



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

San Francisco Bay Region



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HUNTERS POINT
SSIC NO. 5090.3

Governor

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Date: June 16, 2000
File No. 2169.6032 (LBJ)

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

**Subject: Comments on Draft Field Sampling Plan for Phase I Data Gaps Investigation,
Hunters Point Shipyard, San Francisco, California**

Dear Mr. Mach:

Regional Board staff have reviewed the document titled *Draft Field Sampling Plan for Phase I Data Gaps Investigation, Hunters Point Shipyard, San Francisco, California* dated June 1, 2000 (FSP). In general, the FSP is well written and concise and proposes a sound approach to address much of the remaining uncertainty regarding groundwater conditions at the site. We also briefly reviewed the accompanying quality assurance project plan and will defer to the U.S. Environmental Protection Agency's (USEPA) comments on this document. We have identified the following comments on the FSP:

1. We understand that groundwater data gaps may also exist on Parcel E. Please mention that the purpose and objective of this particular phase of work is focused on Parcels C and D. Additional work may be required for Parcels C and D, depending on the outcome of Phase I, and for Parcel E, pending additional evaluation of groundwater conditions there.
2. Section 4.3.4 – Sample Analysis: To prevent the problems associated with “fizzing” of hard groundwater when HCl or H₂SO₄ are used as preservatives in volatile organic chemical (VOC) samples, we encourage the Navy to investigate the use of solid NaHSO₄ as a preservative. Alternatively, if unpreserved VOC samples are collected, it is our understanding that allowable holding times must be reduced.
3. Section 4.4 – Well Installation: Please describe how well screen lengths and depths will be determined. For A-aquifer wells, we request that the screen extend at least one foot above the highest seasonal groundwater elevation.
4. Although Table 4-4 shows that oxidation-reduction potential (ORP) will be measured in numerous wells, we could not identify a location where this is described in the text or in Tables 4-5 and 4-6. Please state explicitly in the text where, why, and how these data will be collected. As was discussed in our letter dated June 8, 2000, Regional Board staff find measurements of dissolved oxygen concentration (DO) and ORP to be very useful in evaluating groundwater contamination and natural attenuation and believe that measurements are more accurate when done in-line with the monitoring

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- well purging parameters. Please investigate the potential for collecting DO and ORP data along with the other well purging parameters.
5. Please state explicitly if extractable petroleum analysis will or will not incorporate silica gel cleanup.
 6. Table 4-4 states several times that Aroclor 1260 is the only PCB analyte of concern, while this may be the case, please provide assurance that all analytes in the PCB/pesticides method will be reported by the laboratory and all detections will be noted.
 7. Please provide a narrative description of the beneficial use analysis referenced in Tables 4-5 and 4-6. Since this appears to be a significant objective of the FSP, it seems appropriate to explicitly identify and describe the metrics for this objective.
 8. We have received USEPA's comments on the FSP and concur with their assessments.

If you have any questions regarding this matter, please feel free to contact me at (510) 622-2400 or by email at lbj@rb2.swrcb.ca.gov.

Sincerely,



Brad Job, P.E.

Assoc. Water Resources Control Engr.

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Mr. Richard Mach

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June 8, 2000

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