



California Regional Water Quality Control Board

San Francisco Bay Region



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Arnold Schwarzenegger
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HUNTERS POINT
SSIC NO. 5090.3.A

Date: **APR 07 2004**
File No. 2169.6032 (JDP)
PCA No.: 16525

Mr. Keith Forman
BRAC Environmental Coordinator
Naval Facilities Engineering Command
Southwest Division
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8517

Subject: Staff Comments on 1) Draft Action Memorandum Time Critical Removal Action for Parcel D Soil Excavation Sites, February 24, 2004, Hunters Point Shipyard, San Francisco, California, and 2) Draft Work Plan Time-Critical Removal Action for Parcel D Excavation Sites, February 24, 2004, Hunters Point Shipyard, San Francisco, California.

Dear Mr. Forman:

Regional Water Quality Control Board (RWQCB) staff has reviewed the above-referenced documents and have provided the attached comments.

I look forward to discussing these recommendations with you at your convenience. If you have questions, please contact me by telephone at (510) 622-2492 or by electronic mail at jdp@rb2.swrcb.ca.gov.

Sincerely,

James D. Ponton, R.G.
Project Manager

Attachment 1: Comments

cc:

Marie Avery
Department of the Navy
Southwest Division/Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92131-5190
G. Patrick Brooks, Lead RPM

Preserving, enhancing, and restoring the San Francisco Bay Area's waters for over 50 years

**Regional Board Staff Comments on
Action Memorandum Time-Critical Removal Action for the Parcel D Soil Excavation Sites,
February 24, 2004
Hunter's Point Shipyard, San Francisco, CA**

Specific Comments

1. Section I, page 1: The document states that "soil containing TPH that is collected with CERCLA COCs will also be removed in this CERCLA action, as discussed in the Parcel D TPH Corrective Action Plan (CAP) (TetraTech 2002a)."
 - a. Please amend the text to note that the Parcel D CAP retains a revised draft status and the CAP has not yet been approved by Water Board staff.
 - b. Please amend the text to note that the Navy and Water Board staff has revised the TPH clean-up criteria that will be incorporated into a revised TPH CAP that will be prepared in 2004.

2. Section I, page 1: The document states "soil that contains COCs that may affect groundwater quality at Parcel D will be removed." Please provide some additional details on the criteria the Navy will use in evaluating what concentration of COCs in soil should be removed (or should remain) to be protective of groundwater quality in Parcel D. Note that the Board is particularly concerned with the protection of aquatic receptors within this area of the San Francisco Bay.

3. Section II, A.1, page 3: The document states that soil containing hexavalent chromium (Cr IV) will be removed "...based upon results for pre-excavation confirmation sampling to reduce potential contamination to groundwater from the soil."
 - a. As requested above, (Comment No. 2), please provide additional details on the criteria the Navy will use in evaluating what concentration of COCs in soil should be removed in order to be protective of groundwater.
 - b. Please describe how the locations for confirmation sampling will be selected.
 - c. Please explain how the potential impact to groundwater will be monitored both before and after completing the proposed soil excavation.

4. Section II, A.4, page 5: The report states that "For aquatic receptors in San Francisco Bay, concentrations of Cr VI in soil at remediation area 9-1 present a potential risk because Cr VI could be affecting groundwater quality. Soil that contains Cr IV could leach to groundwater, causing concentrations of Cr IV in groundwater to exceed the HGAL-adjusted aquatic criterion." As requested above, please expand on the criteria that will be used in evaluating the concentration of Cr IV in soil that is protective of groundwater and aquatic receptors.

5. Section V, A.1, page 10: The report states that confirmation samples from excavation less than seven (7) feet in depth will be collected only from sidewalls and not from the bottom of

the excavation. Water Board staff requests that confirmation soil samples be collected at the bottoms of all excavations, regardless of depth.

6. Table B-2, Proposed Cleanup Goals, page B-2: Table B-2 shows that the residential cleanup goal for total TPH (TTPH) is 3,500 mg/kg and cites the "Revised Draft Parcels C, D, and E Petroleum Hydrocarbon CAP," dated November 22, 2002. As stated in Comment No. 1, the recently agreed upon TTPH screening levels should be cited.
7. General Comment: The Action Memo does not describe/include the removal of soil stockpiles. However, the Parcel D TCRA Work Plan lists stockpiles to be removed. Please review and revise the Action Memo as appropriate to include the rationale/criteria for, and description of soil stockpile removal.

