

**RESPONSE TO COMMENTS ON THE DRAFT FIELD SAMPLING PLAN (FSP) AND
QUALITY ASSURANCE PROJECT PLAN (QAPP), ADDITIONAL INVESTIGATION OF
ONSHORE INSTALLATION RESTORATION SITE 21, VESSEL WASTE OIL RECOVERY
AREA, DATED FEBRUARY 26, 2001
NAVAL STATION TREASURE ISLAND, SAN FRANCISCO**

This document presents the Navy's responses to comments from 1) the California Regional Water Quality Control Board (RWQCB), 2) the City of San Francisco (submitted by Geomatrix Consultants), and 3) Ms. Dale Smith RAB member, on the *Draft Field Sampling Plan (FSP) and Draft Quality Assurance Project Plan (QAPP), Additional Investigation of Onshore Installation Restoration Site 21, Vessel Waste Oil Recovery Area, Naval Station Treasure Island, San Francisco*, dated February 26, 2001, and prepared by Tetra Tech EM Inc. (TtEMI). The RWQCB comments were received on April 5, 2001 via electronic mail. The City of San Francisco comments were received on April 11, 2001 via electronic mail and the comments from Ms. Dale Smith were received on April 17, 2001 via electronic mail.

RESPONSES TO RWQCB COMMENTS

The following comments were received from the California Regional Water Quality Control Board (RWQCB) Associate Engineering Geologist, Ms. Sarah Raker, on April 5, 2001.

Specific Comments

1a. Comment: Identify data gaps from previous soil and groundwater investigations that are needed to further evaluate the extent of TPH around the former oil recovery system and VOCs in groundwater downgradient from the suspected source areas (the former dip tank). As stated in the Draft Final RI, the primary objective of the RI at Site 21 is to assess the nature and extent of petroleum hydrocarbon contamination around the oil recovery system and the chlorinated solvent contamination near the pipeline and Building 3. The draft FSP and QAPP should be updated to address these objectives by providing rationale for the additional data needed to fill the data gaps.

Response: The purpose of the proposed additional investigation at Site 21 is to complete a focused field effort to delineate volatile organic compound (VOC) contamination associated with the suspected source of the contamination (the former dip tank) and to delineate the extent of contamination. No data gaps have been identified for TPH. The FSP was developed and presents background information essential to the understanding of the proposed tasks. Contaminant concentration and monitored natural attenuation data will be collected in order to provide information for use in evaluating remedial alternatives.

- 1b. Comment:** The following additional items should be provided: Summarize the status of the pipeline investigation conducted at Site 21 since the RI was conducted in 1995. Include a description of the fuel pipeline removal and abandonment, results of soil and groundwater samples collected for the pipeline investigation, and rationale why no further investigation of TPH at Site 21 is needed.
- Response:** The purpose of this additional investigation is to focus on the VOC contamination. The pipeline investigation conducted under the petroleum program is summarized in the RI Report and the CAP pipeline work plan. All groundwater samples collected during the pipeline investigation within Site 21 contained less than the groundwater criteria of 1.4 milligrams per liter (mg/L) of total petroleum hydrocarbons, therefore, no further investigation of petroleum hydrocarbons is proposed at this time.
- 1c. Comment:** Describe the additional data that were obtained or reviewed since the RI was conducted that identified the former use of the dip tank near Building 3. Are historical drawings of Building 3 available to identify other possible sources of VOC inside Building 3, such as pipelines, sumps, or drainage basins?
- Response:** Since the draft RI Report was completed in 1997, basewide groundwater-monitoring program data collected in 1998 and 2000 have been reviewed. The RI hydropunch data, along with the groundwater monitoring data, were used to help focus the VOC investigation. Evaluation of Site 21 data indicates that VOCs detected in groundwater originate from (or near) the area of the former dip tank location. No other VOC sources were identified inside Building 3 from the review of historical drawings for Site 21 during the RI.
- 1d. Comment:** Update the soil and groundwater sample location map to include the known extent of VOCs in groundwater.
- Response:** The figure will be modified to include the current extent of VOC contamination.
- 1e. Comment:** The locations of the proposed upgradient monitoring wells may need to be adjusted after the extent of VOCs in soil has been delineated.
- Response:** Comment noted. Well locations provided on Figure 1 are proposed only and are subject to relocation based on field data and utility clearance issues.
- 1f. Comment:** Based on the distribution of tetrachloroethene (PCE), trichloroethene (TCE), and 1,2-dichloroethene (1,2-DCE) detected in the shallow and intermediate groundwater, the proposed monitoring well locations should be adjusted closer to the various VOC plumes. Let's discuss the rationale for the well locations before the next draft FSP is submitted.

