



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, CA 94105

January 24, 1990

Commanding Officer  
Naval Station Treasure Island  
ATTN: Kam Tung, Hunters Point Annex  
Building I (Code 70)  
San Francisco, CA 94130-5000

Dear Mr. Tung:

Enclosed are EPA's comments on the **Preliminary Assessment Report for Sites PA-12 through PA-18, and the Site Inspection Workplan for Sites PA-13 and PA-15 through -18** at Hunters Point Annex (HPA). We thank the Navy for cooperating with our request for additional time to complete our review.

We agree with the plan to include Sites PA-12 and PA-14 in the RI for IR-2 and IR-11 respectively. With regard to the remaining sites, as our first comment in the enclosure indicates, it is unclear why an RI is not proposed for certain of these other sites. Certainly, site PA-15 would seem to be a strong candidate based on existing information. In addition, the PCB data on sites PA-13 and PA-17 are of concern.

The **SI Workplan** is unclear as to what criteria the Navy would use to determine whether an RI would be proposed for these five sites, other than to state that SI data "may be used, if necessary, to develop a Hazard Ranking System (HRS) score for each site" (page 2). We read the statement to mean that some decision-making criteria which are not identified in the Workplan, will be used to determine whether to proceed with an RI for these five sites (or whether to include them in one of the RIs already planned for the IR sites). If a decision based on those undefined criteria cannot be made, an HRS score will be calculated and used.

EPA strongly believes that the proposal to use an HRS score to determine the need for an RI is inappropriate. The purpose of HRS scoring is to determine whether a facility should be included on EPA's National Priorities List. Once a facility is on the NPL, as is HPA, it is not acceptable to use the HRS to micromanage individual sites within the facility.

As noted, it is unclear what criteria (if any) other than an HRS score are being considered for use in deciding whether to include these additional five sites in the RI/FS process. Given the situation at HPA, we believe it may be difficult to handle any of these sites as a separate and distinct unit. That is, handling

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these sites separately from adjacent or nearby IR sites may unnecessarily complicate both the assessment of overall site risk and their contribution to "downstream" contamination.

Given this, we believe the best approach may be to include in the RI/FS process any sites at which contaminants have been found above the background level, or above detection limits if background levels are unknown. We believe the available data for sites PA-13, -15, and -17 already support the need for an RI. This could be done by including them in the RIs for IR-2, -11, and -2, respectively. In this case, the proposed **SI Workplan** could be modified to become a "Phase I" RI sampling plan to be appended to the existing sampling plans for the IR sites.

Available information on PA-16 and -18 are less clear. At these two sites, the additional information to be gathered in the SI could be useful in determining whether to include them in the RI/FS process. Either the criterion mentioned above ("above background" or "above detection limit"), or acceptable alternative decision-making criteria *other than use of the HRS model*, should be described in a revised **SI Workplan**.

In addition to the enclosed comments, I would like to note:

1) In the **SI Workplan**, Table 3 in the "Tables" section, and Table 15 in Appendix B, cite PCB data in "ppm". In the **PA Report**, however, the same levels are cited in "ppb" (Tables 4 and 11). We assume the **PA Report** tables should cite "ppm."

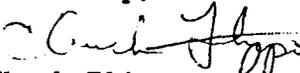
2) For site PA-15, what analytical method(s) will be used for dioxin analysis? This should be stated in the **SI Workplan**.

3) In the **SI Workplan**, Appendix B, Table 14, which sites are those referred to here as #4 and #7? If these are PA sites addressed in this workplan, please cross reference them to the text. If they are not, why is this data included in the workplan?

4) In the **PA Report**, Table 8 should include the results of metals analyses from the monitoring well samples.

Please submit a revised workplan addressing the above comments as well as those in the enclosure. If you have questions or wish to discuss these comments further, please don't hesitate to call me at (415) 865-7630.

Sincerely,

  
Chuck Flippo  
Federal Enforcement Section

cc: ✓ Louise Lew, WESDIY  
Mark Malinowsky, DHS  
Scott Lutz, BAAQMD

Comments on the Site Inspection Work Plan for Sites PA-13, PA-15, PA-16,  
PA-17, and PA-18 Naval Station, Treasure Island Hunters Point Annex

In general the report was complete and well organized and for the most part consistent with findings and recommendations presented in the *Preliminary Assessment* (HLA, November, 1989). There are a few areas however, where more detail is required or where rationale is unclear. These areas are discussed in the following comments:

[1] General: It is not clear in this *Site Inspection Work Plan* or in the *Preliminary Assessment* why certain sites (PA-12 and PA-14) were selected for inclusion in the Remedial Investigations (RIs) planned at other sites being addressed as part of the Navy Installation Restoration (IR) program, while other sites (namely PA-15), where evidence of contamination appears to be just as great, were not automatically selected for inclusion in ongoing RIs. More clarification is required.

