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Mr. Dwight Hoenig
Department of Health Services
State of California
Toxic Substances Control Division
North Coast Section
2151 Berkeley Way, Annex 7
Berkeley, CA 94704

Dear Mr. Hoenig:

Enclosures (1) through (3) contain our responses to the comments from the Department of Health Services and the Regional Water Quality Control Board on the Draft Scoping Document for the Remedial Investigations/Feasibility Studies at Naval Station, Treasure Island, Hunters Point Annex. Enclosure (1) is a point-by-point summary of our responses to regulatory agencies' comments. Enclosure (2) is the revised Volume I of the Scoping Document modified to highlight revisions in order to facilitate review. Enclosure (3) is an errata sheet which identifies revisions to Volume II of the Scoping Document. Upon satisfactory review and acceptance of our responses by you and other regulatory agencies, final revisions will be incorporated to produce the final Scoping Document.

We request that you review enclosures (1) through (3) and provide your final comments within fifteen days of the date of this letter. We appreciate your cooperation in expediting your review. Comments should be directed to Commander, Western Division, Naval Facilities Engineering Command (Attn: Mr. Alex E. Doug, Code 1145, (415) 977-7502).

Sincerely,

P. W. DRENNON
CAPTAIN, CEC, USN
COMMANDER

Encl:

- (1) Navy Responses to Regulatory Agencies' Comments on Hunters Point Scoping Document
- (2) Revised Scoping Document Volume I
- (3) Scoping Documents Errata Sheet, Volume II

Copy to: (w/o encl)

- Regional Water Quality Control Board (Attn: Mr. Roger James)
- U.S. Environmental Protection Agency (Attn: Mr. Keith Takata)
- Bay Area Air Quality Management District (Attn: Mr. Scott Lutz)
- City and County of San Francisco (Attn: Mr. David Wells) (w/encl)
- San Francisco District Attorney (Attn: Mr. Steve Castelman) (w/encl)

NAVY RESPONSE TO DEPARTMENT OF HEALTH SERVICES COMMENTS ON HUNTERS POINT SCOPING DOCUMENT

Department of Health Services (DHS) comments (dated February 3, 1988) have been reproduced below (in boldface type) with the Navy's response presented below each DHS comment.

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.

RESPONSE:

No revisions to the Scoping Document are necessary in response to this comment.

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.

RESPONSE:

The Navy will evaluate available data from other potential source areas in performing a comprehensive investigation at HPA. This program is described below in the response to Comment IC, Additional Sampling Requirements.

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.

RESPONSE:

Tables 3, 4, and 5 of the Scoping Document contain all available information relative to chemicals used on site. The Navy believes these tables supply the necessary information as requested in Section 5.2.1(b) of the RAO. Where a commercial name has been used in the tables, a footnote has been added giving the corresponding chemical name, 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.

RESPONSE:

The Navy will perform a comprehensive investigation for HPA areas outside the IR and PA sites (Other Areas). The primary objective of this investigation is to identify and assess the possible presence of contaminants in the Other Areas. In general, the approach that the Navy will follow will be consistent with the EPA's PA (Preliminary Assessment) and SI (Site Inspection) guidance, although the objective will not be to rank the site for possible inclusion on the National Priority List (NPL). Rather, the purpose will be to identify areas that require some level of field investigation to assess the presence of contaminants in the soil and ground water.

The Navy will initiate the area-wide investigation by performing the equivalent of a PA, which will include but not be limited to:

- o Interviewing former Navy employees who worked at HPA
- o Examining Navy records describing
 - Building and land use
 - Chemical use, storage, and disposal
 - Information used to prepare the IAS

- o Examining additional data that may become available because of other ongoing Navy studies at HPA.

The information will be evaluated to define those areas of HPA where contamination is not likely to exist. In these areas, no further field investigation will be performed. These areas may include areas where land or building use studies show it is unlikely that contaminants would be present. Examples may include buildings where no chemicals were handled, or broad areas of pavement (where it is unlikely that illegal disposal may have occurred). The descriptions and justifications for no additional field investigation in these areas will be presented in reports separate from those which address the IR and PA sites.

In those areas where this initial evaluation indicates the possible presence of contaminants, an SI will be performed. The objective of the SI is to gather additional site-specific information, which may include, but not be limited to:

- o Site location and approximate area,
- o Type and quantity of contaminants or wastes stored or disposed at the site,
- o Potential hazards associated with the site,
- o Results of preliminary field sampling and chemical analysis (e.g., samples collected from sumps or the ground surface).