- Response: Monitoring well locations are proposed so that the horizontal boundaries (non-detect) of the plume can be positively identified. However, the location of the monitoring wells has been adjusted to be within the suspected plume boundary based on RWQCB's written and verbal comments. A revised figure is attached.
- 1g. Comment:** **Based on the current site data, it is unclear why aquifer tests are being proposed. The need to conduct aquifer tests and the number and location of tests should be evaluated after the extent of VOCs in groundwater has been delineated.**
- Response: To complete groundwater natural attenuation modeling efforts, the collection of aquifer-testing data will be necessary. Wells to be used for aquifer testing will be selected after the first round of groundwater sampling is completed so that pumping tests will not impact areas of groundwater contamination. Additional text will be added to the FSP to outline the aquifer testing rationale.
- 2a. Comment:** **Provide additional figures to depict the site conceptual model to support the proposed additional investigation. The site conceptual model for Site 21 contained in the draft final RI is a generic flow chart showing various release mechanisms, pathways, exposure routes, and possible receptors. Please update the site-specific conceptual model on a figure to show the suspected sources of contaminants in the soil and groundwater and their possible migration to the bay.**
- Response: A site conceptual model is typically not included in a FSP. The model presented in the RI report (PRC 1997) is of sufficient detail for the purposes of this investigation. Additional text will be added to the FSP to further describe the suspected source of contamination and potential contaminant pathways.
- 2b. Comment:** **Additional figures should also include:**
Location of suspected or known buried utilities and the location of the former waste oil recovery area
- Response: A figure showing proposed well locations and buried utilities has been added as an appendix to the FSP.
- 2c. Comment:** **Additional figures should also include:**
Water level elevations and the direction of groundwater flow
- Response: Groundwater flow direction is presented in the text of the FSP. Detailed site maps showing water table elevations and contours provided in the RI Report are included in the appendix.
- 2d. Comment:** **Additional figures should also include:**
Cross section showing shallow and deeper water bearing units and the distribution of VOCs in groundwater (see Figure 14-10 of the draft final RI)
- Response: Figure 14-10 of the draft final RI report has been added as an appendix to the FSP.

2e. **Comment:** Additional figures should also include:

Location of fuel pipeline investigation samples and results of total petroleum hydrocarbons (TPH) analyses

Response: TPH is not the subject of this investigation. The pipeline investigation conducted under the petroleum program is summarized in the RI Report and the CAP pipeline work plan.

2f. **Comment:** Additional figures should also include:

Results of previous soil and groundwater samples to indicate the known extent of VOCs at the site (see Figures 14-6 through 14-9 of the draft final RI). "Dot" maps, similar to those prepared for the Corrective Action Plan (CAP) sites, can be used to show the extent of TPH and VOCs at various concentration ranges.

Response: Concentration maps of all VOC data (from the RI report) were reviewed during the evaluation and placement of proposed sampling locations. No "Dot" maps are currently available for the VOC data. The proposed fieldwork is focused on soil sampling locations near an assumed source area and defining the horizontal extent of VOC contamination in groundwater.

3. **Comment:** **The data quality objectives (DQOs) for this additional investigation are not consistent with the stated purpose of the investigation. The purpose of the additional investigation is 1) to locate and better define the suspected source of VOCs near the former dip tank and 2) to evaluate the magnitude and extent of volatile organic compounds (VOCs) in groundwater. The assessment of whether these contaminants pose risk to ecological or human receptors or whether a removal action is needed at Site 21 will be made after this additional investigation is completed. Please refer to the DQOs presented in the FSP and QAPP for the additional investigation proposed at Site 24 for an example.**

Response: The text of the FSP will be revised to better address the purpose of the additional investigation. The revised text includes the following: 1) conduct additional field investigation at Site 21 to locate and better define the suspected source of VOCs in the area of the former dip tank, 2) evaluate the magnitude and extent of VOCs in groundwater, and 3) evaluate the occurrence of natural attenuation.