**Regional Board staff comments on the
"Draft Work Plan Time-Critical Removal Action for Parcel D Excavation Sites,
February 24, 2004,
Hunters Point Shipyard, San Francisco, California**

Specific Comments

8. Table 1, Cleanup Goals, page 4: Please revise the Residential Soil Cleanup Goals as requested in comments Nos. 1 and 6.
9. Section 1.1.1, Scope of Work: Given that excavation dewatering is identified as part of the field work conducted during the TCRA, Water Board staff suggests:
 - a. As appropriate, noting/posting the depth to groundwater (where known) on the figures and tables for each IR site covered by this TCRA
 - b. Adding an arrow that depicts the generalized/expected groundwater flow direction at each excavation IR site in support of the potential source area description provided for each IR site.
10. Section 2.1, IR-08: The TCRA text identifies Building 606 and nearby utilities as potential sources for the PAHs detected in soil. The Environmental Clean-up Sites, Hunters Point Shipyard (summary sheet dated September 18, 2003) assigns the source areas identified in Parcel D IR-08, to the Building 503 PCB spill Area.
 - a. Please explain why Building 606 is considered a potential source of PAHs.
 - b. Please add Building 606 to the Environmental Cleanup Sites summary sheet.
11. Section 2.2.1, page 10, Excavation 9-1: The document states that the Navy will collect additional soil samples around piezometer IR09PPY1 to delineate the excavation area. As mentioned in previous comments on the Action Memorandum, please provide additional

detail on how the extent of Cr.IV (i.e., with the potential to impact groundwater at levels above the HGAL) will be delineated.

12. Section 2.2.1, Excavation 9-1: – Water Board staff has noted that the A-aquifer groundwater flow direction (as depicted on February 20, 2002) is directed to the southeast, at Building 422 (location of excavation 9-1). The TCRA text (page 10) identifies the pickling tank secondary containment vault as the potential source of Cr IV to groundwater in that area. Given that the secondary containment vault is located downgradient of the excavation 9-1 and piezometer IR09PPY1, please explain how the secondary containment vault is the source of the reported detection of Cr IV in groundwater.
13. Section 2.3, IR-17, page 15: The document states that location B29G01 contained TPH at a concentration of 30,550 mg/kg. However, Figure 6 (which is the drawing of the proposed excavation at IR-17) does not show the location of boring B29G01, nor does the figure post the analytic results for the B29G01 location.
 - a. Please amend Figure 6 (i.e., include the location of boring B29G01 and results from B29G01) so that it matches the text in Section 2.3.
 - b. Staff requests that the Navy obtain a groundwater sample from a location close to boring B29G01 in order to evaluate whether TPH has impacted groundwater.
14. Section 2.3, IR-17, page 15: The document states that “recoverable free product was not present in groundwater, as confirmed by a sample from a piezometer located near B29GB01.”
 - a. Please state the distance between B29GB01 and the piezometer.
 - b. Please identify the piezometer to which the sample refers.
 - c. Please provide details on how the Navy proposes to handle/manage free product, should free product be found in the excavation.
15. Section 2.3, IR-17, page 15: Previous boring A29GB01, which contains 16,400 mg/kg TPH, is located at the edge of the proposed excavation. It is unlikely that the concentration will decrease to less than 3,500 mg/kg within less than 1 foot. Staff requests that the Navy evaluate how the TPH Soil Cleanup Goal (3,500 mg/kg) will be met at IR-17 given the location of the boring relative to the excavation footprint.
16. Section 2.6, IR-34, page 20: Previous boring IR34B023 (contains 6,500 mg/kg TPH) is located at the edge of the proposed excavation (which is near a rail line). It is unlikely that the concentration will decrease to less than 3,500 mg/kg within the short distance depicted on Figure 9 and it may be necessary to return to this location to remove soil to meet the TPH soil cleanup goal. Please explain how the TPH cleanup goal of 3,500 mg/kg will be met at DM8258.
17. Section 2.7.2, Excavation DM93636, page 24: Figure 11 indicates that total TPH was detected in boring IR35B025 at 3,200 mg/kg, very close to the TPH soil cleanup goal of 3,500 mg/kg. However, confirmation samples analyses are listed only for PCBs. Given that

TPH was detected so close to the TPH soil cleanup goal, Water Board staff requests that TPH analyses be added to the proposed confirmation sample analytic suite.

18. Section 2.8, IR-37, page 24: This section of the report compares soil sample results with residential PRGs. Please revise this section to reflect the newly agreed-upon unrestricted residential TPH soil cleanup goals, as appropriate.
19. Section 2.13, IR-68, page 35: This section states that “a sample from location IR68 B005 contained TPH at a concentration of 51,000 mg/kg,” at a depth between 0 and 0.25 feet. However, this section of the report does not indicate whether a groundwater sample was collected in this area, and whether free product is present. Please describe how the Navy plans to determine whether TPH has impacted groundwater and/or whether free product is present at this location.
20. Appendix D, Attachment 2, Sampling and Analysis Plan, Section 2.2.8, Management of Groundwater in Excavations, page 31: This section of the Work Plan describes how groundwater in excavations will be managed. This section does not describe what actions will be taken in the event free product is encountered in an excavation. Please include a description of how free product will be managed if it is encountered in an excavation.
21. Appendix D, Attachment 2, Sampling and Analysis Plan, Section 2.1.1, Characterization Sampling at Site 9-1, page 19: Water Board staff is pleased to read about the sampling activities (i.e., soil borings to 20 ft depth, sediment and standing water sample from inside secondary containment vault at IR-09) that are planned to further characterize the nature and extent of Cr VI at IR-09. Along those lines, and to further complete the picture:
 - a. Board staff requests that grab groundwater samples be collected from a select group of borings to define the extent of CR IV in groundwater.
 - b. Based on the analytic results of the grab groundwater sampling, Board staff recommends that A-zone monitoring wells be installed in positions to adequately monitor and track the plume.