

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704



February 3, 1988

Commanding Officer
Naval Station, Treasure Island
Hunters Point Annex
(Attention: LCDR. G. Thomas, USN)
San Francisco, CA 94130-5000

Dear Mr. Thomas:

RE: Draft Scoping Document for Hunters Point Annex

We have reviewed the Draft Scoping Document dated November 13, 1987. Based on this review, we have determined that the document is not consistent with the requirements of the Remedial Action Order. Therefore, it cannot be approved.

Attached are our comments regarding the draft document. These comments must be addressed in a revised Scoping Document. Pursuant to Section 6.9 (b) of the Remedial Action Order, please modify and resubmit the Scoping Document by March 3, 1988.

Should you have any questions, please contact Chain Kao of this office at (415) 540-3052.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Matayama".

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

Enclosures

cc: Alex Dong, WESTDIV
Roger James, RWQCB
Keith Takata, EPA Region IX
Scott Lutz, BAAQMD
Steve Castleman, SFDA

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D/N 22

DHS COMMENTS ON HUNTERS POINT SCOPING DOCUMENT

I. GENERAL COMMENTS

This draft Scoping Document (Document) provides a good general review of the history of operations at Hunters Point Annex (HPA), as well as the results of previous investigations on specific sites within the facility. However, there are several areas of concern that the Department of Health Services (Department) would like to address. These concerns and comments are provided below.

A. PREVIOUS INVESTIGATIONS

The draft Scoping Document largely relies on conclusions reached in the Navy's Initial Assessment Study (IAS), concentrating on those sites identified in the IAS. As a result, it omits important information necessary to identify specific data gaps and justify the exclusion of non-IAS areas from further study. Table 5-1 in the IAS listed 34 buildings or areas as industrial waste sources, and Table 8-1 (in the IAS) listed 8 buildings where liquid wastes were generated. Yet no justification is given in the Scoping Document (hereafter referred to as Document) as to why the majority of these sites were not recommended for the Remedial Investigation (RI).

The Document acknowledges that time constraints placed on the consultant for the submittal of this Document played an important role in this omission. The Department will give the consultant additional time to correct this deficiency.

B. WASTE CHARACTERISTICS

As described in Section 5.2.1 (b) of the Remedial Action Order (RAO), the Scoping Document should include a list of all hazardous wastes and hazardous substances which were disposed, discharged, spilled, treated, stored, transferred, transported, handled or used at the site. The draft Scoping Document did not provide such list. Trade or commercial names (such as "metal conditioner", "Penestrip CR" or "Stoddard Solvent") should also be identified by their specific chemical makeup, where available.

C. ADDITIONAL SAMPLING REQUIREMENTS

The Document does not adequately address the issue of a comprehensive site investigation. Instead, the Document

concentrates almost entirely on specific areas within Hunters Point Annex. The Department is concerned that, because of the length of time the facility has been in operation, the types of activities that occurred, as well as the known and alleged illegal disposal of hazardous wastes on-site by Triple A, the scope of the contamination at HPA has yet to be adequately defined. Therefore, the Department will require that additional sampling of the soil and ground water be conducted in areas where limited or no sampling has previously occurred, unless sufficient justification can be provided that no sampling is necessary.

The Document discusses specific sampling strategies for the IR sites on the facility, covering such topics as the number of borings and wells, sampling intervals and sample test methods. The Department feels that it is inappropriate to discuss sampling strategy in a manner that limits the actions of responsible parties and their consultants, regardless of potential changes in the scope of the investigation as new data are collected. Because of this, the Department does not approve of the sampling strategy at this time. However, to guide the Navy and their consultants for future sampling plans, our recommendations on the sampling strategy are given in the Specific Comments section of this letter.

Since large quantities of liquid waste were historically disposed of via storm or combined sewers, these sewer lines should be pressure-tested and soil samples should be collected where leaks are found.

D. SCOPE OF FUTURE INVESTIGATIONS

Throughout the draft Scoping Document, particularly in the Remedial Investigations and Field Investigation sections, contradictory statements concerning the scope of future investigations are given. Specifically, general statements within the Document imply a comprehensive study will be conducted to include additional contaminated sites in the Remedial Investigation (RI) as they are discovered. However, in the Field Investigation section of the Document, limitations to future investigations are imposed, not only on known sites but on undiscovered sites as well. The Navy will need to develop a better rationale to justify the exclusion of sites from the RI. This rationale should, in principle, follow along the lines of the Preliminary Assessment (PA) and Site Investigation (SI) process used by the Environmental Protection Agency (EPA). However, the primary objective of the PA and SI process for Hunters Point Annex should be to identify and assess the presence of

contaminants, not to rank the site for possible inclusion into the National Priority List (NPL).

E. BACKGROUND DISCUSSIONS

One additional minor comment refers to page 60 et seq.. The site-specific field investigation proposals are preceded by sometimes lengthy background discussions. Section 2.0 of the Document should refer the reader to the Field Investigations Section for additional information, or the information in the Field Investigations Section should be moved to Section 2.0.

