



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

N00217.001279  
HUNTERS POINT  
SSIC NO. 5090.3

April 18, 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:

EPA has reviewed the final draft Site Inspection Work Plan for Site PA-15 and PA-18 at Hunters Point Annex. We have the following comment.

Comment #3 in the attachment to EPA's letter of January 24, 1990, commenting on the initial draft workplan, asked "What conditions in the shallow aquifer would necessitate investigation of deeper aquifers?" The response on page 3 of the "Navy Response to EPA Comments" (Appendix A), and the revision to the text on page 8 (cited in the comment response as #2, but actually #3), states that "contamination in the shallow aquifer would initiated a recommendation of investigation of the deeper aquifer." EPA remains concerned by the lack of clarity regarding the level of contamination and/or the hydrogeologic characteristics of the upper aquifer that would require investigation of the lower aquifer.

Before any decisions are made regarding further investigation of these sites beyond the scope of this SI, we would like to be clear as to what will be the basis for deciding whether the additional investigation will be conducted and, if it is to be conducted, the basis for deciding how it will be carried out (e.g., where wells and borings will be placed, to what depths they will be drilled, and where wells will be screened). We believe such a clarification is also needed for decisions concerning activation of contingency plans for the IR site remedial investigations.

I propose that we discuss this issue at the April 23 inter-agency (or TRC) meeting. If you wish to discuss these comments further, please call me at (415) 865-7630.

Sincerely,

Chuck Flippo  
Federal Enforcement Section

cc: Louise Lew, WESDI  
Mark Malinowski, DHS  
Charlie Noyes, RFOCB