The results of the SI will be evaluated to determine where additional field sampling is warranted and those areas where cleanup activities such as debris removal are sufficient. Areas where further field investigation appears warranted will be added to the RI, and appropriate sampling plans will be prepared.

The Navy believes the approach presented above addresses the DHS concern that all sites that warrant investigation will be evaluated properly and that the entire HPA facility will be evaluated. This iterative approach was discussed in a teleconference with DHS on January 22, 1988.

The Document discusses specific 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.

RESPONSE:

The sampling strategies presented in the Document are intended to be conceptual and are not directed at limiting the scope of field investigations. The Navy recognizes the need to frequently evaluate the adequacy of any proposed sampling plan as additional data become available. The Navy has revised its sampling strategy as described in the Specific Comments Section; however, the final sampling strategy will be presented in the sampling plans.

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.

RESPONSE:

The inappropriateness of pressure testing the sewer system at HPA to detect leaks was discussed with the DHS in a teleconference with Mr. Chein Kao on February 16, 1988. In that discussion, the Navy explained that pressure testing of the HPA sewer lines is not feasible because of the large number of ancillary structures and appurtenances, such as flow diversion structures and cross-connects. The presence of these structures, the locations of which may not be known, will most likely result in ambiguous data from pressure testing. Mr. Chein Kao agreed with the Navy's assertion that pressure testing is not warranted. An alternative plan developed by the Navy and discussed with the DHS proposes to investigate the physical and hydraulic condition of the sewer lines by performing the following: 1) a survey of building use to identify areas where industrial waste discharges to the sewers may have been occurred in the past, 2) a physical inspection of selected lines, and 3) a video scan of selected lines. The Navy believes the information gathered from this effort will be more useful than pressure testing in evaluating the condition of the sewer system. The Navy will evaluate the results of the study and will perform field investigations in areas where a significant problem may exist, as appropriate. Mr. Chein Kao agreed with this approach and found it satisfactory for evaluating the potential for the release of contaminants from the sewer system.

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).

RESPONSE:

As previously stated in the response to Comment IC, the Navy will perform a comprehensive investigation at HPA. At this time, the Navy has not excluded any areas from further investigation. Proper documentation consistent with the PA/SI guidance will be provided to the regulatory agencies in order to justify exclusion of any sites from the RI.

The Field Investigation section of the Document is not intended to exclude any areas from possible future field investigation. The purpose of that section is to provide the Navy's conceptual approach to field investigations at sites where contaminants are known or strongly suspected to have been disposed or spilled (i.e., the IR sites). Sufficient information was available for those IR sites to adequately prepare the scope of the field investigation. For other areas, available data are not sufficient and those areas will be evaluated as described in the Navy's response to Comment IC.

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.

RESPONSE:

A paragraph referring the reader to Section 3.2 (former Section 3.3), Field Investigations, has been added to the Document at the end of Section 2.3, Site History.

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.

RESPONSE:

References to TTLCs, STLCs or drinking water standards have been removed from the Document.

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.

RESPONSE:

A map of the site showing the topography and geology has been added to the Document as requested.

2. Pursuant to RAO Section 5.2.1(c), 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.

RESPONSE:

A preliminary summary of the potential health and environmental effects has been added to the Document as Appendix G.

A more detailed preliminary evaluation will be provided in the draft Public Health and Environmental Evaluation Plan (in preparation); this preliminary evaluation is not ready for inclusion in the Scoping Document.

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, ground-water elevations and preliminary ground-water flow directions for the uppermost aquifer should be plotted and included on a map which is included in the Scoping Document.

RESPONSE:

The plates on which the cross sections appear have been modified to list the source document for the lithologic logs used in construction of the cross sections. Where appropriate, additional information is provided to further facilitate location of such lithologic logs (e.g., appendix or page citations). Insufficient water-level information exists to construct a water-level contour map or provide preliminary ground-water flow directions (other than as described in Section 2.2.2, Hydrogeology). Such maps will be included in the RI reports.

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 ground water ..." The Navy has modified this objective to only "evaluate the lateral and vertical extent of contamination in the air, soil, surface water, and groundwater."

RESPONSE:

The phrase, "To evaluate the lateral and vertical extent of contamination in air, soil, surface water, and ground water", has been revised to "To determine the nature and full extent of contamination in air, soil, surface water, and ground water".

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.**

RESPONSE:

The following sentence has been added to the description of the Navy's Underground Storage Tank program: "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.**

RESPONSE:

The Navy will proceed with investigating the "Uninvestigated Areas" as described in the Navy response to Comment IC.

