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

September 25, 2000

Mr. Richard Mach
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
BRAC Office
1220 Pacific Highway
San Diego, CA 92132-5190

RE: EPA Review and Comment, Draft Sampling and Analysis Plan, Parcel D Soil Site Delineation, Hunters Point Shipyard, August 24, 2000

Dear Mr. Mach:

EPA has completed its review of the above referenced document. Comments are provided in attachments to this letter. EPA further requests that the Navy address the comments provided orally by the regulators at the Parcel D meeting of September 12 in the draft final deliverable. In addition, it is EPA's understanding that the VOC sites which includes those with TPH issues will be addressed separately. Further, Parcel D sites posing potential threats to underlying groundwater will be addressed in a separate effort, most likely the revised FS, subsequent to the Navy's beneficial use determination due November 17, 2000.

If you have any questions about the attached comments, please contact me at 415-744-2409. I am in the office on Mondays, Tuesdays, and Thursdays.

Sincerely,

Claire Trombadore
Remedial Project Manager

cc: David Demars, Navy
Dale Altshul, Navy
Chein Kao, DTSC
Brad Job, RWQCB
Mike Wanta, TtEMI
Amy Brownell, City of SF
John Chester, City of SF
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ATTACHMENT 1

EPA Review and Comment
Draft Parcel D Soil Site Delineation Sampling and Analysis Plan
Hunters Point Shipyard

1. As discussed at the 9/12/00 Parcel D meeting, the soil sampling strategy in Parcel D SAP should follow that developed for Parcel B. Further the additional sidewall sampling possibilities should be added to the strategy. The text of the final deliverable and Figure 2 should be revised accordingly (including the initial sidewall sampling length being revised to 0 to 17 feet). As discussed at the meeting, the bullets on page 4 of the draft FSP should be revised to ensure that it is clear that regardless of depth, a five point composite sample will be collected per 500 sq. ft.

2. Please see attachment 2 of this letter for additional analytes recommended by EPA. Please revise Table 1 to include these additional analytes.

3. The document figures should include the most recent data gap sampling data collected by the Navy as part of the risk management review effort. For example, not all of the soil sample data collected at IR-37 during the RMR data gaps effort is included in the maps for IR-37 in the draft SAP. In the RMR, the maximum Mn hit at IR-37 was 3300 mg/kg at 3.75 feet in boring IR37B026 (see figure 1.15-2, sheet 2 of 3 under IR-37 in the Final RMR). However, I could not find this hit or the others per the data gaps effort on the IR-37, 37-1 figure presented in the draft Parcel D SAP. Further, per the draft Parcel D SAP, most of the delineation borings for 37-1 stop at 3 feet bgs even though the maximum Mn hit was below that depth at 3.75 ft. Also - Building 436 is incorrectly labeled 430 on Figure 6, IR-37, 37-1 of the draft Parcel D SAP. On Figure 7 for IR-37, 37-2, of the draft Parcel D SAP, the RMR data gaps effort results are not included.

4. EPA's QA Office did not review this deliverable. Please ensure that all applicable QA Office comments issued to the Navy on recent FSP and QAPjPs are incorporated into the final Parcel D soil SAP, as appropriate.

5. How will the Navy address potential matrix interferences at sites where PAHs and PCBs are being analyzed?

6. Page 5 of the FSP. Please clarify - will all sites be screened using a PID or other field screening tool? This is how the text reads now. Further, if a PID or other field screening tool indicates the presence of VOCs and the Navy samples where in the FSP/QA are these analytes addressed? EPA understands that the soil delineation effort is to support the TCRA which is solely a soil excavation effort for non-VOC sites.

7. How is the sampling strategy changed if obstructions are encountered? The regulators should be notified if the Navy is compelled to depart significantly from the sampling

strategy. What about field signs of soil contamination such as staining and/or odors? Field observations are briefly addressed on page A-14 of the QAPjP but not in the FSP. Should it me included in the FSP strategy? Will the Navy bias the soil sampling to address field observations of contamination and if so how? Is this potentially tied to the field instrument screening to be conducted at sites?

8. It is hard to tell looking at the FSP, Figure 1, IR-8 whether or not the proposed sampling effort extends sufficiently east/laterally to address all of the potentially contaminated soil locations identified during the RI. Does the current effort extend sufficiently into and across Hussey Street? PCB was detected in groundwater at IR08MW42A. Does the proposed delineation effort extend as far out into the street as this well and to boring IR08B007? Also, should the delineation effort extend as far out as IR08BO18A, particularly since the Navy's cleanup goal for PCB at IR-8 per Appendix 1/the TCRA is 1 ppm and the shallow soil sample at that location was greater?