In addition, until site-specific cleanup criteria are developed for this site, it is inappropriate to reference any unrelated criteria (such as: TTLC, STLC, or Drinking Water Standard), even for comparison purposes.

II. SPECIFIC COMMENTS

A. FIGURES AND APPENDICES

1. A map of the site describing the topography and geology was omitted from the draft scoping document. This map should be included in the final draft, and should at least outline the surficial exposures of bedrock, bay mud, sands and artificial fill.
2. Pursuant to RAO Section 5.2.1(e), the Scoping Document should specifically describe "The nature and extent of problem, including a summary of the actual and potential on-site and off-site health and environmental effects". No description of actual or potential health and environmental effects associated with known or suspected hazardous substances on the site was included in the Document. We acknowledge that this subject will be treated fully in the Public Health Evaluation, but a preliminary summarization of the above effects should be included in the appendix.
3. Lithologic logs for the monitoring wells and borings used to construct the cross-sections in the Document were omitted. The department acknowledges that inclusion of such a large volume of data into the Document is redundant, so we recommend that an appendix be included in the final draft that references specific documents and page numbers where these logs can be found. In addition, where adequate data exist, groundwater elevations and preliminary groundwater flow

directions for the uppermost aquifer should be plotted and included on a map which is included in the Scoping Document.

B. SECTION 1.0, INTRODUCTION

1. Page 1: the objectives of the RI/FS and the main purpose of the scoping document should not deviate from that stated in the Department's Remedial Action Order. For example, the Department's Order requires the Respondents to "determine the nature and full extent of contamination of air, soil, surface water and groundwater..." The Navy has modified this objective to only "evaluate the lateral and vertical extent of contamination in air, soil, surface water, and groundwater."
2. Underground Storage Tank (Page 5): This section should be modified to indicate that if a tank is found leaking, the area will be investigated to determine the extent of contamination.
3. Uninvestigated Areas (Page 5): A workplan should be developed for any uninvestigated area to generate new data in order to determine if any further investigation is needed.

C. SECTION 1.2, REGULATORY AGENCY AGREEMENTS AND ACTIONS

This section should be deleted. The Department feels it is inappropriate to include these statements in the Scoping Document. Furthermore, some of these statements are incorrect or outdated. The Department is not going to consolidate all agency comments on the Scoping Document, but rather will take the initiative to try and resolve any conflicts in the agency comments.

D. SECTION 2.4, PREVIOUS STUDIES

While the Department acknowledges the existence of these previous studies, it should be noted that the Department did not approve these studies. Therefore, the approval of a Scoping Document which summarizes all previous studies should not be construed as an approval of the conclusions and recommendations of these other studies.

E. SECTION 2.5, CHEMICAL CONDITIONS

The Document states "...there is no evidence of an acute immediate hazard to human health at the ground surface." No evidence is given in this section to justify this statement. This statement should either be deleted or qualified to indicate that there is a potential acute or chronic hazard to human health.

SECTION 2.5.1, PAST DATA VALIDATION

Past data validation should be conducted in accordance with EPA's QAMS-005/80 as specified in the RAO and guidance provides by EPA staff in Region IX.

F. SECTION 2.7, ONGOING INVESTIGATIONS

The Document mentions that several investigations are currently underway or planned for sites not included in the RI. However, the results of these studies may result in some sites being added to the RI. Since several of these investigations deal with known or potential contamination, additional justification should be given for not including the following investigations in the comprehensive RI:

1. South Pier Site Survey
2. Underground Tank Program
3. Triple A Site Investigations
4. Hazardous Materials/Wastes Inventory

SECTION 2.7.1, MILCON SITE STUDIES

The investigations of construction suitability should be consistent with the work proposed for uninvestigated areas. Construction at an uncontaminated site should not occur unless it is demonstrated that: 1) such construction is compatible with remedial investigations activities and remedial actions which may be necessary at or near the site; and 2) such construction will not result in the exposure of workers or occupants to elevated levels of hazardous substances near the site or during transit to and from the site.

G. SECTION 3.0, REMEDIAL INVESTIGATIONS

Page 46: The RI proposal mentions 11 specific sites to be investigated, in addition to several unspecified Triple A

sites. The Navy further states they may investigate other areas of Hunters Point Annex. Under this scenario, it is possible that portions of Hunters Point Annex will not be investigated and that unknown contaminated areas will be overlooked. To minimize this possibility, a comprehensive investigation of the entire site should be conducted, and sufficient justification should be provided for excluding any areas from further sampling.

H. SECTION 3.1.3 THROUGH 3.1.9

The items in these sections should not be in the Scoping Document. They should be included in the RI/FS Workplan.