The Navy agrees that the assessment of whether these contaminants pose risk to human receptors or whether a removal action is needed at Site 21 will be made after this investigation is complete. However, the Navy believes that these points are important to help establish sampling locations and protocol and should remain in the DQO text.

RESPONSES TO GEOMATRIX CONSULTANTS COMMENTS

The following comments were received from Peggy Peischel of Geomatrix Consultants on April 11, 2001. Geomatrix Consultants for the City of San Francisco submitted the comments.

General Comment

Comment: The redevelopment plans and schedule for Site 21 should be compared with the likely investigation and remediation activities and timeframe to identify potential conflicts. The City would like to meet with the Navy to discuss the duration of the planned investigations and remediation within context of the City's redevelopment plans.

Response: The current schedule calls for the initial round of fieldwork at Site 21 to be performed during the summer of 2001 (completed by September). Subsequent quarterly sampling rounds would be completed by May 2002. The RI Report is currently scheduled for completion in June 2002.

Comments on the Draft Field Sampling Plan (FSP)

1. **Comment:** Section 2.0: Stated objectives do not match those presented in the draft QAPP.

Response: The text has been modified so that the stated objectives match in both documents.

2. **Comment:** Section 4.1: Since groundwater may be present at about 6 feet below ground surface (bgs), the FSP should clarify that the proposed 4-6 foot depth and 6-8 foot depth samples will be adjusted upwards so both are collected above the water table. We suggest that the six initial boring locations be shown on Figure 1, along with an indication of potential subsequent step-out locations. Other investigative methods, such as a soil gas investigation, may also be a cost-effective alternative to the collection of soil samples.

Response: Comment noted. As stated in the text (Section 4.1) all soil samples will be collected above the water table. The text has been clarified to state that sample intervals will be adjusted as necessary to ensure that samples are collected above the water table.

Although soil gas investigations are a cost-effective alternative to soil sampling, the proposed soil samples are targeted in a well-defined area suspected of being the source of VOC contamination.

3. **Comment:** Sections 4.1.1: The draft FSP references a soil sampling standard operation procedure (SOP No. 005, included in Appendix A). This SOP does not include or reference procedures for the EnCore sampler. The SOP should be updated—it specifies that VOA vials should be filled directly from the split-spoon sampler or tube sampler in the field.

Response: Directions for the collection of soil samples using the EnCore sampler will be added to the FSP in order to update the existing standard operating procedure (SOP). Complete EnCore sampling directions will be included in Appendix A.

4. **Comment:** Section 4.2: The purpose of some of the proposed wells is unclear. Specific rationale for the placement of each proposed well should be added to the FSP.

Response: A table will be added to the FSP that details the placement and rationale for each proposed well. A copy of the table has been attached to this document.

5. **Comment:** Section 4.2.1: One intermediate-depth well is proposed within area of the former dip tank, a suspected source area for VOC contamination. An option to install surface conductor casing through the shallow groundwater zone, depending on field observations during drilling, should be considered for the FSP.

Response: The intermediate-depth well proposed immediately downgradient of the former dip tank area will be installed within the same water-bearing zone as the adjacent shallow well and will not penetrate any confining units. The well will be installed through a large bore Geoprobe drive pipe that effectively seals off all potential contamination from potentially contaminated shallow zones above the proposed screened interval. As the well is constructed within the drive pipe, a bentonite seal will be installed above the filter pack of the screened interval.

6. **Comment:** Section 4.2.3: Numerous groundwater-monitoring wells are present in this area of Treasure Island. Therefore, the “11 existing monitoring wells” referenced in the third paragraph of this section should be specifically listed for clarification.

Response: The text has been modified to state that 11 of the 12 existing monitoring wells (well 21MW-07A2 not included) will be sampled. All 12 of the existing wells are presented in Figure 1.

7. **Comment:** Section 4.3: The FSP should identify which two wells will have pumping tests and which nine wells will have slug tests. An apparent inconsistency should be resolved—this section specifies that slug tests will be performed on nine wells, instead of the seven wells referenced in Section 4.3.2.

