STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704



July 9, 1987

Commander Chris Guild
Western Division
Naval Facility Engineering Command
P.O. Box 727
San Bruno, CA 94066-0720

Dear Commander Guild:

At a meeting on June 4, 1987, you requested that we review the Verification Step/Confirmation Study Report for the Hunters Point Naval Shipyard dated March 19, 1987. We have completed our review and our comments are provided below.

Background

In January, 1986, the Navy submitted a Plan of Action for the Verification Step of the Confirmation Study. This plan was reviewed by the Department based on information known about the site at that time. In response to comments received from the Department and other agencies, the Navy submitted a revised Plan of Action in April, 1986. The revised plan was reviewed and approved, with minor modifications, by the Department on June 13, 1986.

The purpose of the Verification Step, as stated in the plan was "to document the existence or non-existence of hazardous or toxic materials by means of chemical analyses performed on samples obtained from the 11 study sites." These 11 sites were chosen for further investigation based on the recommendations of the Initial Assessment Study completed in October, 1984, and comments provided by the Department and other agencies.

General Comments on Adequacy of Scope

While we believe that the Verification Step was useful in documenting the existence of hazardous substances at the 11 study sites, we are concerned that the Navy has not adequately documented the non-existence of hazardous substances in other areas. New information about past disposal practices at the Hunters Point Naval Shipyard suggests that contamination may extend beyond the areas that were further investigated during the Verification Step. The investigation of Triple A by the San Francisco District Attorney and the Department has turned up information which suggests that hazardous wastes were improperly disposed in a variety of locations at the site. Furthermore, a large previously unknown PCB-contaminated area was recently discovered near Building 503. In light of this new information,

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we believe that areas which were previously believed to be uncontaminated should be further investigated.

General Comments on Risk Assessment

The Plan of Action called for a "conclusion regarding whether contamination has the potential to or is presently affecting the environment or human health". The Verification Step/Confirmation Study Report did not evaluate health effects and the potential for contaminants to migrate through each possible pathway. The report's conclusions and recommendations are based either on criteria that are designed for use in classifying wastes for off-site landfill disposal (TTLC & STLC) or on concentration limits that have been applied to protect groundwater in another part of the state. In the next phase of investigation, health-based criteria should be used to evaluate potential health risks posed by contamination.

Specific Comments on Field Work for Each Site:

Oil Reclamation Pond

- The report should elaborate on the "magnetic anomalies" that were observed and why proposed borings had to be moved closer to the perimeter of the pond.
- The text indicates that five magnetometer traverses were run, however, Figure 1 shows only four traverses. This discrepancy should be resolved.
- The actual detection limit should be reported instead of "nd" (non-detected).
- The report indicates that "oil saturation was encountered in each boring ranging from 5 1/2 to 11 feet below ground surface to the total depth explored". Further work should be performed to determine the full nature and extent of this contamination.
- Table 8 lists a variety of "unknown compounds" with detectable amounts. The sample locations should be resampled and all unknown peaks should be identified.
- There is no "**" next to well o-3 in Table 14. Does this mean that the results are for a water sample instead of a floating product sample?

Industrial Landfill

- Geophysical surveys were conducted to locate the limit of the refuse fill and to identify subsurface obstructions. The results of these surveys should be presented. An explanation should also be provided,

indicated the reason for relocating borings I-3 and I-4.

- o The unknown organic film should be resampled and analyzed to determine its composition.

- o The Plan of Action called for field characterization using the HAZCAT manual to determine if cuttings should be sent for laboratory analysis. The report does not indicate whether or not this work was conducted. If this work was conducted, the results should be presented in the report.

- o Ground water elevations should be reported for each well.

- o The Plan of Action called for duplicate sampling. No duplicate sample results are presented. Were duplicate samples collected and analyzed?

Oil Transformer Storage Yard

Since PCB is the primary contaminant concern in this area, the grid spacing should comply with EPA's PCB guidance document.

Pickling and Plate Yard

- o The actual location of the facilities does not appear to be accurately portrayed on Figure 8.

- o The sampling and safety procedures specified for the site should be referenced.

Bay Fill Area

- o Groundwater elevations should be reported for each boring or well.

Tank Farm

- o The report concluded that the contamination inside the bermed area has been verified. However, it also suggested that, based on nominal amounts of hand excavation, the contamination and any future spill can be contained. Further investigation is needed to substantiate this claim.

Sub-base Sand-blast and painting area

- o The report does not indicate where the upgradient well specified in the Plan of Action is located.

- A description of the rationale used to locate boreholes should be presented.

Other General Comments

- There are no page numbers or section dividers for Volumes II, III, and IV. As a result, one has to search through pages and pages of data to find specific information from lab reports or well logs. This has made the review of this document difficult.

Recommendations

- The above comments must be addressed prior to or in the next phase of investigation.

- The full nature and extent of contamination in these 11 areas as well as the remainder of the site should also be addressed in the next phase of investigation.

- A detailed endangerment assessment should be conducted based on EPA's "Superfund Public Health Evaluation Manual".

- A draft work plan for the next phase (Remedial Investigation/Feasibility Study) should be prepared and submitted for review and approval by the Department. The work plan which is eventually approved must contain the following elements:

  1. Scoping Plan.
  2. Project Management Plan.
  3. Sampling Plan.
  4. Quality Assurance/Quality Control Plan.
  5. Data Management Plan.
  6. Health and Safety.
  7. Preliminary Endangerment Assessment.
  8. Endangerment Assessment.
  9. Feasibility Study.
  10. Community Relations Plan.
  11. Schedule.

We look forward to discussing this matter further at the scoping meeting scheduled on July 15.

If you have any questions or comments, please contact Chein Kao of my staff at (415) 540-3052.

Sincerely,

Howard K. Hatayama

Howard Hatayama, Chief
Site Mitigation Unit
North Coast California Section
Toxic Substances Control Division

cc: Amy Zimpfer, US EPA, Region IX
Bill Hurley, RWQCB SF Bay
David Wells, Environmental Health, City of San Francisco
Steve Castleman, S.F. Office of the District Attorney

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