

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
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(510) 540-3729

July 30, 1993

Commanding Officer
Western Division
Attn: Mr. Ernesto Galang, Code 1813
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-0720

Dear Mr. Galang:

DATA QUALITY SUMMARY REPORT FOR THE REMEDIAL INVESTIGATION PHASE I, NAVAL STATION TREASURE ISLAND

The staff of the Department of Toxic Substances Control (Department) has completed our review of the Remedial Investigation Data Quality Summary Report (DQSR) dated May 19, 1993 for Naval Supply Center Treasure Island. The DTSC would like the Navy to respond to the following comments. These comments should, where appropriate, be incorporated into the draft Remedial Investigation Report and the draft Work Plan for the RI Phase II.

Comments of the Department of Toxic Substances Control

1. Page 1, Section 1.0 INTRODUCTION

This report presents the chemical and quality control data gathered during the Phase I RI field effort and provides recommendations for work to be done during the Phase II field effort. This report does not, however, support Navy's conclusions for No Further Action at several of the RI sites. Because this document is critical in determining the need and scope for the RI Phase II, this should have been a third objective of the DQSR. The DQSR provides a good description of the chemical and quality control data for the Phase I RI. The DQSR, however, is inadequate in assessing the useability of the data for characterizing the contamination at RI sites and conducting risk assessments. Therefore, the recommendations given in Section 6 can not be fully assessed. A complete review of the Phase II field work will be provided at the time the draft work plan is submitted.

2. Page 1, Section 1.0 INTRODUCTION

An acronym should be spelled out completely the first time it is used in a document. PARCC is used on page 1, however, it is not spelled out until page 3.

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3. Page 1, Section 1.0 INTRODUCTION

The introduction states that Phase I analytical results are included in the appendix of the report. The data tables provided to DTSC do not include a title page, identifying them as an appendix, nor a date of submittal.

4. Page 5, Section 2.1 Holding Times

Were any of the samples that exceeded their required holding times resampled?

5. Page 8, last paragraph, Section 2.4 Field and Laboratory Blanks

Professional judgement was used as the basis for qualifying sample results less than five times the CRQL as "U1." Is this professional latitude discussed in any guidance documents or in Treasure Island's QAPjP?

6. Page 9, Section 2.5 Accuracy

What does the acronym LCS stand for?

7. Page 10, Section 2.6 Precision - Field and Laboratory

Please reference the source of the criteria listed in this section.

8. Page 11, Section 2.6 Precision - Field and Laboratory

Field duplicates were not used as a measurement of individual sample precision. Therefore, the chemical data for the project were not qualified on the basis of field duplicate precision. Was this deviation from the EPA guidance included in the QAPjP?

9. Page 12, Section 2.7 Analytical/Matrix Performance

Please reference the source of the following statement:

"Internal standard area counts in the sample must be within a range of 50 to 200 percent, and the internal standard retention time must not vary by more than ± 30 seconds."

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10. Page 12, Section 2.7 Analytical/Matrix Performance
Please spell out ICPAA the first time it is used in this document.

11. Page 12, Section 2.8 Results Below the CRQL

The DQSR uses CRDL; however, the QAPjP lists Practical Quantitation Limit (PQL). The QAPjP must be updated for the Phase II RI.

12. Page 17, Section 4.1 Accuracy, last bullet item
Please elaborate on the other "QC" data which indicated that the methods provided data of good quality.

13. Page 18, Section 4.3 Completeness

Although the data exceeded the Treasure Island QAPjP completeness goal, the goal stated in the DQSR is incorrect. The QAPjP set a 95% goal for laboratory samples and 90% for field samples.

14. Page 18, Section 4.3 Completeness

Does this 99% completeness include the samples that did not meet the holding times and required resampling.

15. Page 20, Section 6.0 PHASE II RECOMMENDATIONS

"Other RI sites do not require additional work." This statement should be supported.

16. Page 20, Section 6.0 PHASE II RECOMMENDATIONS

The QAPjP should also be updated as part of the Phase II sampling and analysis plans.

17. Page 20, Section 6.1 Site 1 (Medical Clinic)

How was the background concentration of silver calculated for Treasure Island?

18. Page 20, Section 6.2 Site 6 (Fire Training School)

After completion of the Phase II field work the extent of soil contamination should be known. The proposed addition of three down gradient monitoring wells will not aid in defining the extent of soil contamination.

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19. Page 21, Section 6.3 Site 9 (Foundry)
How was the background concentration of lead calculated for
Treasure Island?

20. Page 21, Section 6.3 Site 9 (Foundry)

The groundwater at Site 9 should be resampled to confirm the
presence of Butylbenzylphthalate.

21. Page 21. Section 6.5 Site 11 (Yerba Buena Island Landfill)

The Phase II investigation should determine the source of
the diesel found in the landfill. The Navy should consider
sampling the below the beach at Site 11 to determine if
contamination has migrated offshore.

22. Page 22, Section 6.6 Site 17 (Tanks 103 and 104)

Installing only one well within the containment of Tank 104
will result in three wells in approximately a line (with 24-MW03
and 17-MW01). A groundwater monitoring well should also be
installed near 103 in order to sample the groundwater and
establish the groundwater gradient at the site.

Comments from the San Francisco Bay Regional Water Quality
Control Board

If you have any questions regarding these comments on the
DQSR, please call me at (510) 540-3809.

Sincerely,



Thomas P. Lanphar
Associate Hazardous Materials
Specialist
Site Mitigation Branch

cc: Ms. Gina Kathuria
San Francisco Bay
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