



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

July 19, 1994

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

Re: Draft Additional Petroleum Sites Investigation Technical Memorandum, dated June 10, 1994

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and submits the following comments. Call me at 415-744-2383 if you have any questions.

General Comment

1. Validation of certain data was in progress and not completed in time for this report. Be sure to point out any discrepancies between the validated and unvalidated data in the draft final version of this document.

Specific Comments

1. Tables 4, 5, 6, 7, 9, 10. Please provide a footnote explanation why certain contaminant types were not analyzed (NA designation).
2. Tables 4, 7 and 10. These tables have footnotes which indicate that certain contaminants were detected at levels below their detection limits. Please indicate these detection limits.
3. Section 5.1, pages 16,17. It would make sense that the Close Analytical Support Laboratory (CSAL) sample concentrations are higher than the (unvalidated) composite sample concentrations from the state certified laboratory for at least two reasons. VOCs are more easily volatilized during composite sampling by virtue of the sampling technique. Also, since there is essentially no holding time after CSAL sample collection, concentrations will be higher. There appear to be huge discrepancies between the two samples sets, sometimes as much as 3 orders of magnitude. The sentence on page 17 stating that the differences "are likely attributable to small scale differences in contaminant distribution within a heterogeneous soil profile and the relatively smaller quantity of samples collected for the CSAL analysis" is not enough reason to eliminate the CSAL samples. Until the validated

data returns from the state certified laboratory, it may be premature in making a decision about which data is more useable. Even then, if such discrepancies still exist, it may be necessary to resample the questionable areas. It may be useful to examine two maps similar to Figure 3, one with CSAL concentrations plotted and the other with state certified, validated concentrations plotted and observe the discrepancies.

Sincerely,



Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

cc: C. Joseph Chou (DTSC)
Ken Eichstaedt (URS)
Ron Gervason (RWQCB)
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