



DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY, WEST
NAVAL FACILITIES ENGINEERING COMMAND
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IN REPLY REFER TO :

19 June 2003

From: Commanding Officer, Engineering Field Activity West, Naval Facilities
Engineering Command

To: Distribution

Subj: **RESPONSE TO COMMENTS ON THE DRAFT FINAL SAMPLING AND
ANALYSIS PLAN ADDITIONAL REMEDIAL INVESTIGATION FOR
THE TAYLOR BOULEVARD BRIDGE (SITE 30) AND THE TIDAL
AREA LANDFILL (SITE 1), NAVAL WEAPONS STATION SEAL BEACH
DETACHMENT CONCORD, CONCORD CALIFORNIA**

Encl: (1) Responses to US EPA Comments on Draft Final Sampling and Analysis Plan
for Additional Remedial Investigation for the Taylor Boulevard Bridge (Site 30)
and the Tidal Area Landfill (Site 1), Naval Weapons Station Seal Beach
Detachment Concord California (April 19, 2003)

1. The Navy issued the document "Draft Final Sampling and Analysis Plan for
Additional Remedial Investigation for the Taylor Boulevard Bridge (Site 30) and the
Tidal Area Landfill (Site 1), Naval Weapons Station Seal Beach Detachment Concord
California" on 19 April 2003. In accordance with Sections 10.9 and 22.2 of the Federal
Facility Agreement (FFA), draft final Primary documents serve as the final Primary
document if no Party invokes dispute resolution within thirty (30) days of issuance of the
draft final document. On 19 May 2003 the US EPA provided a letter of approval on the
subject draft final sampling plan; however, their letter included reactions to four of the
Navy's responses to their comments on the draft plan. The EPA's reactions and Navy's
responses are worthy of note and are provided as enclosure (1). The Navy plans to
implement this now final sampling and analysis accordingly.

2. If there are any questions or comments regarding the enclosure (1), please contact the
undersigned at Telephone No. 650-746-7451.

Sincerely

A handwritten signature in black ink, appearing to read "Stephen F. Tyahla", is written over a horizontal line.

STEPHEN F. TYAHLA, P.E., CHMM
By Direction

19 June 2003

Subj: RESPONSE TO COMMENTS ON THE DRAFT FINAL SAMPLING AND ANALYSIS PLAN ADDITIONAL REMEDIAL INVESTIGATION FOR THE TAYLOR BOULVDARD BRIDGE (SITE 30) AND THE TIDAL AREA LANDFILL (SITE 1), NAVAL WEAPONS STATION SEAL BEACH DETACHMENT CONCORD, CONCORD, CALIFORNIA

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**RESPONSES TO REGULATORY AGENCY COMMENTS ON THE
DRAFT FINAL SAMPLING AND ANALYSIS PLAN ADDITIONAL REMEDIAL
INVESTIGATION FOR THE TAYLOR BOULEVARD BRIDGE (SITE 30) AND THE
TIDAL AREA LANDFILL (SITE 1), NAVAL WEAPONS STATION SEAL BEACH
DETACHMENT CONCORD, CONCORD, CALIFORNIA**

Based on the U.S. EPA's review of the Draft Final SAP, the Navy has adequately addressed U.S. EPA's February 18, 2003, comments on the December 2002, Draft SAP, and therefore the Draft Final SAP is approved. However, U.S. EPA had reactions to four of the Navy's responses. This document presents the U.S. Department of the Navy's (Navy) responses to those four EPA comments. The comments addressed below were received from EPA on May 19, 2003.

RESPONSES TO U.S. EPA COMMENTS

1. **Comment:** (General Comment No. 2) U.S. EPA's February 18, 2003, General Comment No. 2 requested the Navy consider a Non Time-Critical Removal Action (NTCRA). This comment and a Navy draft response was discussed at length by the Navy and regulatory team at an April 2, 2003, Site 30 strategy meeting. U.S. EPA's understanding of the general agreement reached at the meeting was that the Navy was going to better acknowledge in its response the possibility of switching (post RI) to a removal action process. It was acknowledged by all that there are both positive and negative implications for a removal action, but the overall strategy is something to still be considered pre-feasibility study. It appears the Navy's Final response does not reflect the same view expressed by the Navy at a April 2, 2003, Site 30 strategy meeting.

