

April 18, 2001

Commanding Officer
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
San Diego, CA 92132-5190
Attention:Richard Mach

**DTSC'S RESPONSE TO THE NAVY'S RESPONSE TO COMMENTS ON
THE FIELD SAMPLING PLAN ADDENDUM FOR PHASE II
GROUNDWATER DATA GAPS INVESTIGATION, HUNTERS POINT
SHIPYARD, SAN FRANCISCO, CALIFORNIA**

Dear Mr. Mach:

California Department of Toxic Substances Control has completed the review of the Navy's Response to Comments on the Field Sampling Plan Addendum for Phase II Groundwater Data Gaps Investigation.

General Comments

1. **Responsiveness.** The Navy was generally responsive to requests from the Department of Toxic Substances Control (DTSC) for additional information or clarification. Revised tables and figures were provided, as requested--and the Navy has stated that additional information will be provided in the report summarizing the Phase II investigations.

However, in some cases, DTSC disagrees with the Navy's approach (or responses), as noted below.

2. **Minutes.** In responding to the agencies' comments (in particular to USEPA's comments), the Navy frequently made reference to minutes of meetings, to information distributed at meetings (e.g., Information Package Comment 3, below), and to other documents. Minutes are cited by the Navy as documentation supporting the Navy's approach (e.g., sampling rationale). In some

cases, the minutes are treated as more decisive or more important than providing a direct response to the agencies' comments. Such use of the minutes (and to information distributed at meetings) is inappropriate.

If the Navy intends to incorporate the comments or attach the responses to comments to the document, it is inappropriate to refer to meeting minutes or information distributed as handouts in the meeting. A direct response should be provided in the response to comment in order for the records to be complete.

Moreover, the reader of the document (e.g., the public) is not provided with direct answers to questions asked, which is unsatisfactory. In some cases (i.e., for information distributed at meetings), the information is not even part of the public record and is inaccessible to the reader.

All relevant information should be included in the document, which should be designed as a stand-alone document. And, when additional clarification/information is requested by agencies, the Navy should provide a revised document, or include the information/clarification requested in the response to comments.

Field Sampling Plan (FSP) Comments

1. **Comment 2: chemical oxidation evaluation**. When will the Navy provide an evaluation of the chemical oxidation treatability study (TS)? The same question applies to the soil vapor extraction (SVE) treatability study.

Although results of a TS are legitimate part of an FS, the evaluation and conclusion of the treatability study should be reviewed and commented by the regulatory agency prior to be introduced into feasibility Study.

2. **Comment 2: extent of dense non-aqueous phase liquids (DNAPLs)**. In response to DTSC's request for a workplan to determine the extent of DNAPL, the Navy has agreed to provide an addendum to the chemical oxidation TS work plan (WP) that will "explain procedures for evaluating DNAPL". No schedule for this submittal is provided, and it is also not included in the FFA schedule. A schedule should be provided. Also, the Navy should explain why an addendum to the chemical oxidation TS WP is an appropriate approach. For example, why not an addendum to the SVE TS?

DTSC's question on DNAPL related to determination of the extent of DNAPL. It would be odd indeed to get a proposal for determining the extent of DNAPL after the TSs are complete,

especially if the TSs turn out to be the remedy.

3. **Comment 9: groundwater data evaluation.** The Navy states that groundwater data from Phase I and II data gaps investigation will not be evaluated until the FS. The data should be evaluated as part of the data package. In addition, to eliminate continued ambiguities regarding the objectives and contents of the “information package”, DTSC recommends that the “information package” should be changed to Phase I and II Groundwater Data Gaps Investigation Report in the Federal Facilities Agreement (FFA) schedule.

It is not appropriate to defer data evaluation to the FS for the same reason as stated in comment 1. Above. It is incumbent on the Navy to interpret data, not to just present data. Data evaluation and interpretation discussions must be reviewed and commented before its conclusions are introduced into FS.

4. **Comment 10: location of wells.** DTSC asked when the Navy will find missing wells, and the Navy responded that all wells will be located “prior to transfer”. “Lost” wells are significant RCRA violations and are of strong concern since they may impact the validity of other well results, may be physical hazards, and represent substantial liability as well.

