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HUNTERS POINT
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STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704



November 16, 1988

Commanding Officer
Naval Station Treasure Island
Building 1 (Code 70)
San Francisco, CA 94130-5000
ATTN: Mr. Kam Tung

DHS COMMENTS ON REVISED GROUP III SITES SAMPLING PLAN

Dear Mr. Tung:

Enclosed are our comments on the revised Group III sites sampling plan for Hunters Point Annex. Most of our comments have been adequately addressed in this revision, so you may proceed with the initial RI work on these sites. However, a few areas have not been addressed to our satisfaction, and you will need to update these areas before you may proceed with their implementation. These sections are covered in our comments.

Please revise this sampling plan and submit the final revision by December 16, 1988.

If you have any further questions, please contact William Owen of my staff at (415) 540-2592.

Sincerely,

Howard Hatayama, Chief
Site Mitigation Unit
Region 2
Toxic Substances Control
Division

Enclosure

cc: attached list

HH:wo

D/N 42

MAILING LIST - HUNTERS POINT

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COMMENTS ON PROPOSED REVISIONS TO GROUP III SAMPLING PLAN
DATED SEPTEMBER 16, 1988

1. Response I.B. The Navy is correct when it points out that the preliminary PHEE cannot be practically incorporated into each work plan. However, it is possible to provide a concise summary of the conceptual model used in the PHEE, and direct the reader to the PHEE for more information. These elements should be incorporated into the work plans.
2. Response II.A.1. It is the Department's opinion that the approach to characterizing Hunters Point does not constitute a phased study. The Navy has made a tentative step in the right direction by adding a reconnaissance study. However, the contingency sampling amounts to only a small fraction of the total samples planned for the RI. Given the large amount of work scheduled for this facility, one way to phase the RI would be to execute the present work plan in several steps, and wait for the initial results before starting subsequent activities. We feel this is a prudent approach that may reduce the possibility of redundancy, and will only require minor revisions to the work plan. Such a revision has already been proposed for the Group II Sites Sampling Plan ("Responses to Department of Health Services Comments on Revised Group II Sampling Plan", October 25, 1988), and would also be acceptable for this workplan.
3. Comment II.D.5. The Navy's proposal to eliminate groundwater sampling from test borings is acceptable. However, our comments were not intended to eliminate these samples. We have no objections to the initial approach, but we do require a description of the sampling techniques and analyses before we can approve their use.
4. Response II.D.8. It is appropriate, given the Navy's arguments, to evaluate Triple A Site 3 as described. As usual, the results of the PA/SI should be sent to the Department. No revision to the work plan is necessary.