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.

RESPONSE:

The Navy believes Section 1.2 is appropriate, as revised, and therefore has not deleted it from the document. However, the following revisions have been made to the section: 1) the title of the Section has been revised to "Regulatory Agency Coordination". The Navy believes this more closely reflects the intent of the discussion in Section 1.2; 2) the phrase, "It was agreed upon by these agencies and the Navy that ..." has been revised to "The Navy understands that ..."; and 3) The phrase "... to the DHS, who would consolidate the comments so that a consensus of opinion from the agencies could be provided to the Navy as the project progresses." has been revised to "... to the DHS which would take the initiative to try to 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.

RESPONSE:

No revisions to the document are necessary in response to this comment. The Navy understands that the Scoping Document only summarizes these previous 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.

RESPONSE:

The phrase in question has been deleted from the Document.

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.

RESPONSE:

The appropriate level of past data validation was performed in accordance with guidance received from Mr. Nick Morgan at the EPA Region IX. The Navy sought this EPA guidance at the request of DHS. As stated in the Document (Section 2.5.1), it was determined that the previous data would be used only to define areas where chemicals were likely to be present or absent and to develop the conceptual approach to the field investigation as presented in the Document. As described in the Document, the past data validation performed shows that the previous data are adequate for these purposes. A more rigorous validation could conceivably be performed in the future; the necessity of further validation depends on future uses of the data. This section has been revised to indicate that the EPA was consulted and gave approval for this level of past data validation, assuming the data were to be used as described above. Further data validation, if necessary, will be addressed in a separate submittal.

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

RESPONSE:

The results of these investigations will be evaluated to determine if they should be added to the RI. The Navy's procedure for doing this is described in the response to Comment IC.

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.

RESPONSE:

Appropriate revisions have been made to the Document. The investigations of these construction sites are consistent with the investigations of the uninvestigated areas. The specific objectives of each site study will include:

- a. Assess the proposed site for levels of chemicals that could preclude construction.
- b. Evaluate the site for localized chemicals that may be mitigated prior to, or during, construction.
- c. Assess the potential impact of construction on potential remedial studies/actions at other adjacent sites.
- d. Assess the potential health impacts of chemicals, if present, to the construction workers.
- e. Assess the potential health impacts of chemicals, if present, to the occupants of the facility.

The initial evaluation of the Other Areas (as described in the response to Comment IC) may not be the first step in the MILCON site studies because of time constraints.

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.

RESPONSE:

As described in the response to Comment IC, the Navy will perform a comprehensive investigation of HPA. Field investigations will be performed at sites that are found to be contaminated. For Other Areas not found to be contaminated, sufficient justification for excluding them from further investigation will be provided to the regulatory agencies in the form of a summary report.

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.

RESPONSE:

It is the Navy's understanding that the descriptions of the planning documents, which will be submitted to the agencies separately at a future date, are unnecessary for the Document, therefore, Section 3.1, Planning Documents, has been deleted from the Document. Please note that as a result of deleting this section, all subsequent section numbers for Section 3 are changed. The section numbers in the remainder of this response refer to those in the original draft document.

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.**

RESPONSE:

The statement in question has been removed. The Navy's approach to the Other Areas is described in response to Comment IC.

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 ground-water 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 ground-water contamination at Hunters Point Annex.**

RESPONSE:

The Navy will collect ground-water samples at all sites where borings or wells are installed; the Document has been revised to reflect this.

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.**

RESPONSE:

The Navy agrees with the DHS comment in general. However, although soil samples may be collected at the stated intervals for lithologic description, all such soil samples may not be submitted for chemical analysis. The analytical program is site specific and is described, along with the rationale, in the site-specific sampling plans.

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.**

RESPONSE:

Monitoring subsurface soils for radioactivity will be performed in addition to surface surveys. The scope of activities for radioactivity monitoring will be submitted to the agencies as a separate submittal describing the proposed reconnaissance activities (in preparation). This document will describe the criteria used to determine at which sites monitoring will be performed, including how the sampling grid will be established, the depths at which monitoring will be performed, and the types of instrumentation

that will be used. The plan for monitoring radioactivity at HPA will be developed and implemented under the supervision of a certified industrial hygienist and with consultation with the DHS industrial hygienist.

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 those activities will be conducted.**

RESPONSE:

The Navy intends to install and sample a number of monitoring wells as described in the site-specific sampling plans. Aquifer tests will also be performed, as warranted. Appropriate revisions have been made to the Document to clarify the Navy's intentions.

