



N60028_001847
TREASURE ISLAND
SSIC NO. 5090.3.A

August 5, 2008

Project 4850.005.3

Mr. James B. Sullivan
Mr. James Whitcomb
Mr. Charles Perry
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Re: Comments on July 2, 2008 Draft Groundwater Status Report:
Summary of Groundwater Monitoring at Site 12 August and November 2007
Naval Station Treasure Island
San Francisco, California

Dear Mr. Sullivan, Mr. Whitcomb and Mr. Perry:

On behalf of the Treasure Island Development Authority (TIDA), AMEC Geomatrix, Inc. (AMEC) has reviewed the July 2, 2008 Draft Groundwater Status Report: Summary of Groundwater Monitoring at Site 12 August and November 2007 (Draft Site 12 Groundwater Status Report). Our comments are presented below.

GENERAL COMMENTS

- **Water Level Measurements in Northern Part of Site (Section 3.1 Groundwater Level Measurements & Section 5.3 Site 12—Hydrogeology).** Mention is made regarding the lack of access to wells 12-MW08, and 12-MW28 through 12-MW30; however, no mention is made of the lack of groundwater level measurements in northern area wells; including six wells during the August monitoring event (12-MW01, 12-MW11, 12-MW13, 12-MW17, 12-MW18, and 12-MW19) and three wells during the November monitoring event (12-MW01, 12-MW13, and 12-MW18). Please explain the reason water levels were not measured in these wells.
- **Presentation of Data (Section 5.4 Site 12—Analytical Results for Groundwater).** Each subsection of this section present data; however, some sections present all data (e.g., copper results for Solid Waste Disposal Areas A and B) while others present only data exceeding a screening criterion. It would be helpful if the data were presented consistently.
- **Historical Data.** It would be helpful to have tabulated historical analytical data presented in an appendix to allow an assessment of data trends for compounds other than arsenic and total petroleum hydrocarbons.

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- **Impact of Non-Time Critical Removal Action in Solid Waste Disposal Area A and B.** Please discuss long term impact, if any of non-time critical removal action (NTCRA) on ongoing monitoring activities. Do any of the wells require abandonment/replacement as a result of removal actions? Please indicate either the status of the NTCRA during the relevant monitoring period or the current status. Please update Figure 1-2 indicating the extent of excavation activities being performed during the NTCRA.

SPECIFIC COMMENTS

- **Section 3.2.3 Sampling Methods.** The second paragraph states that a portable bladder pump was used to collect groundwater samples from monitoring well 12-MW33; however, no other mention is made of well 12-MW33 and the well is listed as inactive on Figure 1-2. Please clarify the status of 12-MW33.
- **Figure 5-1.** Figure 5-1 does not indicate the location of site utilities.
- **Section 5.1.1 Solid Waste Disposal Areas.** Please clarify if reference to 3,000 samples refers to the solid waste disposal areas within Site 12 or to the total number of samples collected across the site.
- **Section 5.4.1 Solid Waste Disposal Areas A and B.** The text suggests that monitoring well 12-MW31 was not sampled in August due to the ongoing NTCRA; however, monitoring well 12-MW31 is not routinely sampled during the semi-annual event.
- **Section 5.4.2 Solid Waste Disposal Area 1207/1209.** It would be helpful if the elevated copper concentration measured in the groundwater sample collected from 12-MW17 in November was put in context with respect to historical copper concentrations measured in the well. This could be accomplished by either a discussion in the text or by a graphical presentation of the copper data. The change from November 2006 (23 µg/l) is significant and warrants additional analysis. In addition, please make note that the arsenic concentration of 57 µg/l measured in monitoring well 12-MW17 in November was the highest concentration measured in that well to date.



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We appreciate the opportunity to review the Draft Site 12 Groundwater Status Report. Feel free to contact either of us if you have any questions.

Sincerely yours,
AMEC Geomatrix, Inc.

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Senior Geologist

Gary R. Foote, PG #5044
Principal Geologist

DCD/GRF/jrh

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cc: Mr. Jack Sylvan, TIDA
Ms. Mirian Saez, TIDA
Mr. Michael Tymoff, TIDA
Mr. Marc McDonald, TIDA
Mr. Ryan Miya, Cal EPA Department of Toxic Substances Control
Ms. Christine Katin, U.S. Environmental Protection Agency
Mr. Paisha Jorgensen, Cal EPA Regional Water Quality Control Board