



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

June 13, 2000

Mr. Richard Mach  
Southwest Division Naval Facilities  
Engineering Command  
1220 Pacific Highway  
San Diego, CA 92132-5180

**SUBJECT: DRAFT FIELD SAMPLING PLAN FOR PHASE I GROUNDWATER DATA  
GAPS INVESTIGATION**

Dear Mr. Mach:

The Environmental Protection Agency (EPA) has completed review of the subject document dated June 1, 2000. Our comments regarding Parcel C are included in Attachment 1. Comments specific to Parcel D and from our Quality Assurance Office will be submitted under a separate cover. If you have any questions regarding these comments, please call me at (415) 744-2387.

Sincerely,

A handwritten signature in cursive script that reads "Sheryl Lauth".

Sheryl Lauth  
Remedial Project Manager

cc: Mr. Chein Kao, DTSC  
Mr. Brad Job, RWQCB  
Mr. Jason Broederson, TTEMI  
Ms. Karla Braesemle, Weston  
Ms. Claire Trombadore, EPA  
Ms. Amy Brownell, City of SF  
Ms. Julie Crosby, Navy

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**COMMENTS ON THE DRAFT  
FIELD SAMPLING PLAN FOR PHASE I  
GROUNDWATER DATA GAPS INVESTIGATION**

General Comments

1. Please explain briefly how the water level and water quality data will be reported and incorporated into the Feasibility Study.
2. The beneficial use analysis referenced in Table 4-5 should be discussed as part of Section 2.0.
3. It would be helpful to have one additional figure that included both the wells proposed for re-sampling and installation for easier reference.
4. We would suggest that once the water level data have been interpreted and groundwater gradients confirmed, the BCT briefly revisit the well re-sampling/installation locations to ensure that groundwater samples are collected in the appropriate locations for adequate plume definition.
5. Please reference the possibility of a Phase II investigation mentioned during the scoping meetings and how this data may be incorporated into the overall groundwater strategy, if collected.

Specific Comments

1. Please clarify whether new wells will be installed in sufficient time to be included in the first water level data collection round. In many cases, particularly when B-aquifer wells are to be installed, it would be helpful to include these wells in the water level measurements. For example, in IR-28 there are only four B-aquifer wells selected for water level measurements, but nine new B-aquifer wells will be installed, more than tripling the amount of data that could be available. Similarly, there are no B-aquifer wells in IR-25, but three will be installed.
2. Is it possible to redevelop IR06MW45A before water levels are taken so that it can be included in the water level measurement group? Inclusion of this well would give a more complete picture of the water table in the vicinity of IR-25, since there are no nearby wells to the east and southeast.
3. Very little water level data will be collected from the area within RU-C1, although water levels will be collected from wells around this RU. There are many wells that need to be surveyed in this area. Some of them, like RI28MW33A, IR28MW340A, IR 28MW338A and IR28MW324A should be surveyed and included in the water level measurement group.
4. Since PCBs are a concern in IR-25, and PCBs would be more likely to be found in product than in water, the Navy should consider sampling the product in IR25MW11A and IR

25MW-22A for PCB analysis. These samples should be collected without purging the wells.

5. Figures 4-1 and 4-2. Some of the wells are not labeled. For example, there is a black dot indicating an A-aquifer well on either side of IR28MW155A that do not have labels. Are these actual wells? If so, it is unclear why well IR28MW155A was selected for sampling and not one of these other wells, particularly since the eastern dot appears to be closer to the well with product (IR28MW129A).
6. Since one of the objectives for sampling IR29MW57A is to confirm the extent of RU-C4 and RU-C7, it is unclear why VOC analysis is not included.