Note: The following DHS comments on Sections 3.2.1 to 3.2.11 (formerly 3.3.1 to 3.3.11) request the Navy slightly modify the scope of the field investigation at a number of IR sites. The Navy has revised Sections 3.2.1 to 3.2.11 of the Document, as requested by the DHS. However, the Navy wishes to clarify that these sections describe the preliminary scope for the proposed field investigations. The final scope of field investigation for each IR site will be presented in the sampling plans and will supersede the preliminary scopes presented in the Scoping Document.

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.**

RESPONSE:

Subsurface soils will be scanned for beta and gamma radiation during drilling and trenching in areas where radioactivity is suspected.

2. **A minimum of three deep monitoring wells should be completed in a deeper permeable unit.**

RESPONSE:

The Navy will install at least three deep monitoring wells.

SECTION 3.3.2, BAY FILL AREA, IR-2

1. **At least ten shallow and three deep monitoring wells should be installed.**

RESPONSE:

The Navy will install at least ten shallow and three deep monitoring wells.

2. **Soil samples should be collected from the borings at intervals no greater than 5 feet.**

RESPONSE:

The Navy will collect soil samples throughout the fill at intervals of 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.

RESPONSE:

No revisions to the Document are necessary in response to this comment.

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.**

RESPONSE:

Reference to STLC and TTLC values have been deleted from the Document.

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.**

RESPONSE:

The Navy will install at least 10 soil borings to depths between 10 and 15 feet. Soil sampling frequency will be consistent with those noted in the comment.

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

RESPONSE:

The Navy will install at least one deep monitoring well.

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.

RESPONSE:

The Navy will install at least one deep monitoring well.

SECTION 3.3.6, TANK FARM, IR-6

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

RESPONSE:

The Navy will install at least one deep monitoring well at this site.

2. **Soil samples should be collected from the unsaturated zone at no greater than 5-foot intervals.**

RESPONSE:

The Navy will collect soil samples in shallow borings at intervals no greater than 5 feet.

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.**

RESPONSE:

The Navy will install at least five shallow and three deep monitoring wells.

SECTION 3.3.8, PCB SPILL AREA, IR-8

1. **Additional soil samples from the borings should be taken at 2.5 feet depth.**

RESPONSE:

The Navy will collect additional soil samples at a depth of 2.5 feet except within the limits of the excavation.

2. **One deep monitoring well should be installed for hydrogeologic assessment. Additional shallow wells should be drilled to replace those destroyed by construction.**

RESPONSE:

The Navy will install at least one deep monitoring well and additional shallow monitoring wells to replace those wells destroyed by construction. However, these replacement wells may not be located exactly adjacent to the destroyed wells, depending upon access and 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.

RESPONSE:

The Navy will install at least four shallow and two deep monitoring wells.

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.

RESPONSE:

The Navy will install at least three shallow and one deep monitoring wells.

SECTION 3.3.11, POWER PLANT, IR-11

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

RESPONSE:

The Navy will install at least one deep monitoring well.

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".

RESPONSE:

The phrase referred to in the comment has been deleted. The document has been revised to include additional information about Triple A Site 8.

SECTION 3.3.13, OTHER AREAS

- 1. In both Study Areas A and B, additional shallow and deep monitoring wells should be established downgradient of known contamination sources. Also, additional soil samples should be collected in these areas to determine the full nature and extent of any contamination.**

RESPONSE

These areas will be addressed in the evaluation of the Other Areas as described in the response to Comment IC.

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.

RESPONSE:

The Navy will perform a comprehensive investigation of HPA, as described in the response to Comment IC. In addition, the Navy will develop a plan for performing ground-water monitoring. This plan will address the need for wells in addition to those proposed in the sampling plans. The plan will be submitted to the agencies for comment.

**NAVY RESPONSE TO REGIONAL WATER QUALITY CONTROL BOARD
COMMENTS ON HUNTER POINT SCOPING DOCUMENT**

The Regional Water Quality Control Board (RWQCB) comments (dated January 29, 1988, and sent to the Navy on February 10, 1988) have been reproduced below (in boldface type) with the Navy's response presented below each RWQCB comment.

We have reviewed the Draft Scoping Document for the Remedial Investigation/Feasibility Studies at the Naval Station, Treasure Island, Hunters Point Annex, prepared by Harding Lawson Associates. We have also reviewed Preliminary Comments on Hunters Point Scoping Document prepared by staff of the Department of Health Services. These comments provide a good base for additional comments from the Regional Board staff, as we have no objections to the Department's assessment of the subject document.