I. SECTION 3.3, FIELD INVESTIGATION

1. Page 57: The Navy states that detailed sampling will be performed where chemicals have been found at high or toxic levels. This implies that only highly contaminated areas warrant further sampling. Since early sampling efforts at some areas were only reconnaissance surveys, the possibility exists that hot spots of contamination have been overlooked. Furthermore, the full lateral and vertical extent of contamination is not known. Therefore, additional soil sampling and ground water monitoring should be performed at all sites where contamination is known or suspected.
2. Page 58: The general RI proposal states that ground water samples may be collected, without discussing criteria for the exclusion of sampling. A sufficient number of groundwater samples must be collected and analyzed from every site where borings or monitoring wells have been or will be drilled or installed to determine the full lateral and vertical extent of groundwater contamination at Hunters Point Annex.
3. Page 58: The RI proposal states that soil samples will be collected at lithologic changes or at least every five feet. The Department agrees in general with this sampling strategy, provided that every shallow boring is sampled at a minimum of 5-foot intervals. Deep borings (greater than 30 feet deep) may be sampled at lithologic changes, but only when a shorter sampling interval is not warranted.
4. Page 58: The Document indicates that the possible presence of radioisotopes may be investigated by

surface scans only where radioactive sources are suspected. Additional information should be provided on the scope of this effort. We will require comments from an industrial hygienist with expertise in radioactivity regarding the suitability of these surveys to detect significant amounts of radioactive contamination.

5. Page 59: Statements in the Document pertaining to monitoring well installation, water sampling, ground water monitoring and aquifer testing are worded in such a way as to imply they are optional. The Department emphasizes that these tasks are necessary and appropriate to the remedial investigation. Therefore, these statements should be revised to indicate that these activities will be conducted.

SECTION 3.3.1, INDUSTRIAL LANDFILL, IR-1

1. In addition to a surface scan for radioactivity, subsurface soil samples should also be scanned for beta and gamma radiation.
2. A minimum of three deep monitoring wells should be completed in a deeper permeable unit.

SECTION 3.3.2, BAY FILL AREA, IR-2

1. At least ten shallow and three deep monitoring wells should be installed.
2. Soil samples should be collected from the borings at intervals no greater than 5 feet.

SECTION 3.3.3, OIL RECLAMATION PONDS, IR-3

The RI proposal in the Document for this site appears adequate at this time. However, it may be necessary in the future to expand the scope of the investigation should additional contamination be discovered.

SECTION 3.3.4, SCRAP YARD, IR-4

1. STLC and TTLC values are used primarily to regulate disposal of hazardous and extremely hazardous wastes, and should not be used for risk assessment or to establish clean-up levels. References to these values

in the Document may mislead the general public and should be deleted.

2. At least 10 soil borings should be drilled to depths between 10 and 15 feet. Soil samples should be taken at the surface and 2.5, 5, and 10 (also 15 feet, where attainable) below surface. Soil samples at 10 and 15 feet may be omitted if samples above 5 feet reveal non-detectable contaminant concentrations.
3. At least one deep well should be installed at this site.

SECTION 3.3.5, OLD TRANSFORMER STORAGE YARD, IR-5

At this time, the RI proposal outlined for this area appears adequate with one exception: at least one deep monitoring well should be installed at this site to assess hydrogeology.

SECTION 3.3.6, TANK FARM, IR-6

1. At least one deep well should be installed at this site.
2. Soil samples should be collected from the unsaturated zone at no greater than 5-foot intervals.

SECTION 3.3.7, SUB-BASE AREA, IR-7

1. A minimum of 5 shallow and 3 deep monitoring wells should be installed at this site.

SECTION 3.3.8, PCB SPILL AREA, IR-8

1. Additional soil samples from the borings should be taken at 2.5 feet depth.
2. One deep monitoring well should be installed for hydrogeologic assessment. Additional shallow wells should be drilled to replace those destroyed by construction.

SECTION 3.3.9, PICKLING AND PLATE YARD, IR-9

A minimum of 4 shallow and 2 deep monitoring wells should be installed at this site.

SECTION 3.3.10, BATTERY AND ELECTROPLATING SHOP, IR-10

At least three shallow and one deep monitoring well should be installed at this site.

SECTION 3.3.11, POWER PLANT, IR-11

At least one deep well should be installed at this site.

SECTION 3.3.12

All Triple A sites identified in the San Francisco District Attorney's court paper should be investigated. Work done prior to Department's involvement should be adequately documented and presented in the same fashion as any other RI/FS, or IRM site. The following statements should be deleted: "Triple A site 8 was not included...a building is being constructed at this site".

SECTION 3.3.13, OTHER AREAS

1. In both Study Areas A and B, additional shallow and deep monitoring wells should be established down-gradient of known contamination sources. Also, additional soil samples should be collected in these areas to determine the full nature and extent of any contamination.
2. In areas where no samples have been collected, historical use studies and soil and ground water sampling/ monitoring should be performed to adequately determine the presence or absence of contamination, assess hydrogeology and evaluate those areas that test positively.