
Los Angeles Regional Water Quality Control Board

March 4, 2015

Mr. Everett Bole
DLA Installation Support - Energy
8725 John J. Klingman Road
Fort Belvoir, VA 22060

SUBJECT: REVIEW OF FIELD SAMPLING AND ANALYSIS PLAN AND SAMPLING STRATEGY

SITE/CASE: DEFENSE FUEL SUPPORT POINT NORWALK, 15306 NORWALK BOULEVARD, NORWALK, CALIFORNIA (SCP NO. 0286A, SITE ID NO. 16638)

Dear Mr. Bole:

The California Regional Water Quality Control Board (Regional Board) received the technical documents titled *Field Sampling and Analysis Plan and Sampling Strategy* (Plan), dated February 11, 2015, and *Request for Confirmation Sample Frequency Modification* (Request), dated February 13, 2015. These technical documents, prepared by The Source Group, Inc., on your behalf, for the above referenced site (Site), are in response to our letter, *Review of Soil Remediation Action Plan and Soil Management Plan*, dated January 7, 2015.

We have reviewed the technical documents and have the following comments:

1. The Request proposes that the tensiometer will be used to periodically check several locations on intervals of 3 to 5 days at depths of 1 to 3 feet below surface of the treatment stockpile. The Regional Board staff has a concern that since the height of treatment stockpile is 8 feet, soil moisture is not proposed to measure at depths lower than 3 feet below surface of the pile. Therefore, include soil moisture measurement below 3 feet. The staff recommends to use a grid pattern of 50 cubic yards for the sample locations.
2. The Request proposes that, if tensiometer readings within the treatment stockpile are approaching the lower limit of the field capacity range of 40 percent, water will be applied through the vapor control piping. The Regional Board staff has a question about how will the water be evenly distributed in order to control the moisture in the treatment stockpile.
3. The Request proposes that the amount of water needed to be added through the soaker hoses and vapor control piping will be based on calculations. The Regional Board staff has a question on how this calculated amount of water will be applied in the treatment stockpile, and recorded.
4. The Plan includes a soil confirmation sampling protocol for untreated clean soil stockpile size of 333 cubic yards. The Regional Board staff concurs with this approach. Note that stockpile up to

2,000 cubic yards of the untreated clean soil was proposed in the *Soil Management Plan*, dated November 5, 2014. However, the Plan does not include the sampling strategy for 2,000 cubic yards.

5. The Plan includes a post-excavation confirmation soil sampling protocol. It is proposed that samples will be collected using a grid pattern of 50 feet for the excavation floor area. However, the numbers of soil samples are not provided.
6. The Plan proposes that all soil samples will be collected using brass or butyrate tube wide mouth glass jar for volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH) analyses. The Regional Board staff disagrees with using this sample container. All soil samples for VOCs analysis should be collected in accordance with EPA Method 5035.

Therefore, revise the Plan and the Request to address the above comments 1 through 6. You may combine into one technical document. Submit the technical document by **April 10, 2015**.

If you have any questions, please contact Mr. Paul Cho at (213) 576-6721 (paul.cho@waterboards.ca.gov).

Sincerely,



Paul Cho, P.G.
Site Cleanup Unit III

cc: See Mail List

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