

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
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Alex Dong  
Head, West Central Environmental Section  
Naval Facilities Engineering Command  
P.O. Box 727  
San Bruno, CA 94066

Subject: Regional Board staff response to reports on pollution problems at the Hunters Point Naval Shipyard (Disestablished) site in San Francisco

Dear Mr. Dong:

Thank you for organizing the 2-21-86 orientation meeting at the Hunters Point Naval Shipyard (disestablished) in San Francisco. It was a very productive meeting and gave us the opportunity both to familiarize ourselves with the facility and with the people involved with the environmental issues at the site. The purpose of this letter is to follow up on agreements made at that meeting and provide you with formal Regional Board staff response on the reports you have submitted to us to date.

Regional Board staff finds the 10-84 WESTEC Services "Initial Assessment Study" (IAS) for the site acceptable provided that the comments made by any of the regulatory agencies at the orientation meeting and any relevant comments given below are taken into consideration. If in the future information suggesting the occurrence of a significant potential source of water pollution becomes available for either those sites for which a confirmation study was judged unnecessary or for sites other than those considered in the IAS report, Regional Board staff may request that further work be initiated on these sites.

Regional Board staff further finds EMCON Associates 1-86 "Proposed Verification Step Plan of Action, Hunters Point Naval Shipyard San Francisco, CA" acceptable provided the comments given below are taken into consideration.

EMCON's proposed well development procedures are inadequate. Proper well development prior to every sampling event should involve purging the well until conductivity and pH measurements stabilize. The consultant should make a note of each well that is not adequately developed due to low yields or some

other practical consideration, since analytical results from these wells may be inconsistent. Furthermore, as discussed at the 2-21-86 meeting, procedures for cleaning the sampling pump should be provided.

Each site of concern at the facility is addressed below:

**Oil Reclamation Ponds:**

Regional Board staff finds EMCON's confirmation approach for this site acceptable. However, to assess both the soil's permeability as well as the tidal influence on the site it is suggested that the groundwater elevations in the wells be continuously monitored throughout an entire tidal cycle.

**Industrial Landfill:**

Regional Board staff finds EMCON's confirmation approach for this site acceptable. However, as discussed at the 2-21-86 meeting, drilling cores may consist of hazardous materials and must therefore be containerized and sampled for analysis to assess appropriate disposal. A written procedure for accomplishing this task should be submitted to this office for approval prior to initiating the field work.

**Scrap Yard:**

Regional Board staff finds EMCON's confirmation approach for this site acceptable. As discussed at the 2-21-86 meeting, split soil samples should be taken to allow STLC analysis of the sample in the event that TTLC analytical results are greater than the state's STLC limits. Regional Board staff agrees with the DOHS request that arsenic be included for analysis in the initial testing.

**Old Transformer Yard:**

Regional Board staff finds EMCON's confirmation approach for this site acceptable. As discussed at the meeting, soil samples should be to at least a one foot depth because of the possibility of clean soil covering former surface soil.

**Bay FIII:**

Regional Board staff finds EMCON's confirmation approach for this site acceptable.

**Battery and Electroplating Shop:**

Regional Board staff finds EMCON's confirmation approach for this site acceptable.

**Sub-Base Sand-Blast and Painting Area:**

Regional Board staff finds EMCON's confirmation approach for this site acceptable. However, Regional Board staff believes that since operations at the site were quite diversified, EPA analytical methods 624 and 625 should be used as an initial screen of organics at this site.

**Building 521 - Power Plant:**

Regional Board staff would like information on the presence of underground tanks at this facility since a riser pipe was noticed at the rear of the building during the 2-21-86 site visit.

**Pickling and Plate Yard:**

As discussed at the 2-21-86 meeting, sludge samples from the tank bottoms and the containment sump will be taken for appropriate metals analyses to assess disposal needs. Similarly scrape samples of the green-colored material from the plate yard (believed to be zinc chromate) will be taken to determine appropriate disposal.

**Tank Farm:**

As discussed at the 2-21-86 meeting, the containment capacity of the berms at this site will be evaluated and further historical research will be conducted.

We look forward to receiving EMCON's ammended Verification Workplan which will incorporate regulatory agency comments. Following regulatory agency approval of that plan, verification work at the site can begin.

Thank you for your cooperation with us in this important matter. If you have any questions, please call Philip Mellen at (415)464-1247.

Sincerely,



Michael J. Ammann,  
Section Leader,  
Toxics Cleanup Division

- cc. Jerry Marcotte, California Department of Health Services
- Allan Lui, California Department of Health Services
- .. Nick Morgan, United States Environmental Protection Agency
- Russ Scharlin, EMCON Associates
- CDR Waddell, U.S. Navy