Response: Slug tests will be completed on nine wells and pumping tests will be completed on two additional wells for a total of eleven aquifer tests. Wells to be tested by pumping will be chosen based on discharge rates noted during groundwater sampling activities. Additionally, areas of obvious groundwater contamination noted during sampling will be avoided.

8. **Comment:** Sections 4.3.1 and 4.3.2: The selected observation wells should also be identified.

Response: See response to comment 7. Pumping wells and observation wells will be identified at the completion of groundwater sampling activities.

9. **Comment:** Section 4.3.2: Reliable information from a slug test is greatly dependent on well construction and test procedures. Has each well been evaluated to determine whether the construction is suitable for a slug test? For instance, meaningful slug test results are dependent on low borehole storage capacity and the well screen being submerged below the groundwater level. How many cycles of slug placement, removal and recovery will be performed? Typically three cycles are performed on each well to reduce variability in results.

We strongly recommend that transducers be used on all wells, especially on the faster recharging wells. Using a well probe and stopwatch for fast recovery wells is likely to result in missed data during the early part of recovery.

Response: Existing wells have been evaluated for aquifer testing. Slug test and pumping test results from the existing wells at Site 21 will provide sufficient data for use in evaluating the hydrogeologic environment at the site. The number of times a slug test will be repeated per monitoring well will depend upon the recovery time of the tested well and the assessment of the data as it is obtained during the test.

Transducers and a data logger will be used to collect data during the pumping tests. However, the slug test data will be recorded with a well probe and stopwatch. The Navy agrees that early time data are difficult to collect in small-diameter wells. A transducer cable installed in a 2.0-inch diameter well with a 1.5-inch diameter slug typically moves upward when the slug is removed providing a loss of early time data. However, early time data usually represents drainage from the borehole and is typically ignored during data evaluation.

10. **Comment:** Section 5.0: Table 5-1 is missing from the draft FSP

Response: Table 5-1 was inadvertently omitted from some of the draft FSP copies. Table 5-1 is attached. A copy of the table has been attached to this document.

11. **Comment:** Section 5.6: Consistent with the draft QAPP, the source water blank should be analyzed for the same parameters as the soil samples and the groundwater samples, not just for VOCs.

Response: Source water blanks will be analyzed for contaminants (VOCs) and for monitored natural attenuation (MNA) parameters. The text and Table 5-1 will be modified.

12. **Comment:** Table 4-2: An apparent inconsistency should be resolved—the hold time for nitrate/nitrite is shown as 14 days in Table 4-2 and as 48 hours in Table 4-3.

Response: The hold time for preserved nitrate/nitrite is 14 days and for unpreserved nitrate/nitrite is 48 hours. Both hold times (preserved and unpreserved) will be added to both tables to clarify the existing inconsistency.

13. **Comment:** Table 4-2: It would be helpful if the major anions were listed, perhaps in a footnote to the table.

Response: Comment noted. The major anions will be listed as a footnote to Table 4-2.

Comments on the Draft Quality Assurance Project Plan (QAPP)

1. **Comment:** Section A1.4.2 and Table A-2: The decision point for groundwater appears to be based solely on the evaluation of data from existing wells to determine whether or not “sampling at additional locations is necessary”. This is inconsistent with the draft FSP, which begins with the installation of new groundwater monitoring wells. The draft FSP appears to already assume that existing monitoring well data are inadequate and then proposes additional sampling locations.

Response: The QAPP text in Section A1.4.2 and Table A-2 refers to all wells (existing and proposed) as if they are already present. Therefore, the decision point is based on the evaluation to be performed after the installation and sampling of the new wells. The text will be modified to clarify this point.

2. **Comment:** Section A1.4.5 and Table A-2: Generally, the same comment as for Section A1.4.2 above. An alternative action resulting from the groundwater contamination “if . . . then” statement already appears to have been selected and presented in the draft FSP

Response: Please see response to comment 1.

3. **Comment:** Section A1.4.5: The natural attenuation decision rule relies on VOC concentrations “decreasing through time at a favorable rate”. The expected or acceptable time period and rate of decrease, or other appropriate measure of effectiveness, should be included in the decision rule.

Response: At this time, acceptable natural VOC degradation rates have not been established. Following completion of the additional investigation, review of data, and evaluation of the hydrogeologic conditions to conclude if conditions are favorable for MNA, the Navy (in conjunction with other Base Closure Team members) will make a decision regarding the acceptability of the reported natural VOC degradation rates.

