



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

N60028\_000708  
TREASURE ISLAND  
SSIC NO. 5090.3.A

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

May 29, 1997

Ernesto M. Galang  
EFA West - Code 1832.5EG  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, California 94066-2402

Re: Draft Additional Characterization Workplan for Site 24 for  
Naval Station Treasure Island dated May 16, 1997

Dear Mr. Galang,

The U. S. Environmental Protection Agency (EPA) has received and reviewed the subject document. EPA's comments are enclosed.

If you have any questions, please call me at (415) 744-2383.

Sincerely,

*Rachel D. Simons*

Rachel D. Simons  
Remedial Project Manager  
Federal Facilities Cleanup Office

Enclosures

cc: Jim Sullivan, NAVSTA TI  
Mary Rose Cassa, DTSC  
Gina Kathuria, CRWQCB  
Martha Walters, SFRDA  
Richard Knapp, PRC  
File

*Pat Nelson*  
*Paul Hehr*  
*ARC Ecology*  
*John Allman*  
*Usha Vedagiri*  
*Admin. Record File (3 copies)*

} *RAB*

**Draft Additional Characterization Workplan  
for Site 24 for Naval Station Treasure Island  
dated May 16, 1997**

**Specific Comments:**

**1. Section 3.0 Additional Characterization of Site 24, page 2**

Please provide more information on how the sampling locations were selected.

- a) EPA understands that the geoprobe samples collected beneath building 99 will target old trench drains. This information should be included in the workplan. Also, have the floor plans for building 99 been reviewed for potential source areas?
- b) It appears that the three geoprobe samples near the shoreline were located to define the downgradient edge of the plume. If this is the case, it should be explained.
- c) It appears that the geoprobe sample on the south side of building 99 was located to define the upgradient edge of the plume. If this is the case, it should be explained.
- d) Why are additional cluster wells proposed within the plume near hydropunch 24HP07 ?

**2. Section 3.8 Monitoring Well Purgings, Sampling, and Analysis, page 5**

It seems that using a bailer to sample groundwater for VOCs would not be very efficient since VOC loss due to aeration of the groundwater could be significant. Please address.