[2] Pg 2, P2: "Conditions observed at each site indicate that air should not be a significant migration pathway if the site remains undisturbed. Therefore, no additional investigation of the air route is proposed for the SI at this time."

This paragraph and other such statements presented in the *Work Plan* and *Preliminary Assessment* are not well substantiated. The reason for such assumptions needs to be stated. If the site is paved indicate so, if the site is unpaved, how is HLA sure that air dispersion in dry summer months is not of concern? Clearly state the bases for this statement.

[3] Pg. 8, P1: "Recommendations for investigation of the deeper aquifers, if necessary, will be based on the results of the shallow aquifer investigation."

What conditions in the shallow aquifer would necessitate investigation of deeper aquifers?

[4] Pg.9, P4: This paragraph indicates that soil samples will be collected continuously to the total depth of the boring. Will all of these samples be submitted to the laboratory for potential analysis, or only the 0-0.5 sample and the sample from the interval exhibiting the greatest field indications of contamination, or the sample from midway between the ground surface and the water table?

[5] Pg. 9, P4: The proposed analytical plan calls for analysis of the 0-0.5 foot sample for priority pollutant semivolatile and volatile organic

compounds, CLP metals, PCBs, pesticides, hexavalent chromium, cyanide and priority pollutant volatile organic compounds.

It is likely that much of the volatile and semivolatile organic compounds that may have been present in the shallow surface soil (i.e., 0-6 inches) would have volatilized or otherwise been degraded due to heating from sunshine and weathering. This is especially true if the area of investigation is unpaved. A slightly deeper sample, possibly collected at a depth of 0.5 -1.0 feet would provide more accurate indication of the potential presence of volatile and semivolatile organic compounds.

- [6] Pg. 9, P4: This paragraph briefly mentions that field screening will be used to select samples for laboratory analysis. The type of field screening proposed should be described in this report.
- [7] Pg. 10, P3: A general description of the rationale for the selection of sampling locations is presented in this paragraph. The *Work Plan* needs to be much more specific in describing why specific borings were located as they were. The reason for locating each boring in each area should be described. For example, in Area PA-13, Boring 6 is located in an area where surface staining is visible. If the boring placement was random, this should be indicated.
- [8] Pg. 10, P4: It is indicated that monitoring well locations at each site have been selected so that one well will be located in the expected upgradient direction from the site and the remaining two wells will be located in the downgradient direction. How were these well locations selected given the fact that local ground water flow direction can vary because of variations in topography, the hydraulic properties of subsurface fill materials and tidal fluctuations. How the expected gradient directions were determined should be indicated.
- [9] Pg. 11, P2: Why are pesticides part of the analytical program? Were they ever used or stored at the facility? What pesticides are being analyzed for?
- [10] Pg. 13, P1: and in general: "Elevated levels of copper, lead, and zinc were detected in soil samples from the sump excavation on the southwestern concrete slab."

This type of statement was used repeatedly throughout the *Work Plan* and the *Preliminary Assessment*. What does elevated mean in this context? What appears to be elevated may actually be the average metals concentration of the native soils. Until background levels are

established, avoid using this type of conditional statement. If this type of statement is used indicate the reasons for suspecting that metals concentrations are in fact abnormally high.

- [11] Pg. 14, P4: "The 1986 soil sample(s) contained PCBs at a concentration of at least 42 mg/kg and may have contained hazardous levels of copper." How is "hazardous" defined in this context? State the reason for this uncertainty regarding the presence of copper.
- [12] Table 4 of the Work Plan: Reported Evidence of Potential Contamination at Site PA-15 indicates that Tank S-505 drained into an open trench across the road. Is this "trench" the same as the oily waste ponds which were supposedly filled from tank S-505? It is not clear in the *Work Plan* if this trench is being investigated. Indicate what boring, if any, is located in this area.
- [13] Pg. 22, P4: This paragraph does not make clear who will be in charge of sample collection and handling.
- [14] Pg. 23, P3: The general sequence of field activities for each site indicates that the wells and borings will be surveyed prior to measurement of water levels and sampling of wells. Is there some reason why the wells cannot be sampled within 24 hours of development to avoid repurging of the required well volumes, and the survey conducted after all sampling activities are completed. This approach would save time by eliminating purging of the well and allowing the samples to get to the laboratory sooner.
- [15] Plate 3: It would be helpful if the location of samples collected by HLA in preparing the decontamination facility were shown on this figure.