RESPONSES TO MS. DALE SMITH (RAB MEMBER) COMMENTS

The following comments were received via electronic mail from Paul Rosenfeld on April 17, 2001. The comments were submitted by RAB member Ms. Dale Smith.

1. **Comment:** **The rationale for utilizing natural attenuation as the preferred remediation procedure does not appear to have been discussed in this document. Why was it chosen?**

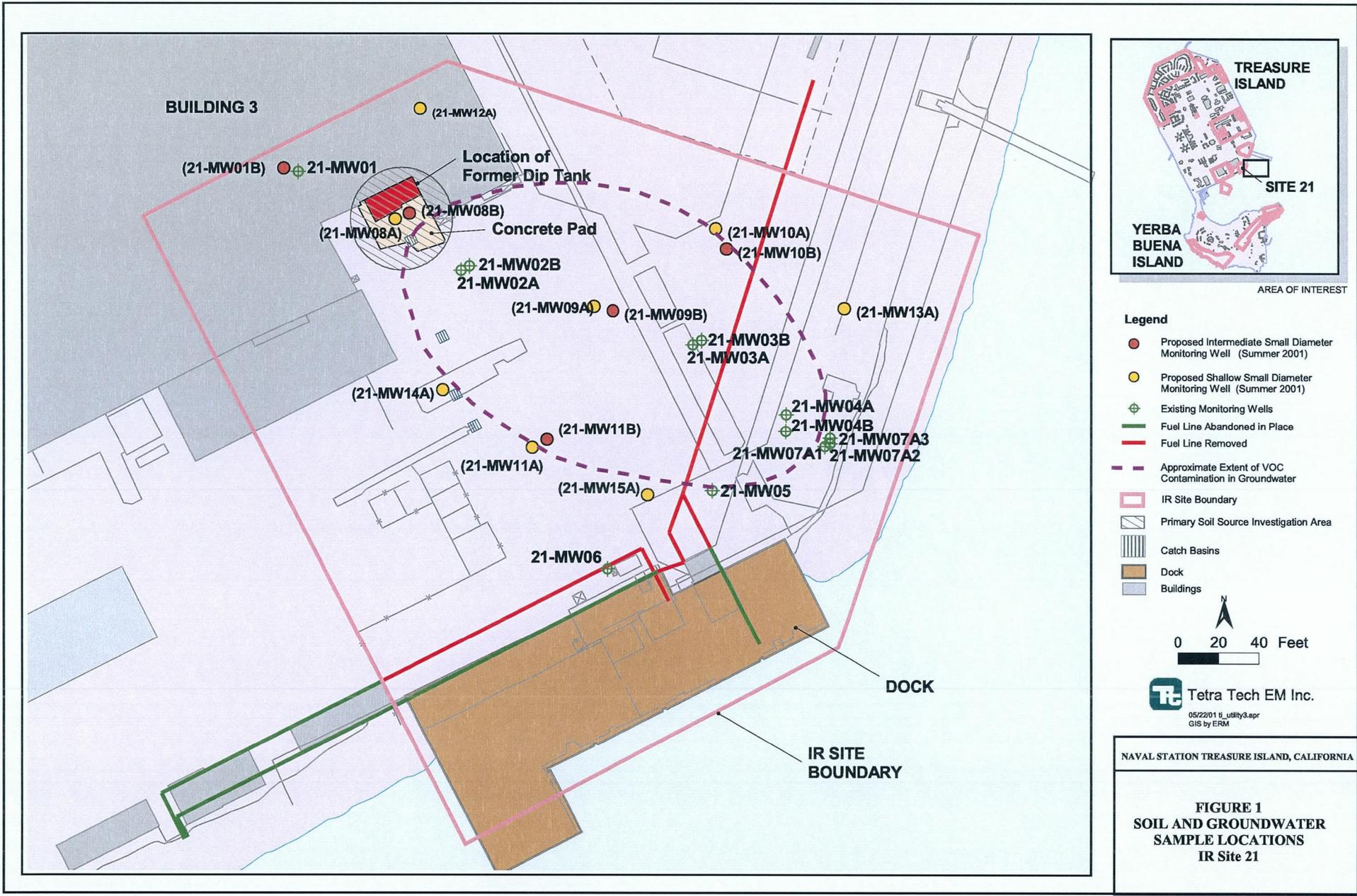
Response: At this time, natural attenuation has not been chosen as the preferred remediation procedure at Site 21. Review of groundwater data collected during previous sampling events at Site 21 indicates that natural attenuation may be occurring. The investigation proposed in the FSP calls for collecting additional natural attenuation data that will verify if natural attenuation is a viable site closure alternative.

