



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 3, 2000

Mr. Richard Mach, Jr.
Southwest Division Naval Facilities
Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5180

SUBJECT: PHASE II SOIL VAPOR EXTRACTION (SVE) TREATABILITY STUDY (TS), PARCELS B,C AND E FOR HUNTERS POINT SHIPYARD

Dear Mr. Mach:

The Environmental Protection Agency (EPA) has completed review of the subject document dated June 23, 2000. As we discussed previously, we support the Navy's efforts in implementing the SVE treatability study using the previous Workplan with some modification. As you know, the concerns that EPA had with the previous TS were based on implementation rather than study design (i.e. saturated site conditions and duration of the test). Therefore, we are only providing comments on the additional details that were added to the Workplan. Our comments are provided below:

- 1) Please include a discussion of how the data will be evaluated during the first few months of the test. It was EPA's understanding that an evaluation of the data (this could be on an informal basis) would be provided at some point during the initial phase of the test for a preliminary evaluation of effectiveness and initiation of the Feasibility Study for Parcel C (a scoping meeting for the FS is currently scheduled for January 2001).
- 2) Please provide a brief explanation of how the soil gas data will be used. We appreciate the Navy's agreement not to use the soil gas data as part of a modeling effort to show potential risks from the inhalation pathway to a receptor inside a building, as this was a problem during the previous TS.
- 3) After reviewing the portion of the study to be conducted at IR-10, building 123, it may be appropriate to add additional baseline vapor monitoring probes, between 10-1 and IR-25, particularly within building 123 near RI boring: IR10B033 where vinyl chloride (VC) was detected in a grab groundwater sample. TCE was detected in groundwater during the RI at IR10MW28A and it may also be appropriate to have a vapor probe in the vicinity of that well. The RI soil and groundwater detections from VOCs at IR-10 are from as far back

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as 1992 and therefore we need to reevaluate, if we can, what is going on today, 8 years later. Also, we never found a soil source at IR10B033 but we did find VC at 5 ppb in the groundwater grab sample. This IR-10/building 123 location is the one closest to IR-25 - could the VC detected actually have come from IR-25 as opposed to an IR-10 source? Additional soil vapor monitoring probes could help answer these questions and potentially link IR-10 to IR-25 for the purposes of remediation.

EPA's technical support and contractor will be providing field oversight for EPA. We would appreciate receiving a field schedule as soon as one is finalized to arrange for site visits. If you have any questions regarding these comments, please call me at (415) 744-2387.

Sincerely,



Sheryl Lauth
Remedial Project Manager

cc: Mr. Dave DeMars, Navy
Mr. Chein Kao, DTSC
Mr. Brad Job, RWQCB
Mr. Jason Brodersen, TTEMI
Ms. Karla Braesemle, Weston
Ms. Claire Trombadore, EPA
Mr. John Chester, City of SF
Mr. Adam Klein, Techlaw