

MEMORANDUM

To: Ernesto Galang, EFA-WEST      Date: May 23, 1997  
Jim Sullivan, NSTIBRAC      Subject: Comments on the Naval  
Fr: Patricia Nelson, NSTIRAB (PN)      Station Treasure Island  
Technical Subcommittee      (NSTI) Remedial  
Investigation (RI)  
Report Addenda No. 2

This memo transmits the comments on the technical adequacy of the NSTI RI Report as prepared by Pat Nelson, Co-Chair of the Community NSTIRAB. The comments are summarized in two parts: general comments and specific comments.

I. General Comments

A. Overview

It is understood, from the RI Addenda No. 2 report, that the objectives of the work summarized therein were to further characterize the Installation Restoration (IR) site nos. 12 and 17 located on Treasure Island (TI) and delineate the extent of localized contamination that was not completely defined in the Phase IIB RI field investigation.

B. Community Restoration Advisory Board Member Expectations

The Navy needs to understand that the Community Restoration Advisory Board (RAB) had expectations of the RI Addenda No. 2 report to not only achieve the objectives identified above, in a clear fashion, but also to address those comments on the technical work that were developed and transmitted in January 1997 upon our review of the NSTI RI sections addressing IR site nos. 12 and 17. Examples of those comments, include the use of employing the immunoassay kit chemical analyses for IR site no. 12, among other IR sites, and addressing the characteristics of IR site no. 17 independently of adjoining IR site nos. 5, 24, 4 and 19. The immunoassay kits were again employed for the supplemental analyses and the analyses for IR site no. 17 were addressed independently of adjoining IR sites.

C. Comments on the NSTI RI Addenda No. 2 Report

This subsection summarizes inadequacies in the RI Addenda No. 2 report for which examples or explanations are provided in Section II.

1. The objective of delineating the extent of localized contamination that was not completely defined in the Phase IIB RI field investigation was not met for IR site no. 12.

Specifically, there were other areas than that surrounding monitoring well no. 12-MW16 where contamination was observed in the Phase II B RI field investigation that was not addressed in the supplemental work summarized in RI Addenda No. 2. Although the community RAB understands that there will be a more comprehensive work plan addressing further investigation of IR site No. 12 prepared and implemented in summer of 1997, the purpose of the supplemental work summarized on page no. 1 should be modified to define more clearly the meaning of the term "localized contamination".

2. It is unclear whether the objective of delineating the extent of localized contamination that was not completely defined in the Phase IIB RI field investigation was met for IR site no. 17.

Although additional data were obtained for the purposes of preparing the Addenda No. 2 document, there is an "outlier" concentration of .2 ug/l of TCE at sampling point no. 17HP11 which is not enveloped in the contour and may suggest that the volatile organic compounds (VOC) plume should be further investigated in the north-northwest portion of IR site no. 17. Also, the relationship between contaminant plumes emanating from IR site nos. 5 and 17 and the downgradient IR site no. 24 as depicted by contour in Figure No. 6 is unclear. In addition, the contour suggests, the predominant direction of gradient appears to be northerly rather than the defined groundwater flow direction on the figure, a northeasterly direction.

## II. Specific Comments

### A. Site Assessment Methodology

1. Reference is made in text to utilizing the Phase I RI field sampling plan on page nos. 2 and 6 for which a copy has not been provided the community RAB. Please describe what methods were used and explain why this was used rather than that prepared as part of the Phase IIB RI.

2. Please identify the type and manufacturer of immunoassay kits were used in the field since they were not described in text.

3. A description of the potential sources of contaminants for IR site no. 17 would have been helpful since the neighboring IR site

no. 24 has similar contaminants from its former use as a dry cleaning facility.

B. Vertical and Horizontal Extent of Contaminants

1. Reference is made in text to samples being taken off of the IR site no. 12, please define in text and in the appropriate figures those locations and results.
2. The depths of soil samples taken at IR site nos. 12 and 17 are not defined in text with the chemical concentrations of analytes. Description of both in text would be helpful since the discussion of the results is overly generalized and is not comprehensive to the point of defining the vertical and horizontal extent of contaminants.
3. It would have been helpful to summarize the data obtained in the supplemental field work concert with data obtained for either IR site for the Phase I and IIB work so that the site characteristics could be more comprehensively described.

C. Evaluation of Valid and Reproducible Chemical Analyses

1. Immunoassay field test kits were used for the IR site no. 12 work and of the 16 samples analyzed by this method 6 were analyzed by a traditional laboratory method. Please specify whether the immunoassay test results were confirmed by the traditional laboratory methods and the rate of false negatives or false positives, if any.
2. The majority of analytical data contained in the appendix is "qualified" in a manner that indicate there are quality assurance/quality control (QA/QC) problems with the results. This is not the first time in the RI process that there have been QA/QC issues with the analytical data. Please provide the community RAB Technical Subcommittee a copy of the case narratives so that we may determine whether the data is of any use for the RI analysis.

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