2. **Comment:** **Was there not a COC plume cross-section map developed for this area in the past? Has it been updated and why was it not included?**

Response: A contaminant of concern (COC) plume cross-section map was developed for the RI report. VOC concentration maps were updated in the 1999 groundwater status report (TtEMI 1999). The figures will be added as an appendix to the FSP.

REFERENCES

- PRC. 1997. "Draft Final Onshore RI Report, NAVSTA TI, California." Prepared for the Department of the Navy, Western Division. Naval Facilities Engineering Command, San Bruno, California. September.
- Tetra Tech EM Inc (TtEMI). 1999. "Groundwater Status Report, Summary of Groundwater Monitoring from January to November 1998, Naval Station Treasure Island, San Francisco, California." May 7.



ATTACHMENTS

TABLE 4-3

**PROPOSED GROUNDWATER MONITORING WELL LOCATIONS AND RATIONALE
IR SITE 21 NAVAL STATION TREASURE ISLAND**

Proposed Groundwater Monitoring Well ID	Approximate Well Depth (feet bgs)	Screened Interval (feet bgs)	Aquifer Zone Monitored	Location	Rationale
21-MW01B	28	23-28	Intermediate	Upgradient of suspected source area; paired with existing shallow zone monitoring well 21-MW01	Provide contaminant plume delineation data, background RNA data, and vertical hydraulic gradient data.
21-MW08A	10	5 – 10	Shallow	In suspected source area; paired with 21-MW08B.	Provide RNA process data in the source area and provide vertical hydraulic gradient data.
21-MW08B	28	23 – 28	Intermediate	In suspected source area; paired with 21-MW08A.	Provide RNA process data in the source area and provide vertical hydraulic gradient data.
21-MW09A	10	5 – 10	Shallow	Along approximate flow path of dissolved contaminant plume and downgradient of suspected source; paired with 21-MW09B.	Provide contaminant plume degradation along flow path, RNA process data along flow path, and vertical hydraulic gradient data.
21-MW09B	28	23 – 28	Intermediate	Along approximate flow path of dissolved contaminant plume and downgradient of suspected source; paired with 21-MW09A.	Provide contaminant plume degradation along flow path, RNA process data along flow path, and vertical hydraulic gradient data.
21-MW10A	10	5 – 10	Shallow	Lateral to expected shallow zone plume; paired with 21-MW10B.	Provide contaminant plume delineation data and vertical hydraulic gradient data.
21-MW10B	28	23 – 28	Intermediate	Lateral to expected shallow zone plume; paired with 21-MW10A.	Provide contaminant plume delineation data and vertical hydraulic gradient data.
21-MW11A	10	5 – 10	Shallow	Lateral to expected plume; paired with 21-MW11B.	Provide contaminant plume delineation data and vertical hydraulic gradient data.
21-MW11B	28	23 – 28	Intermediate	Lateral to expected plume; paired with 21-MW11A.	Provide contaminant plume delineation data and vertical hydraulic gradient data.
21-MW12A	10	5 – 10	Shallow	Upgradient of suspected source area.	Provide contaminant plume delineation data and background RNA process data.
21-MW13A	10	5 – 10	Shallow	Lateral and downgradient to expected plume.	Provide contaminant plume delineation data and RNA process data.

**TABLE 4-3
(Continued)**

**PROPOSED GROUNDWATER MONITORING WELL LOCATIONS AND RATIONALE
IR SITE 21 NAVAL STATION TREASURE ISLAND**

Proposed Groundwater Monitoring Well ID	Approximate Well Depth (feet bgs)	Screened Interval (feet bgs)	Aquifer Zone Monitored	Location	Rationale
21-MW14A	10	5 – 10	Shallow	Lateral to expected plume.	Provide contaminant plume delineation data and RNA process data.
21-MW15A	10	5 – 10	Shallow	Lateral and downgradient to expected plume.	Provide contaminant plume delineation data and RNA process data.