9. The project personnel per pages A-1 to A-2 and figure A-1 of the Draft QAPjP should be updated as appropriate in the draft final deliverable.

10. How will the results of the sampling effort be presented to the regulators. Will the regulators be consulted prior to backfilling? Where will the data reported? In a construction summary report? Should this overall strategy be added to the SAP?

ATTACHMENT 2

Summary of Additional Potential Analytes
Parcel D Soil Site Delineation Sampling and Analysis Plan
Hunters Point Shipyard

IR-Site	RA or DM	Navy Analytes	EPA Recommended Analytes	Rationale
IR-08	RA 8-1	A-1260 B(a)P Arsenic	All PCBs All PAHs Nickel Magnesium Cobalt Arsenic Navy may want to consider including TPH oil/diesel	Known PCB spill at IR-8. The RI notes break in a steam line used to transport waste oil containing PCBs. The sample from boring IR08B020 at 6.25 feet contained 1800 mg/kg nickel. In the Parcel D RI, the HPAL for nickel was calculated using a magnesium regression.
IR-08	RA 8-2	A-1260 B(a)P Arsenic	All PCBs All PAHs Nickel Magnesium Cobalt Arsenic Navy may want to consider including TPH oil/diesel	Known PCB spill at IR-8. The RI notes break in a steam line used to transport waste oil containing PCBs. The sample from boring IR08B020 at 6.25 feet contained 1800 mg/kg nickel. In the Parcel D RI, the HPAL for nickel was calculated using a magnesium regression.
IR-09	DM 6864/ IR09B003	Total Cr Cr VI	Total Cr Cr VI Nickel Magnesium Cobalt	Nickel was detected at a concentration of 4,200 mg/kg in boring IR09B003 at 5.75 feet. In the Parcel D RI, the HPAL for nickel was calculated using a magnesium regression.

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IR-09	DM 6965/ IR09B006	Total Cr Cr VI	Total Cr Cr VI Magnesium	Magnesium needed for regression calculation.
IR-09	DM 7167/ IR09B011	Total Cr Cr VI	Total Cr Cr VI Magnesium	Magnesium needed for regression calculation.
IR-09	DM 6967/ IR09B007	Total Cr Cr VI Arsenic	Total Cr Cr VI Magnesium Arsenic	Magnesium needed for regression calculation.
IR-37	RA 37-1	Mn A-1260	Mn All PCBs All PAHs Nickel Magnesium Cobalt Navy may want to consider including TPH oil/diesel	This site is located south of Building 436, which was used as a painting and paint storage facility. The RI indicates the contamination is due to a possible spill of waste diesel oil containing PCBs. Nickel was detected at a concentration of 1570 mg/kg in boring IR37B014 at 5.75 feet. In the Parcel D RI, the HPAL for nickel was calculated using a magnesium regression.
IR-37	RA 37-2	Antimony	Antimony Nickel Magnesium Cobalt	Nickel was detected at concentrations of 1600 mg/kg and 1420 mg/kg in borings IR37B010 and IR37B013A, respectively at a depth of 5.25 feet. In the Parcel D RI, the HPAL for nickel was calculated using a magnesium regression.
IR-37	DM 6671	Mn	Mn	No other analytes recommended.

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IR-37	DM 6771	Mn	Mn Nickel Magnesium Cobalt	Nickel was detected at concentrations of 2250 mg/kg and 1840 mg/kg in borings IR37B021 and IR37B020, respectively, at a depths of 5.5 and 6.25 feet. In the Parcel D RI, the HPAL for nickel was calculated using a magnesium regression.
IR-53	DM 11260	B(a)P D(a,h)A	All PAHs Navy may want to consider including TPH oil/diesel	Soil samples from boring IR53B018 contained other PAHs above industrial PRGs.
IR-55	DM 10676	Lead	Lead	No other analytes recommended.
IR-65	DM 8866	Arsenic	Arsenic Aroclor 1260	A transformer was noted near this location. Aroclor was slightly elevated in the shallow samples of 2 borings at this DM area, including in IR65B004, the same boring in which the elevated Arsenic was detected. Aroclor was not present above the cleanup goal but since the detections were in the shallow/surface samples and PCBs are so persistent, perhaps it would be appropriate to include for Aroclor as an analyte for this DM area.

Notes:
A-1260: Aroclor-1260
B(a)P: benzo(a)pyrene
PCBs: Polychlorinated biphenyls
PAHs: Polynuclear aromatic hydrocarbons
TPH: Total Petroleum Hydrocarbons
Cr: Chromium
Cr VI: Hexavalent Chromium
Mn: Manganese
D(a,h)A: Dibenz(a,h)anthracene