



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

September 18, 1989

Commander, Western Division
Naval Facilities Engineering Command
ATTN: Louise Lew, Code 1811
PO Box 727
San Bruno, CA 94066-0720

Dear Ms. Lew:

The following are EPA's comments on the Technical Report: Underground Tank Investigation, Naval Station Treasure Island, Hunters Point Annex, submitted for our review August 21.

Please note that we do not have a copy of the 4-volume Project Plan, which includes the Sampling Plan cited frequently in the Technical Report. Although a set is being made available to us by your office, we will not have it in time to review it prior to submitting comments by your requested due date of September 20. Consequently, it may be that some of our comments are already addressed in the Project Plan.

General Comments

1) EPA believes the efforts being undertaken with regard to the underground tanks should be incorporated into the larger Hunters Point RI/FS currently underway pursuant to the Department of Health Services' Remedial Action Order and the Navy's IR program. Contaminants at some of the tank sites are also found at several of the "IR sites," and in at least one case (Building 435 and the Pickling and Plating Yard), the sites and their contaminants may physically overlap.

In addition, the RI/FS will have to consider cumulative potential health and environmental effects of all areas of contamination at Hunters Point. Consequently, the results of the Underground Tanks investigation will have to be folded into the RI/FS. We believe that having one RI/FS process governing the site investigation and clean-up efforts would make this necessary coordination of data and activities easier.

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2) Based on the information presented, we agree that the plan presented in the "Recommendations" section represents the "minimum quantity" of borings, wells, and samples needed, as stated on page 6-1. We assume the releases may have occurred over a number of years and that the contamination may be widespread. Therefore, a full characterization may require further site investigation.

3) The sampling plan that is proposed is not adequately documented. Additional information should be provided in the report to justify the number and locations of wells, boring, and sampling points, as well as the number and depth of samples.

4) A proposed schedule for future investigation activities should be included.

Specific Comments

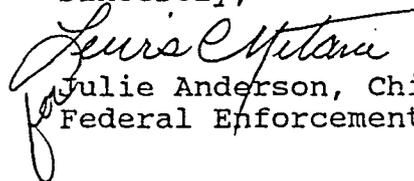
5) The last sentence on page 6-2 concerning screening of the wells seems to conflict with statements made further on in the section (e.g., in 6.3.4, page 6-6; 6.3.5, page 6-7; and 6.3.7, page 6-8). The screening plans for all wells should be clearly and consistently explained.

6) In the discussion in 6.3.7, page 6-8, consideration should be given to whether the proposed activities at Building 435 (and possibly Building 304) will affect, or be affected by, removal and remedial activities to be conducted at the Pickling and Plating Yard.

6) The recurring statement "should contamination be extensive" (e.g., page 6-1) should be clarified. How are you defining "extensive contamination"?

Should you have any questions concerning these comments, please contact Chuck Flippo at (415) 974-8638.

Sincerely,


Julie Anderson, Chief
Federal Enforcement Section

cc: Chein Kao, Department of Health Services
Steve Ritchie, Regional Water Quality Control Board