

ARC ECOLOGY

ARMS CONTROL RESEARCH CENTER

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May 15, 1995

Mr. Hugo Berston
Naval Station Treasure Island
410 Palm Avenue
San Francisco, CA 94130-0410

Dear Mr. Berston,

I have enclosed a copy of a letter from the NAVSTA TI RAB ad hoc technical subcommittee to Mr. James B. Sullivan. As Mr. Sullivan is currently in Chicago, we would greatly appreciate it if you could fax this letter to him so that he will receive it well in advance of our next RAB meeting. The original has been sent to Mr. Sullivan.

Thank you for your attention to this matter.

Sincerely,



Donald Meyers

for NAVSTA TI RAB Ad Hoc Technical Subcommittee

Encl. 1

Admin Record (3 copies)

May 15, 1995

Mr. James B. Sullivan
BRAC Environmental Coordinator
Naval Station Treasure Island
410 Palm Avenue, Code 00E
San Francisco, CA 94130

Dear Mr. Sullivan,

We are writing to document, clarify and hopefully resolve our continued concerns regarding the validity of the methodology proposed for the Phase II B Remedial Investigation (RI) at Naval Station Treasure Island (NSTI). Our concerns center around the use of an unproven combination of techniques (Hydropunch, Geoprobe and ELISA) for the collection of data which will form the basis for remedial actions. As the BCT and the Navy's consultant (PRC Environmental Management Inc.) have not been able to provide evidence demonstrating the performance of the proposed methodology against a proven methodology, we are not convinced that use of the former is appropriate. Specifically, we feel that the proposed methodology

- may have greater propensity for cross contamination of samples
- may not provide the quality of soil and ground water samples necessary for developing successful remediation strategies
- may not provide adequate definition of the nature and extent of contaminants due to the high detection limits of the ELISA kits

We feel that these are valid issues that need to be resolved prior to commencement of the Phase II B field work.

We have previously documented our recommendations for resolving our concerns. To summarize, our concerns would be alleviated if the proposed methodology was tested at a complex site on NSTI against proven field methods and shown to be as good as or superior to those methods. One subcommittee member provided a written description of proven field methods considered suitable for such a comparative study (hollow stem auger/split spoon sampling and laboratory analysis) to PRC at the request of a BCT member.

After two meetings with the Navy, the BCT and PRC and two RAB meetings, the subcommittee felt that the Navy had agreed to perform the comparative study, albeit at site 14/22 rather than site 06 as recommended. Following the April 25 RAB meeting, however, it appeared that the Navy and PRC had moved away from this position and intend only to increase the percentage of samples from site 14/22 that will be sent for confirmatory laboratory analysis. This change implies that the subcommittee's only concern with the RI was the validity of the ELISA technique, which as stated above is not the case. In addition, our recommendation to conduct the comparative study prior to commencing the RI field work has not been taken.

To resolve this issue, the subcommittee requests that the Navy prepare a written response for the administrative record stating whether or not they will conduct the comparison study as recommended. If the Navy does not feel that the comparative study needs to be done or should be amended, the subcommittee requests that the Navy state its rationale for any changes to the recommendations.

The subcommittee will support the use of the proposed methodology enthusiastically once it has been validated against conventional methods and shown to be applicable to the proposed use. We feel that this comparison test could have far reaching effects on environmental investigations at bases nation wide, as it may validate a new and cost-saving method of investigation. By not validating the proposed methodology up front, however, there is great potential for wasting time and money by producing data that at some point in the future may prove to be an inadequate basis for developing successful remedial actions.

Sincerely,

Restoration Advisory Board
Ad Hoc Technical Subcommittee
Naval Station Treasure Island

Members

Jim Aldrich
Paul Hehn
Donald Meyers
Pat Nelson
Dale Smith
Brad Wong

cc:

Hugo Berston, NAVSTA TI