



# California Regional Water Quality Control Board

## San Francisco Bay Region



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Commanding Officer  
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Naval Facilities Engineering Command  
Southwest Division  
1220 Pacific Highway  
San Diego, CA 92132-5190  
Attention: Mr. Richard Mach

June 14, 2001  
File 2169.6032 (LBJ)

**Subject: Comments on Draft Petroleum Hydrocarbon Corrective Action Plan, Parcels C, D, and E, Hunters Point Shipyard, San Francisco, CA.**

Dear Mr. Mach:

Regional Board staff have reviewed the document titled *Draft Petroleum Hydrocarbon Corrective Action Plan, Parcels C, D, and E, Hunters Point Shipyard, San Francisco, CA*, dated March 28, 2001 (CAP). In general, the document adequately addresses many of the concerns of the Regional Board as related to petroleum cleanup at for Parcels C, D, and E. However, we have identified the following concerns with the CAP:

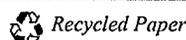
### Overall Concerns

- The proposed industrial cleanup goals are not consistent with the goals agreed upon by Regional Board staff and the Navy for Parcel B. We do not concur with the Navy's proposed industrial cleanup goals.
- We refer the Navy to the risk assessment conducted for the Presidio of San Francisco for a robust evaluation of petroleum related human health concerns for construction workers. To this end, we recommend that the Navy adopt cleanup goals that are protective of construction workers for both residential and industrial areas.
- Better justification should be provided in terms of cost effectiveness/mass removal efficiency for those locations where source material levels are exceeded near structures and under the water table. It is not appropriate to assume that remediation is not required just because a soil sample was collected in the saturated zone.
- The Navy should distinguish remedy selections between monitored natural attenuation and natural recovery. Corrective action plans are necessary for those locations where monitored natural attenuation is to be implemented.
- Several petroleum release sites that are of concern to the Regional Board were not addressed in the CAP. In particular, it does not appear that sites with sample results for extractable and purgeable hydrocarbons were included in this assessment.

### Section 3.2.1 Soil Remediation Criteria

The Navy's proposed value of 3,500 mg/kg total petroleum hydrocarbons (TPH) as the "source material level" is acceptable. The proposed goal of 14,000 mg/kg TPH for industrial areas is not

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acceptable. Based on a risk assessment for the Presidio of San Francisco and the petroleum strategy agreed upon by the Navy for the former Alameda Naval Air Station, we believe that a total TPH concentration of approximately 3,500 is considered to be health protective for a construction worker. For deeper soils in industrial areas, we recommend that the remediation goal should be performance-based and specify that all mobile separate phase hydrocarbons will be recovered. Please revise the CAP to include cleanup goals that are acceptable to the Regional Board.

We do not agree with the concept that soil with high concentrations of TPH will be left in place when located below the water table or under structures if in-situ technologies are capable of cost-effective remediation. Rather, if the source material level is exceeded below the water table, it is appropriate for the Navy to qualitatively evaluate the potential recoverable mass of oily phase petroleum that may be present and remediate it as appropriate. Please revise the report to better identify the data and criteria needed to justify leaving soils in place with elevated concentrations of petroleum.

#### **4.5.1 Total Petroleum Hydrocarbon Contamination in Soil**

Samples PA30SS09, PA30B012, PA30B014 PA30FV02, PA39B003, PA49TA05, PA50CB301, PA58SW06, PA50CB302, PA28SW01, PA28SW66, PA50SW309, PA50SW308, PA29SW21, PA28SW22, PA58SS08, PA58SS05, PA58SS01 were all noted to exceed the proposed cleanup goals for petroleum. We could not identify any reference to these samples in the CAP. We understand that some of these samples were collected from floor vaults, sumps, and storm drains, however, these areas must be adequately addressed before we will concur that no further action is warranted at these sites. Please explain why these sample locations do or do not require further action.

The sum of total petroleum hydrocarbons in samples from sites IR04, IR13, and IR76 appear to exceed the proposed cleanup goals for petroleum. Please explain why these sites were not addressed in the CAP and ensure that any site where the sum of extractable and purgeable hydrocarbons exceeds the cleanup goals has been identified as requiring further action.

Additionally, several other areas were noted to contain highly elevated concentrations of total oil and grease (TOG). While we would not advocate remediation based solely on TOG results due to the potential for positive analytical interferences, these highly elevated results do warrant discussion in the CAP, inspection for nuisance conditions, and possible free product investigations. Please ensure that any site where TOG results exceed 14,000 mg/kg has been assessed for potential free product and nuisance conditions.

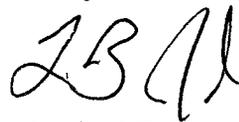
Page 5-45 of the Environmental Baseline Survey states, "there may be four USTs associated with Building 815.... The IRP will investigate if there is contamination associated with these USTs during the Parcel E RI field effort". Please provide documentation regarding the disposition of these USTs and the results of any investigations.

**6.0 Evaluation of Remedial Alternatives**

Please expand Table 6-3 to provide a brief justification for the selected alternative including unique site conditions (e.g., contamination under a building) and compliance with the Regional Board guidance for low-risk fuel release sites. We believe that further investigation (as opposed to continued monitoring) should be included as an option for some sites, including IR56 and IR73.

Should you have any questions, please contact me at (510)-622-2400.

Sincerely,



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