



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

September 16, 1997

Mr. Stephen Chao
Naval Facilities Engineering Command
Engineering Field Activity, West
900 Commodore Way, Bldg. 210
San Bruno, CA. 94066-2402

Re: *Draft Site 1 Postclosure Monitoring Plan*, dated August 1, 1997

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and provides the following comments. If you have any questions, please call me at 415-744-2385.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Gill".

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

cc: J. Chou (DTSC), K. Eichstaedt (email), T. Mower (PRC) (email),
S. Olliges (email), M. Rochette (RWQCB), P. Strauss (email)

COMMENTS

Draft Site 1 Postclosure Monitoring Plan, dated August 1, 1997

1. Section 5.1, page 8, para 2. The first sentence states "If detection monitoring results provide evidence of a release...". Please elaborate on what this evidence would be, as in the Final OU1 ROD (Section 2.10, Selected Remedy, bottom of page 56).
2. Section 5.1, page 8, last para. The text states: "A corrective action program...will be implemented, if necessary...". Please add language here that is consistent with the Final OU1 ROD.
3. Section 5.2.1, page 9, para 1. Please list the COCs that appear in Appendix I of 40 CFR 258. It is unclear why metals are only sampled once every 5 years (shown in Table 5-1). In addition, why are SVOCs, pesticides and PCBs left out of the COCs to be sampled in Table 5-1?
4. Section 5.2.2, page 10, top of page. "The concentration limit for each constituent at each well will be developed...". Why set different limits for the same COC at different wells? When will these limits be set? At each sampling round?
5. Section 5.4.6, page 17. What percentage of data will be validated? Please add this to the text.
6. Section 5.5, page 17-21. Any statistical tests used should be consistent with those defined in 23 CCR, as this is an ARAR in the OU1 ROD.
7. Section 7.0, page 21. The second sentence states "The quarterly report will be included as a subsection of the MFA annual report". Presently, we do not get a MFA Annual Report. Is this a new submittal? We believe the postclosure monitoring results should be included as a subsection of the site's quarterly report. Otherwise, the agencies are only provided status annually, instead of quarterly.
8. Figure 5-1. Please add a groundwater flow direction arrow to this map.
9. All figures of Site 1 should be modified to reflect post construction features and surfaces since the work described in this document will be performed after the cap is completed. For example, the pistol range should be eliminated.