

**RESPONSE TO EPA COMMENTS ON  
DRAFT FIELD SAMPLING PLAN ADDENDUM  
FOR INVESTIGATION OF THE ELEMENTARY SCHOOL AREA  
SITE 12  
NAVAL STATION TREASURE ISLAND  
SAN FRANCISCO, CALIFORNIA**

This document presents the Navy's responses to comments from U.S. Environmental Protection Agency on the Draft Field Sampling Plan Addendum for Investigation of the Elementary School Area, Site 12, Naval Station Treasure Island, San Francisco, California. The comments addressed below were dated November 12, 1999.

**RESPONSES TO EPA COMMENTS**

**General Comments**

- 1. Comment:** Please clearly depict the school site boundaries relative to the field investigation. More specifically, please identify which of the proposed test pit locations shown in the AOC are, in fact, on the school site proper.

**Response:** The Navy will revise the figure to clearly show the school boundary.
  
- 2. Comment:** EPA believes that it is essential that the subject draft FSP indicate that the sampling event will occur on the weekend or during the holidays when the school will be closed.

**Response:** The Navy will add a statement to the Field Sampling Plan Addendum to indicate that all sampling within the Elementary School Investigation Area. Currently the FSP decision criteria indicates that "If any compounds are detected at concentrations exceeding the U.S. EPA preliminary remediation goals (PRGs), then further investigation under the Installation Restoration Program will be considered". If it is determined that further action will need to be taken based on exceedances of PRG's the Navy will propose additional sampling or action at that time. It is not possible to predict the location or level of contaminants at this time and propose a specific contingency plan will be conducted during a time when the school is closed.
  
- 3. Comment:** As noted in EPA's comments on the Mariner Drive FSP, an FSP must clearly specify the decision criteria that would initiate a "step out" plan and delineate the contingency protocol should hazardous substances be detected and require an action.

**Response:** Contingent sampling locations have been identified on Figure 1. A decision rule specifying when contingent locations will be excavated has been added to Step 5 of the Data Quality Objectives..

## Specific Comments

1. **Comment:** As we discussed in several BCT/Project meetings, the FSPs for the field efforts at Site 12 would be similar in sampling protocol and be informed by the DQO process. Accordingly, the comments that EPA submitted previously on the Mariner Drive FSP are equally applicable to the subject draft FSP. In brief, the import of those review comments was to ensure appropriate and adequate clarity of scope and objectives, sampling rationale and design, data analysis and interpretation, and quantitative criteria for limiting potential errors in our decision-making. Please refer to the Agency's comments on the draft Mariner Drive FSP.

**Response:** The EPA comments on the Mariner Drive FSP have been considered in preparation of the Final FSP Addendum for the Elementary School.

2. **Comment:** The preliminary and non-validated sampling results received this week from the Navy for the former storage yard indicated elevated levels of PCBs (Aroclor 1260) both at depth and at the surface (See page 7, sampling location KC-8). In addition, the sampling results revealed elevated levels of benzo(a)pyrene at sample location KC-6. EPA notes that the Navy is re-analyzing the two sample locations for PCB. EPA recommends that the Navy also re-analyze the sample location with the elevated benzo(a)pyrene concentrations.

**Response:** The analytical results for KC-6 appear to be valid. Reanalysis is not expected to provide a different result.

3. **Comment:** Based on the preliminary sampling results and the fact that the field investigation is being performed at an "active" elementary school site, EPA strongly recommends that the Navy, on an a priori decision-basis, sample for the full suite of analyses (i.e., VOCs, SVOCs, pesticides and PCBs) at all sample locations for the school site. EPA believes that the sampling design and decision rules should be modified to indicate that the decision of whether or not to test for VOCs, SVOCs, pesticides or PCBs will not be limited solely to the presence or absence of "odor, staining, debris, [or] elevated PID readings...[or] exceedances of the residential PRGs. It the opinion of EPA's technical support staff, that relying exclusively on the field screening tools identified in the subject draft FSP may not provide consistent nor reliable indications of all potential chemicals that may be present at the site. In sum, to optimally evaluate whether hazardous substances are present at the school site, the Navy should sample for the full suite of analytes.

**Response:** The objectives and sampling methods for the investigation of chemical contamination in the Former Storage Yard and the investigation for debris in the Elementary School are significantly different., As noted in the comment, relying upon field screening tools will

not provide reliable indications of all chemicals. Therefore, the Navy will continue the investigation for spills or releases from the Former Storage Yard area using a program of soil borings and sampling at defined intervals. This method does not rely upon screening methods to identify contamination. The objective of the test pit investigation will be limited to the identification of debris in the subsurface. Therefore, sampling within the western portion of the Elementary School will require the use of both test pit and soil boring sampling methods. Soil borings will be extended outside the Former Storage Yard area to fully define chemical contamination in soil that is not related to debris.