N30519_000132
NFD POINT MOLATE
SSIC NO. 5090.3.A

PRC Environm
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PRC

November 6, 1995

Mr. Dean Sakakihara
Department of the Navy
Engineering Field Activity West
Naval Facilities Engineering Command
900 Commodore Drive, Building 206, Second Floor
San Bruno, California 94066-2402

CLEAN Contract Number N62474-88-D-5086 (CLEAN'I)
Contract Task Order (CTO) 0248

Subject: **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Hazardous Substances Detected at Naval Fuel Depot (NFD) Point Molate**

Dear Mr. Sakakihara:

As you requested, PRC Environmental Management, Inc. (PRC) has reviewed chemical data obtained during investigations at NFD Point Molate to identify contaminants at each installation restoration (IR) site that may be regulated under CERCLA. Attachment 1 summarizes contaminants detected at each IR site that are designated as hazardous substances under Section 102(a) of CERCLA, as listed in Section 302.4 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). Data supporting Attachment 1 are given in Attachment 2.

As shown in Attachment 1, soil and groundwater samples from each of the four IR sites at NFD Point Molate have shown detectable quantities of CERCLA hazardous substances, including chlorinated solvents, metals, pesticides, and polycyclic aromatic hydrocarbons (PAHs).

PAH contamination at IR Sites 1, 3, and 4 may be a result of fuel tank and pipeline releases or tank bottom sludge disposal. (Conventional chemical analyses do not distinguish tank bottom sludge-related contaminants from fuel-related contaminants.) Tank bottom sludge was reportedly disposed at IR Sites 1 and 3; and tank bottom sludge contaminants may have migrated from these sites to IR Site 4. As we have discussed, tank bottom sludge may not be covered under the CERCLA petroleum exclusion. Therefore, contamination at IR Sites 1, 3, and 4 may fall under CERCLA jurisdiction.

In addition, as seen in Attachment 2, low concentrations of chlorinated solvents commingle with petroleum contamination in groundwater at IR Sites 3 and 4. PRC believes these commingled plumes may be covered under CERCLA authority.

The considerations presented above regarding application of CERCLA authority at NFD Point Molate should be discussed with Navy legal counsel. Please call me at (303) 312-8883 if you have questions or comments regarding this matter.

Sincerely,

Jeffrey Reichmuth, P.E.
Project Manager

cc: Debra Judy, PRC
David West, PRC
Chris Pytel, PRC

ATTACHMENT 1

NFD POINT MOLATE
CERCLA HAZARDOUS SUBSTANCES DETECTED AT IR SITES

CERCLA Hazardous Substances	IR Site 1	IR Site 2	IR Site 3	IR Site 4
Chlorinated Solvents				
1,1 Dichloroethene (DCE)				X
1,2 DCE			X	X
Trichlorethene (TCE)			X	X
Chloroform			X	X
Vinyl Chloride				X
Chlorobenzene			X	
Carbon Tetrachloride				X
1,1 Dichloroethane				X
1,1,1 Trichloroethane				X
Metals				
Chromium		X		
Lead		X		
Nickel		X		
Zinc		X		
Polycyclic Aromatic Hydrocarbons				
Acenapthene	X		X	X
Anthracene	X			
Chrysene	X		X	X
Fluoranthene	X		X	X
Fluorene	X		X	X
Naphthalene	X			
Pyrene	X		X	X
Pesticides				
Chlordane	X			
4,4' DDD	X			
4,4' DDE	X			
4,4' DDT	X			

ATTACHMENT 2

SUPPORTING DATA

U.S. EPA - CLP

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INORGANIC ANALYSIS DATA SHEET

EPA SAMPLE NO.

A02015

Lab Name: MID-PACIFIC ENVIRONMENTAL Contract:

Lab Code: MPELI Case No.: SAS No.: SDG No.: U7015

Matrix (soil/water): SOIL Lab Sample ID: 940701502A

Level (low/med): LOW Date Received: 07/05/94

% Solids: 99.0

Concentration Units (ug/L or mg/kg dry weight): MG/KG

IR-Site 02 Metals

CAS No.	Analyte	Soil Background Concentration Arithmetic Mean		C	Q	M
7429-90-5	Aluminum		1740			P
7440-36-0	Antimony		9.5	B	N	P
7440-38-2	Arsenic		0.63	U		P
7440-39-3	Barium		23.6	B		P
7440-41-7	Beryllium		0.08	U		P
7440-43-9	Cadmium		0.12	U		P
7440-70-2	Calcium		1240			P
7440-47-3	Chromium	28.4	894			P
7440-48-4	Cobalt		21.0			P
7440-50-8	Copper		26.2			P
7439-89-6	Iron		22800			P
7439-92-1	Lead	11.3	114		N	P
7439-95-4	Magnesium	4400	36400			P
7439-96-5	Manganese		400		N	P
7439-97-6	Mercury		0.05	U		AV
7440-02-0	Nickel	22.7	945		*	P
7440-09-7	Potassium		336	B		P
7782-49-2	Selenium	ND	0.46	U		P
7440-22-4	Silver	ND	0.40	U		P
7440-23-5	Sodium		255	B		P
7440-28-0	Thallium		0.40	U		P
7440-62-2	Vanadium		12.3			P
7440-66-6	Zinc	45	229		N*	P
57-12-5	Cyanide					NR

Avg metals in soil

grit results

lor Before: BROWN Clarity Before: Texture: COARSE

lor After: COLORLESS Clarity After: Artifacts: NO

mments:
CLIENT_ID=GS04-02
A02015

Sandblast Grit

U.S. EPA - CLP

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INORGANIC ANALYSIS DATA SHEET

EPA SAMPLE NO.

A01015

Lab Name: MID-PACIFIC ENVIRONMENTAL Contract:

Lab Code: MPELI Case No.: SAS No.: SDG No.: U7015

Matrix (soil/water): SOIL Lab Sample ID: 940701501A

Level (low/med): LOW Date Received: 07/05/94

% Solids: 98.6

Concentration Units (ug/L or mg/kg dry weight): MG/KG

CAS No.	Analyte	Soil Background Concentration Arith. Mean	C	Q	M
7429-90-5	Aluminum	2460			P
7440-36-0	Antimony	11.0	B	N	P
7440-38-2	Arsenic	0.63	U		P
7440-39-3	Barium	55.1			P
7440-41-7	Beryllium	0.08	U		P
7440-43-9	Cadmium	0.60	B		P
7440-70-2	Calcium	2450			P
7440-47-3	Chromium	28.4 [redacted]			P
7440-48-4	Cobalt	31.9			P
7440-50-8	Copper	46.0			P
7439-89-6	Iron	26500			P
7439-92-1	Lead	11.3 [redacted]		N	P
7439-95-4	Magnesium	4400 [redacted]			P
7439-96-5	Manganese	487		N	P
7439-97-6	Mercury	0.05	U		AV
7440-02-0	Nickel	22.3 [redacted]		*	P
7440-09-7	Potassium	615	B		P
7782-49-2	Selenium	ND [redacted]	U		P
7440-22-4	Silver	ND [redacted]	U		P
7440-23-5	Sodium	330	B		P
7440-28-0	Thallium	0.41	U		P
7440-62-2	Vanadium	16.4			P
7440-66-6	Zinc	95 [redacted]		N*	P
57-12-5	Cyanide				NR

Color Before: BROWN Clarity Before: Texture: COARSE

Color After: COLORLESS Clarity After: Artifacts: NO

Comments:
CLIENT_ID=GSD4-01
A01015