Response: As agreed, the Navy will revisit the viability of conducting a NTCRA after evaluating the data collected during the upcoming field investigation. The Navy will conduct an internal assessment which it will review with the agencies in an informal manner.

2. **Comment:** (Specific Comment No. 3) Comment no. 3 indicated that U.S. EPA would accept groundwater characterization utilizing temporary groundwater sampling points (one set of groundwater grabs vs. two rounds of samples from permanent monitoring wells). U.S. EPA is not clear on the Navy decision to install permanent monitoring wells at ANY site for the collection of one round of samples (See related comment below regarding Specific Comment 8 addressing monitoring well design). While not formally objecting to the proposal to install monitoring wells, U.S. EPA believes that the proposal may not represent the best use of limited resources.

Response: The Navy appreciates this comment, but wishes to use a method that we believe will yield the most technically defensible groundwater data. Formetals, we feel this method is unfiltered samples collected from properly developed permanent wells. Although the Navy recognizes that well installation is more costly, the Navy also recognizes that the construction of shallow wells could save money in the long run because accurate results are necessary to assess potential contamination impacts to groundwater. The result of uncertain analytical data often culminates in the remobilization of a field sampling effort, which tends to be more expensive than the installation of wells.

3. **Comment:** **(Specific Comments No. 6) U.S. EPA comment sought primarily to identify perchlorate as contaminant of potential concern at the Site 1 Landfill for long-term assessment (which the Navy agreed to incorporate with the subject SAP. In response the Navy states, "[Site 1 Long-term Groundwater Study SAP] referenced in the [Site Management Plan] will not be submitted to the agencies until after the Landfill Cap ROD has been signed." U.S. EPA was not aware that there is a link between the Site 1 Containment Cap ROD and the Groundwater Study SAP. The Navy needs to comply with the Concord Federal Facilities Agreement in requesting extensions or modify and document changes to the Groundwater Study SAP schedule as part of the June 17, 2003 draft SMP Annual Amendment.**

Response: The Navy will comply with the Concord Federal Facilities Agreement in requesting extensions or modify and document changes to the Groundwater Study SAP. A "Pre-draft" SMP Addendum was submitted for agency review on May 15, 2003.

4. **Comment:** **(Specific Comment No. 8) U.S. EPA's comment sought to assist the Navy in designing groundwater monitoring wells that can provide representative and acceptable groundwater samples given the occurrence of problematic fine-grained subsurface soils. The Navy's response (that... ."Ottawa grade sand, ...C-778 sand or equivalent graded sand"...would be used for the filter pack) is not consistent with U.S. EPA groundwater monitoring guidance ("RCRA Ground-Water Monitoring Draft Technical Guidance, November 1992). Given the fine-grained soils and the Navy's proposal to collect only one round of groundwater samples, the proper selection of filter pack for collection of a representative (non-turbid) sample will be required.**

Response: Unfortunately, there is no sand pack that can keep the Bay Mud from coming into the well. Typical guidelines (Driscoll "Water and Wells" - standard text) suggest a grain size analysis of the formation followed by selection of a sand size that screens out 90% of the formation. EPA Guidance recommends using a sand pack that is 3 to 5 times the 50% retained diameter. Bay Mud is remarkable for its consistency throughout the San Francisco Bay Area. Bay Mud consists of more than 90% silt and clay sized particles. By definition, because the coarsest silt is 0.0025 inches, an effective sandpack would require inclusion of silt or very fine sand. An effective sand filter for Bay Mud is not commercially or otherwise available. Standard practice for throughout the region for monitoring wells in a Bay Mud makes use of the well screen and filter pack materials described in the sampling plan.