

**From:** [Silva, Diane C CIV NAVFAC SW](mailto:Silva_Diane_C_CIV_NAVFAC_SW)  
**To:** [Silva, Diane C CIV NAVFAC SW](mailto:Silva_Diane_C_CIV_NAVFAC_SW)  
**Subject:** FW: TIDA Comments - FW: Report Comments: TI Sites 6 and 12 - 2011 Groundwater Monitoring Report  
**Date:** Monday, June 18, 2012 13:38:17

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-----Original Message-----

From: Warner, Scott [<mailto:Scott.Warner@amec.com>]  
Sent: Friday, May 25, 2012 15:00  
To: Janda, Danielle L CIV NAVFAC SW  
Cc: stensby.david@epa.gov; Clark, David J CIV NAVFAC SW; Sullivan, James B CIV NAVFACHQ, BRAC PMO; William Carson; Myriam Zech; Remedios Sunga; Kelly.Pretzer@sfgov.org; Michael.Tymoff@sfgov.org  
Subject: Report Comments: TI Sites 6 and 12 - 2011 Groundwater Monitoring Report

Dear David, Jim, and Danielle. On behalf of TIDA, please accept these comments on the Draft 2011 Annual Groundwater Monitoring Report for IR Sites 6 and 12, April 2012. Please let us know if you have any questions on our comments or require additional information. Thank you very much.

Scott

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Scott D. Warner, CHG, CEG  
Principal and Global Practice Area Leader/Environmental Remediation  
AMEC  
Environment & Infrastructure  
2101 Webster Street, 12th Floor, Oakland, CA 94612 USA  
Tel +1 (510) 663-4100, fax +1(510) 663-4141  
Direct +1 (510) 663-4269, mobile/cell +1(415) 328-0955  
[scott.warner@amec.com](mailto:scott.warner@amec.com)  
[amec.com <http://www.amec.com/>](http://www.amec.com/)

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1. General comment for throughout the document: When referring to analytical results of samples, note that the results refer to concentrations specific to the groundwater sample collected from the well, not a concentration of or in the well.
2. Executive Summary, Page ES-2. For the Executive Summary, consider adding a line indicating the observed "trends" associated with each of the bulleted "results" rather than just reporting the most recent single analytical result
3. Summary page ES-3. The conclusions provided for the occurrence of dissolved metals - arsenic and copper - are not supported by comprehensive discussion within the main body of the report. Please add a more thorough discussion within the appropriate areas of Sections 4 and 6.
4. Section 3.2, Page 3-2, Third paragraph (and other similar pages). When presenting calculated groundwater gradient values, consider changing the term to "hydraulic gradient", identify the value as relating to the "lateral" or "vertical" direction of the gradient value, and indicate the wells, or well pairs used in calculating the gradient value. Also note that the gradient values relate to the direction of the gradient only, and does not refer to actual groundwater flow for which a direct measurement is not made.

5. Section 3.3, Page 3-3, Second paragraph. Because well 12-MW08 was not sampled because of its reported presence in an area of water inundation within an excavation area, please confirm that no surface water is believed to have entered this well through its well vault and surface seal.
6. Section 3.3, Page 3-4. Second paragraph. Please provide the reference used for the standardized methods used to collect field parameters. This includes providing the specific parameter indicating "stabilized" parameters according to low-flow guidelines (i.e., please provide the reference criteria in this paragraph as well as providing citation for the technical reference).
7. Section 4.0, Page 4-1. General. Please provide a presentation, discussion, and evaluation of the field parameters, notably, reduction-oxidation conditions and dissolved oxygen conditions during this and past monitoring events. These parameters are important to assessing both the fate and migration and attenuation of organic compounds as well as metals (arsenic and copper) detected in groundwater samples. Both tables and figures may be used to support the evaluation of these parameters. Such analysis is important also to any text in the document that refers to the fate and migration of metals in groundwater beneath the subject area.
8. Section 4.1, Page 4-2. Embedded Table. A suggestion is to provide a definition for the trend terms used in the table; i.e., please use some semi-quantifiable definition for the terms "increasing", "decreasing", "slightly" and "erratic" so as to give the reader a more representative sense of the long-term trends in the data. Same comment for subsequent tables where the term "relatively stable" is used.
9. Section 4.3, Page 4-5. Please clarify the term "concentration spikes" for well 12-MW17 and what this implies.
10. Section 6.2, Page 6-6. Copper appears to be above the screening criteria (See Figure 10) for the sample from well 12-MW13; therefore, monitoring of this well should continue.

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