RESPONSE:

No revisions necessary to the Document based on this comment.

In general, we believe that all sites where contaminants have been found at levels exceeding background levels should be studied to ascertain if these contaminants threaten beneficial uses of the surface or ground waters. This applies to known sites and those sites for which initial investigations are contemplated. Thus, we consider action levels for further study to be "natural background" for all Triple A sites, underground tank sites, MILCON sites, bay sediments, Study Area A and B, surface inventory sites, and the previously identified "IR" sites. Some examples at "IR" sites include the old transformer yard and the Building 503 site where it is appropriate for surface soils to be analyzed for PCB contamination to background levels, in this case the limits of detection. The basis for requiring remedial action on any site will be cost-effectiveness, technical feasibility, and risk assessments.

RESPONSE:

No revisions necessary to the Document. The Navy's program is described in the individual sampling plans and in the response to DHS Comment IC.

Of special concern in the subject document is the use of previous information developed by EMCON in their 1987 Confirmation Study, Verification Step. This document contained a reference to "Regulatory Criteria" supposedly stating action levels for cleanup acceptable to the Regional Board. This information was reproduced as Table 3 of Appendix A of the subject document. The information is neither technically correct nor relevant to the protection of beneficial uses of the waters of San Francisco Bay. I have already discussed this matter with Harding Lawson representatives and they have agreed with my assessment of the matter. I am requesting that the subject document delete Appendix A-Table 3, Appendix B-Table 2, and references to Appendix A-Table 3 contained on page 37-first paragraph and page 73-second paragraph. I am also requesting that Appendix E, Tables 3 and 5 be modified to omit the incomplete reference to "Regulatory Standards" as these only relate to hazardous waste designations and not to the protection of beneficial uses.

RESPONSE:

The following items have been either deleted or modified as requested by the RWQCB:

- o Appendix A, Table 3 - deleted
- o Appendix B, Table 2 - deleted
- o Reference to Appendix A - Table 3 on page 37 - deleted
- o Reference to Appendix A - Table 3 on page 73 - deleted
- o Tables 3, 4, and 5 of Appendix E - modified to omit the term "Regulatory Standards".

These appendices have not been resubmitted in this draft but will be reproduced for the final Document.

We believe a thorough review is necessary of any previously completed sediment studies (i.e., EIS, dredging, etc.) in areas off-shore, especially adjacent to the bay fill area, the industrial landfill, the oil reclamation ponds, and the pickling and plate yard. These and additional off-shore areas should be sampled to determine the lateral and vertical extent of

contamination above background levels in the sediments. Additionally, benthic studies should be proposed to determine the impact of this pollution on beneficial uses.

RESPONSE:

The Navy intends to collect surface soil samples in the intertidal zone adjacent to the Industrial Landfill, Bayfill Area, and Oil Reclamation Ponds. The Pickling and Plate Yard is located near the center of the facility away from the shoreline, therefore an intertidal zone is not present.

The need for benthic studies will be addressed once the data from the intertidal zone samples are evaluated.

Monitoring wells proposed for water bearing zones should be designed to be screened and clustered in such a manner as to give a true vertical picture of the water quality conditions in the aquifer. This is especially important in water bearing zones greater than 20 feet thick.

RESPONSE:

This comment was discussed with Mr. Lester Feldman of the RWQCB in a teleconference on February 17, 1988. In the teleconference, Mr. Feldman indicated that this comment is intended as guidance only and does not require the Document be revised. The design and construction of monitoring wells will be discussed in the Quality Assurance Project Plan and appropriate sampling plans. Specific construction details will depend upon field conditions; additional relevant information will be obtained from the planned reconnaissance work (i.e., more detailed information on the subsurface stratigraphy).

ENCLOSURE (2)

REVISED SCOPING DOCUMENT REMEDIAL
INVESTIGATIONS/FEASIBILITY STUDIES
VOLUME I

DATED 03 MARCH 1988

IS ENTERED IN THE DATABASE AND FILED AT
ADMINISTRATIVE RECORD NO. N00217.000230

ENCLOSURE (3)

ERRATA SHEET
WORK PLAN/SCOPING DOCUMENT REMEDIAL
INVESTIGATIONS/FEASIBILITY STUDIES
VOLUME II

DATED 03 MARCH 1988

IS ENTERED IN THE DATABASE AND FILED AT
ADMINISTRATIVE RECORD NO. N00217.000232