The Navy should provide a schedule for finding all missing wells and provide an inventory of all wells that have been constructed in the shipyard.

5. **Comment 12: well construction table**

DTSC had asked that the Navy include a table which shows well construction details and well status for all wells. The Navy responded that a well construction table “for all newly installed wells” will be included in the Phase II and III information packets. It is partially responsive for the Navy to provide a table for new wells.

However, DTSC requires that the Navy develop a well construction table for all wells. It is customary to include such a table in any groundwater sampling WP or report. It is necessary for evaluation of the data. For example, in order to interpret results, it is necessary to know the screened interval for each well.

Also, in comment 10, the Navy states that “the feasibility of preparing a separate well survey report” will be “discussed”. A summary report on the condition of all wells on the base will be required by DTSC prior to the conclusion of groundwater data gap investigation. A base-wide summary would be most useful. Nonetheless, why should this activity be postponed until transfer, if

it is pertinent to ongoing investigations and to the decision-making process?

Please provide the table in the Phase II data gaps report (for reference during data evaluation). The table should be updated as needed between now and transfer.

DTSC has noted some problems with tracking corrective actions for wells (in DTSC's comments and in subsequent discussions with the Navy). The table could also serve as a tracking table for corrective action for wells, by the addition of a "Comments" column.

6. **Comment 18: minutes.** DTSC asked (as did USEPA) that rationale for sampling for Parcel E be included in the document. The Navy referred instead to an information packet that was distributed in October for a meeting that was held in November 2000, which was included as an attachment to the document. Although it may be useful to attach minutes and other information to a document, it is appropriate for sampling rationales to be included in the body of a field sampling plan.

Information Package Comments

1. **Disagreeing with decision rules.** DTSC disagrees with the following Navy's decision rules,

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If a well screen is covered with silt for 50% of its length (or three feet, whichever is greater), the well will be abandoned.

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A group of wells will be resurveyed only if results from a previous group of wells indicate divergence from original survey data (by .05 feet or greater) in 30% of wells.

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The rationale for Parcel E well sampling.

2. **Parcel E sampling rationale.** The Navy's proposed analytical program is generally acceptable (as shown on sample collection tables). However, the decision rules do not take into account all relevant factors. For example, plume definition. Plumes are defined as extent of contamination in groundwater. So the rule should allow for collection of analytes at wells for which there are no exceedences of criteria, in order to determine plume boundaries. Also, collection of suites of compounds (e.g., PAHs, metals) or associated compounds (e.g., TPH) should be allowed. And,

exclusion based on frequency is not fully acceptable for small data sets.

3. **Comment 4: extent of LNAPL.** DTSC asked that information on extent of LNAPL be included on ground water elevation maps. The Navy should confirm that the extent of LNAPL will be indicated on groundwater maps.

4. **Comment 5: iron.** DTSC asked for additional information on the field test kit used for Fe⁺². The Navy responded that instructions for the field kit were provided to DTSC at a meeting. The instructions provided should be included in this submittal, as part of the packet that is provided to all agencies. Please note that the instruction packet only contains information for the field crew on how to collect the sample. Other information requested by DTSC should be provided by the Navy, regarding sensitivity of the test, interferences, QA/QC lab duplicates, etc. A full discussion on the test kit should be provided.

In addition, Fe⁺² data collected in the field should be included in a systematic manner on field log sheets which are submitted for review to the agencies.

If you have any questions, Please contact me at (510) 540-3822.

Sincerely,

Chein Ping Kao, P.E.
Senior Hazardous Substance Engineer
Office of Military Facilities

CC: Ms. Sheryl Lauth /Claire Trombadore
US EPA Region IX
75 Hawthorne Street
San Francisco, California 94105-3901

Mr. Brad Job
California Regional Water Quality Control Board
San Francisco Bay Region

**1515 Clay Street, Suite 1400
Oakland, California 94612**

**Ms. Amy Brownell
c/o John Chester
San Francisco Public Utilities Commission
1155 Market Street, 4th Floor,
San Francisco, Ca 94103**