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TREASURE ISLAND
SSIC NO. 5090.3.A



November 4, 1999
Project 005553.004.0

Via Facsimile and U.S. Mail

Mr. Ernesto Galang
Engineering Field Activity, West
Naval Facilities Engineering Command
Bldg. 208, 2nd Floor
900 Commodore Drive
San Bruno, California 94066-2402

Subject: Draft Field Sampling Plan Addendum for Investigation of
The Elementary School Area
Naval Station Treasure Island
San Francisco, California

Dear Mr. Galang:

This letter presents comments resulting from a review of the October 28, 1999, Draft *Field Sampling Plan Addendum for Investigation of the Elementary School Area*, which was prepared by Tetra Tech EM Inc. (TtEMI), on behalf of the Department of the Navy Engineering Field Activity West (the Navy). This review was performed by Geomatrix Consultants, Inc. (Geomatrix) and Olivia Chen Consultants (Olivia Chen) on behalf of the City and County of San Francisco, Mayor's Office, Treasure Island Project (the City). Our comments on the Draft are as follows:

- Page 1, Section 1.0, 3rd paragraph, and subsequent similar descriptions - The elementary school location is difficult to describe unambiguously with respect to the boundaries of Site 12 because of the complicated shape of Site 12 and the school's location within the area encompassed by the "arms" of Site 12. This is not clear from the particular map used for Figure 1. It might be clearer to specify that the stated distances to the school are measured from the *nearest* boundaries of Site 12. Figure 1 also would be clearer if the full names of Avenue E and 13th Street were shown near the school.
- Page 1, Section 2.0, 2nd paragraph - We suggest using the word "area" rather than the word "feature" throughout the discussion of the anomalous surface texture.
- Page 2, Section 2.0, 1st full paragraph - Please clarify that though both trenches and borings were excavated for the geotechnical investigations, no trenches were excavated on or near the school grounds so that the data from Boring B-29 are the only historical exploratory data relevant to this investigation.
- DQO Step 1, Problem Description - Please see the first comment above, relating to site description.
- DQO Step 3, Identify Inputs to the Decisions - To avoid confusion, we believe "debris or stained or odorous soil" should be substituted for "soil" in the second bullet and "for soil"

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should be deleted from the third bullet. Those bullets also might be moved to the end of the list to reflect the probable order of collection and use of information.

- DQO Step 4, Define the Study Boundaries – Please give explicit boundaries to the study area so that the relationship between the number and locations of proposed test pits and the area of investigation can be readily seen and, if results are favorable, a clearly defined area can be considered “cleared.”
- DQO Step 6, Specify Acceptable Limits on Decision Errors – The basis for the acceptability of the decision error in the first bullet should be explicitly stated. The acceptable minimum-detectable target size proposed here is a circle 60 feet in diameter. That is more than twice as large, on an area basis, as the proposed minimum-detectable target proposed for the Mariner Drive study area in the October 12, 1999, Draft Appendix A, *Data Quality Objectives, Additional Investigation in the Vicinity of Buildings 1202, 1217, 1228, and 1230*. What is the basis for this change?
- DQO Step 7, Optimize Sampling Design

- Please revise the first bullet to reflect response to our previous comment for DQO Step 6. In addition, the first bullet does not appear to clearly reflect the actual test-pit excavation and sampling plan described earlier. For example, it suggests that samples will be collected from all 12 test pits.

The bullet should be revised to state more clearly that: 1) there will be 11 test pits located on a grid, with a twelfth located within the grid boundaries at the site of the former mound, 2) test pit 12-TPES001 will be sampled at depths of 0.5 to 1.0 and 3.5 to 4.0 feet, regardless of field observations of materials exposed in that pit, in order to maintain consistency with the sampling scheme for the former Storage Yard, 3) except for the previously described special sampling at Test Pit 12-TPES001, samples will only be collected if specified field-screening conditions are observed, 4) where the specified field observations are made, samples will be collected in accordance with a specified approach for determining the number of samples collected and the specific materials that will be sampled, 5) samples may be taken of stained or odorous soil or debris (not just soil), as appropriate under the sampling specification. Most of this is stated elsewhere in the plan; perhaps it can be incorporated by reference in this bullet.

- The second bullet indicates that the decision of whether to test for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), pesticides, or polychlorinated biphenyls (PCBs) will be based on field screening for odors and “significant” photoionization detector (PID) readings. Section 4.1, on the following page, refers to discussions during the September 17, 1999, Base Closure Team meeting as the basis for the analytical program. The draft table of proposed sampling and analyses for various areas in and near Site 12 that was handed out during the



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September 17, 1999, meeting indicates that the full suite of analyses (VOCs, SVOCs, pesticides, and PCBs) would be performed in all samples from the school. We suggest that all samples be analyzed for all of the listed parameters.

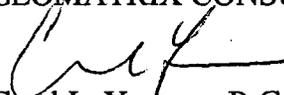
Additionally, the proposed screening tools may not give reliable indications of the presence of all the potential analytes. For example, the presence of pesticides may not be indicated by either odor or PID reading.

We note that the technical issue behind this comment also applies to Section 4.4 (page 4) of the October 6, 1999, Draft of the *Field Sampling Plan Addendum for Additional Investigation in the Vicinity of Buildings 1202, 1217, 1228, and 1230* (Mariner Drive), although the comment may have been accidentally omitted from our earlier submissions on the Mariner Drive program. The Mariner Drive area was not, however, included in the draft table handed out during the September 17, 1999, meeting.

- Pages 8 and 9, Section 4.3 – Please see the preceding comment.
- Table A-1 – This table should be revised, as necessary, to reflect changes made in response to these or other comments.
- Test Pit Closure/Reporting and Schedule – This section should state that work will be performed during hours that school is not in session and test pit closure will be completed before the next school day.
- Contingency Procedures – The plan does not present procedures for (1) evaluating the presence of hazardous materials that would trigger an immediate response, or (2) contingency procedures (course of action, notifications) in the unlikely event that hazardous conditions are encountered.

If you have any questions about these comments, please call me at (510) 663-4289.

Sincerely yours,
 GEOMATRIX CONSULTANTS, INC.


 Carol L. Yamane, R.G.
 Senior Hydrogeologist

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cc: Martha Walters, San Francisco Redevelopment Agency
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