TABLE 5-1

SUMMARY OF PROPOSED DATA COLLECTION
IR SITE 21 NAVAL STATION TREASURE ISLAND

Sample Type	Analytical Parameters	Number of Field Samples	Equipment Rinsates	MS/MSD	Field Duplicates	Groundwater Trip Blanks	Source Water Blanks	Total Samples
Soil	VOCs	40	5	2	NA	NA	NA	47
	TOC	5	NA	NA	NA	NA	NA	5
	Physical Parameters ¹	5	NA	NA	NA	NA	NA	5
Groundwater	VOCs	96	NA	5	10	5	1	117
	Natural Attenuation Parameters ²	96	NA	NA	10	5	1	112
IDW - Soil	VOCs	3	NA	NA	NA	NA	NA	3
	SVOCs	3	NA	NA	NA	NA	NA	3
	Metals	3	NA	NA	NA	NA	NA	3
	TPH-E	3	NA	NA	NA	NA	NA	3
	TPH-P	3	NA	NA	NA	NA	NA	3
IDW - Water	VOCs	3	NA	NA	NA	NA	NA	3
	SVOCs	3	NA	NA	NA	NA	NA	3
	Metals	3	NA	NA	NA	NA	NA	3
	TPH-E	3	NA	NA	NA	NA	NA	3
	TPH-P	3	NA	NA	NA	NA	NA	3

Notes: MS/MSD Matrix spike/matrix spike duplicate
VOCs Volatile organic compounds
TOC Total organic carbon
NA Not applicable
SVOCs Semi volatile organic compounds
TPH-E Total extractable petroleum hydrocarbons
TPH-P Total purgeable hydrocarbons

1 Physical parameter analyses will include density, particle size analysis, total organic carbon, and porosity
2 Laboratory analysis for natural attenuation parameters includes methane, ethane, ethene, alkalinity, TOC, nitrate/nitrite, sulfate, and chloride.



TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N62474-94-D-7609

Document Control No. DS . 0200 . 17173

TO: Mr. Richard Selby, Code 02R1
Contracting Officer
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San Diego, CA 92132-5190

DATE: 06/12/01
CTO: 200
LOCATION: NAVSTA Treasure Island, San Francisco

FROM: Daniel Chow, Program Manager

DOCUMENT TITLE AND DATE:

Response to Comments on the Draft Field Sampling Plan and Draft Quality Assurance Project
Plan, June 12, 2001

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Tetra Tech EM Inc.

6th & Last Chance Gulch, Suite 612 ♦ Helena, MT 59601 ♦ (406) 442-5588 ♦ FAX (406) 442-7182

June 12, 2001

Mr. Scott Anderson
Remedial Project Manager
Southwest Division
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1230 Columbia Street, Suite 1100
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**Subject: Submittal of Response to Comments on the Draft Field Sampling Plan and Draft
Quality Assurance Project Plan, Additional Investigation of Onshore Installation
Restoration Site 21, Vessel Waste Oil Recovery Area, Naval Station Treasure Island,
California
CLEAN II Contract No. N62474-94-D-7609, Contract Task Order 200**

Dear Mr. Anderson:

Enclosed please find four copies of the Response to Comments on the Draft Field Sampling Plan and Draft Quality Assurance Project Plan, Additional Investigation of Onshore Installation Restoration Site 21, Vessel Waste Oil Recovery Area, Naval Station Treasure Island, California. Please distribute one copy to Mr. Michael Bloom and one copy to Mr. Jim Sullivan. As you requested, copies of the report have been sent under separate cover to the BCT members.

If you have any questions, please call me at (406) 442-5588.

Sincerely,

David Donohue
Project Manager

Enclosures

cc: Sarah Raker, Regional Water Quality Control Board
 David Rist, Department of Toxic Substance and Control
 Phillip Ramsey, United States Environmental Protection Agency, Region IX
 Gary Foote, Geomatrix
 Martha Walters, City of San Francisco
 John Baur, IT Corporation
 Nathan Brennan, RAB Co-Chair
 Patricia Nelson, RAB Technical Chair
 Dale Smith, RAB Member
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