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GEOMATRIX

May 24, 1999
Project 4850.01

Mr. Ernesto M. Galang
Remedial Project Manager
Department of the Navy
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-5006

Subject: Review of *Addendum 1 to Technical Memorandum Sampling Plan (March 1999 Delineation Sampling) for the Removal Action of TPH Contaminated Soil at Site 12 (Building Unit 1311)*
Naval Station Treasure Island
San Francisco, California

Dear Mr. Galang:

This letter presents the results of a review of *Addendum 1 to Technical Memorandum Sampling Plan (March 1999 Delineation Sampling) for the Removal Action of TPH Contaminated Soil at Site 12 (Building Unit 1311)* (Addendum), prepared by IT Corporation (IT, dated May 14, 1999). This review was performed by Geomatrix Consultants, Inc. (Geomatrix), on behalf of the City and County of San Francisco, Mayor's Office, Treasure Island Project (the City). The need for and scope of additional characterization were first discussed in a technical meeting of the Remedial Project Managers/BRAC Cleanup Team (RPM/BCT) on April 5, 1999. Representatives from Tetra Tech EM Inc. (TtEMI) presented results of sampling conducted by IT in March 1999 indicating, in their opinion, that excavation of the affected soil was no longer a viable option, and additional sampling was required to better characterize the extent of affected soil prior to implementing an alternative, in situ, remedial option. These issues were further discussed during a technical meeting of the RPM/BCT on May 10, 1999.

Our comments are summarized below:

- The Addendum proposes collecting soil samples from multiple depths at each location, and initially analyzing a subset of these samples. The proposed sampling and analysis program is generally acceptable (except as noted below) as long as the initial analytical results are available in time to determine the need for contingent analyses. In addition, the Addendum should provide a framework within which the decision to perform contingent analyses will be made. It is our expectation that additional analyses will be required, especially for samples collected from locations with visible staining. Furthermore, regardless of the initial results for volatile and semivolatile organic compounds (VOCs and SVOCs), other samples may need to be analyzed for these

constituents if insufficient data are available from earlier sampling events to adequately assess potential health risks.

- Pavement should not necessarily be considered an obstruction to collecting samples (e.g., a location in the middle of the road could be moved to the side of the road to minimize traffic disruptions, but would not necessarily need to be moved a significant distance simply to avoid pavement).

- The Addendum states that characterization will continue until the outer-most sampling locations do not have visible staining unless "the extent is becoming unmanageably large." We do not agree that the potential size of the affected area should dictate when characterization is complete. Instead, characterization should be considered complete when there is sufficient information to formulate a technically defensible position regarding the next course of action.

- As agreed to during the May 10, 1999 meeting, the Addendum should identify the locations of the proposed ORC (oxygen-releasing compound) wells.

Please feel free to call the undersigned at (510) 663-4100 if you have any questions.

Sincerely yours,

GEOMATRIX CONSULTANTS, INC.

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