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MOFFETT FIELD
SSIC NO. 5090.3

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

April 22, 1993

Mr. Stephen Chao
Naval Facilities Engineering Command
Western Division
900 Commodore Way, Bldg. 101
San Bruno, CA. 94066

Re: Draft Final Additional Tank and Sump Field Investigation
Technical Memorandum, dated March 22, 1993

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document. Although not noted, this is a draft final document. Response to Comments on the draft version of this memorandum were used in the review process. Concerns presented to the Navy upon review of the draft memorandum were addressed satisfactorily, with two exceptions.

1. EPA does not agree that enough investigation has been done to conclusively eliminate Sump 91 as a VOC contaminant source. It appears that the analytical results from borehole SBS91-001 data are inconclusive. EPA does not believe that contaminant could have migrated upwards through the moist plastic clay layer that exists between approximately 17 and 18.5 feet below ground surface. It seems improbable that migration of contaminant through this layer is possible in either vertical direction. Therefore, Sump 91 should still be considered to be a potential source for TCE contamination. EPA believes that further investigation is necessary before a conclusion can be made.

It should also be noted that in the Draft Horizontal Conduit Study Field Investigation Work Plan, dated March 23, 1993, Sump 91 is referred to as being in proximity to a "known source area". This appears in Section 5.1.1.2 (Wire Tracing) on p. 18. This may be an improper conclusion, but its reference could not to be overlooked.

2. The remaining concern deals with the uncertainty associated with the data validation procedures, originally presented in EPA's general comments of the draft document.

EPA requested documentation to support the data validation and laboratory quality control procedures. The Navy responded by stating that "all data...have been reviewed or validated by an independent validation firm..." and that "Appendices B and C have been modified to indicate this review." The only revisions made to Appendices B and C were the

incorporation of data qualifiers, for both soil and groundwater. The data qualifiers do not correspond one-to-one with current Contract Laboratory Program (CLP) data qualifiers. Some are data validation qualifiers, while others are CLP laboratory data qualifiers. In addition, the combination of a "U-B" qualifier is applied in Tables B-1 and C-2. Use of this combination is "expressly prohibited" by the CLP Statement of Work for Organics Analysis (OLM01.8, August 1991).

The qualifiers "J-ED", "J-MD", "J-N", "BJ", and "JNB" are used in tables in both appendices; however, no explanation is provided to support their use. The last sentence of the data qualifiers key is a statement regarding use of the "UJ-LS" qualifier. This qualifier is not in the key nor is it used in tables in either appendix. It is stated that "UJ-LS indicates the sample quantitation limit is estimated because internal standard recoveries and surrogate recoveries are out of QC limits." At what point would the Navy's designated laboratory rerun these samples or recalibrate their instruments? What level of confidence can be placed on these values?

Not only should all data be presented in a manner that removes doubt as to its having been validated, but all qualifiers must be properly addressed if they are to be of utility in the data evaluation process.

Well W53-2(A1) in Table C-1 is flagged with a "B" qualifier beside the 9 μg/L detection for TCE. The "B" qualifier is not presented in the key as a data qualifier. Use of the "B" qualifier as a CLP laboratory data qualifier indicates that the concentration detected is blank contamination. If this is blank contamination, is it from a field, laboratory method, or trip blank? How did it get there? TCE is not a common laboratory contaminant.

It is not the intent of these two comments to invoke dispute as described in the Federal Facilities Agreement. But please provide written response to them. Call me at 415-744-2383 if you have any questions.

Sincerely,

Michael D. Gill

Michael D. Gill
Remedial Project Manager
Federal and Technical Programs Branch

cc: Elizabeth Adams (RWQCB)
Josh Marvil (PRC) (Fax)
Fred Molloy (SAIC)
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