary reports as separate deliverables and include a summary of the findings in the Feasibility Study (FS) reports. If DTSC wishes to add these summary reports back into the FFA schedule, please submit an official FFA schedule request to the entire BCT for review and approval. This would extend the Parcel C and E schedules by approximately 90-days each. In the mean time, the Navy will continue to implement the treatability studies and provide periodic updates on the progress to the BCT.
3. The Navy's response regarding additional investigations regarding dense non-aqueous phase liquids (DNAPL) is consistent with discussions during our March 22, 2001 meeting with the DTSC. The groundwater treatability study for chemical oxidation is an appropriate project to address your concerns regarding DNAPLs. As DNAPLs are in groundwater, it would not be appropriate to investigate DNAPLs under the SVE treatability study, as you suggest, since SVE

addresses soil. Once a schedule is prepared to address DNAPLs, it will be proposed to the BCT.

4. The Navy's response did not state "groundwater data from Phase I and II data gaps investigation will not be evaluated until the FS." The response states that "...given the phased approach of the GDGI, significant evaluation of the Phase I data was neither feasible nor appropriate." The intent of the first data package was to provide the data to the BCT. The second data package will contain additional data evaluation based on the previous remedial investigation (RI) data coupled with the two additional rounds of data under this current investigation. It would have been inappropriate to perform trend analyses on the first round of data. This is the approach that was agreed to with the BCT last summer. Additionally, there is no need to change the title of the data information packages, as they are secondary documents.
5. The Navy wishes to clarify that DTSC's reference to the missing well response to comment is incomplete. The response indicated that "...missing wells will be located using global positioning system coordinates and geophysical techniques during ongoing activities at HPS and all wells will be located prior to transfer." The Navy wishes to further clarify that the "missing" wells were simply unable to be located in the field during initial field inspections. These access problems were caused by various situations including overgrown vegetation, parked vehicles, and routine grading operations in unpaved areas. The Navy within the last few weeks has successfully located the majority of these wells, and will strive to locate the remaining wells by July 2001.
6. The Navy will provide construction details for all new wells installed during the GDGI in the data information packages. All construction details for other wells have been provided to the BCT in previous RI reports. The Navy would be open to working with the DTSC to develop a user friendly, basewide-tracking table for the more than 500 wells/piezometers installed at HPS. Once that format is developed, it will be included in the appropriate future data information packages.
7. The Navy included a general sampling rationale in the body of the FSP addendum, and referenced supplemental information in an appendix, consistent with the approach utilized for the Phase I GDGI FSP/QAPP. The DTSC previously concurred with the Navy's chemical analytical program and did not mention this issue during the March 22, 2001 response to comment meeting. Therefore, the Navy does not believe that a revision is required to the FSP.
8. The DTSC's objections to the decision rules are noted; however, the Navy wishes to clarify that based on previous feedback, the DTSC has not objected to the specific action, or lack thereof, taken with respect to these tasks. Specifically, (1) no wells with more than 50% of silt in the screen interval have

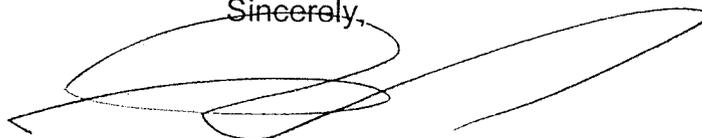
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been decommissioned, (2) all wells used for basewide water level measurement efforts have been re-surveyed, and (3) the DTSC concurred with the Navy's chemical analytical program for Parcel E. Therefore, the decision rules will not be modified.

9. The Navy wishes to clarify that the sampling program is for the first round of sampling at Parcel E. The Navy may propose modifications to the sampling program based on the results of the first sampling round, a comparison of historical data, and input from the regulatory agencies.
10. The Navy's response to comments stated that information regarding light non-aqueous phase liquids (LNAPL) would be included in the Phase II information packages, and wishes to clarify that this information will also be included on the appropriate figures in those packages.
11. The Navy forwarded the available information regarding the iron field test kits to the DTSC on August 4, 2000. The Navy re-distributed this information to the DTSC during a project meeting on March 22, 2001. The comment regarding recording of field data is noted and was addressed in the previous response to comments.

Should you have any concerns with this matter, please contact the undersigned at (619) 532-0913.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard G. Mach Jr.', written over a large, loopy scribble.

RICHARD G. MACH JR., P.E.
BRAC Environmental Coordinator
By direction of the Commander

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Copy to:

Ms. Claire Trombadore (SFD 8-3)
Mr. Michael Work (SFD 8-3)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Mr. Brad Job
California Regional Water Quality Control Board, San Francisco Bay Region
1515 Clay Street, #1400
Oakland, CA 94612

Ms. Amy Brownell
Mr. John Chester
1155 Market Street, 4th Floor
San Francisco, CA 94103

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Typist: R. Mach, 06CH.RM, 2-0913