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Ser 1811RP/00475

05 SEP 1990

Mr. Howard Hatayama
Department of Health Services
State of California
Toxic Substances Control Division
Region 2
700 Heinz Avenue, Bldg. F, Suite 200
Berkeley, CA 94710

Dear Mr. Hatayama:

In accordance with the Remedial Action Order (Docket No. HSA87/88-134RA) for Naval Station, Treasure Island, Hunters Point Annex, the following report is forwarded as enclosure (1):

Summary of August 15, 1990 Technical Review Committee (TRC) Meeting

Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Louise T. Lew, Code 1811, (415) 244-2551).

Sincerely,

MICHAEL A. MIGUEL
Head, Environmental Restoration Branch

Encl:

(1) Summary of August 15, 1990 TRC Meeting

Copy to:

Regional Water Quality Control Board (Attn: Steve Ritchie)
Bay Area Air Quality Management District (Attn: Scott Lutz)
U.S. Environmental Protection Agency (Attn: Chuck Flippo)
California Dept. of Fish & Game (Attn: Mike Rugg)
U.S. Fish & Wildlife Service (Attn: Steve Schwarzback)
National Oceanic & Atmospheric Administration (Attn: Chip Demarest)
Hunters Point Technical Review Committee Public Member (Attn: Rev. Arelious Walker)
City and County of San Francisco (Attn: David Wells)
San Francisco District Attorney (Attn: Steve Castleman)
Blind copy to: (w/o encl) 09C9, 202, 09A2A.20, 18A2, 181, 1811, 1811RP, 1811JC,
Harding Lawson Associates (Attn: Mary Lucas)
(w/ encl) Admin. Record, 1811RP, COMNAVBASE S.F., PWC S.F. BAY (Code 420)
COMNAVSEASYSCOM (Attn: Robert Milner), OIC Treasure Island, HPA
NAVSTA Treasure Island, PRC (Attn: Gary Welshans)
Writer: Rich Powell, 1811RP, x2554
Typist: B. Palmer, 4 Sept 90, TRC Mtg. File: HP/DOHS

N/D 175

Technical Review Committee Meeting
Hunters Point Annex
August 15, 1990

Agenda: See attached

Attendees: See Attached

Approval of Minutes of Last Bimonthly Agency Meeting:

No Comments were received regarding the minutes

Federal Facility Agreement/Technical Assistance Grant:

The Navy and regulatory agencies have reached conceptual agreement on the Federal Facility Agreement for Hunters Point Annex (HPA). The agreement is now undergoing final review.

The application for the Technical Assistance Grant for HPA is being revised.

Removal Action Status Report:

Asbestos. The asbestos removal action contractor was granted a two week extension; completion is scheduled by early September.

Pickling and Plate Yard. The Navy sent their recommended approach for revision of the air model and risk assessment report for the removal action at the Pickling and Plate Yard on July 20, 1990. No written responses have been received from the regulatory agencies. The EPA stated that they are still reviewing the approach. The BAAQMD said that they think the recommended approach accurately reflects the agreement that was reached regarding the revisions at the April TRC meeting. The emission assumptions used are acceptable. Aqua Terra Technologies also said that the approach has been discussed with Mr. Brian Bateman of the BAAQMD. The City and County of San Francisco would like to see an effort to avoid displacement of the commercial tenants and want assurance that the input assumptions to the model are not overly conservative. They will visit the site tomorrow with WESTDIV.

WESTDIV restated their request for written concurrence with the modeling approach from the regulatory agencies. It was also agreed to send an informal submittal of the modeling results to the BAAQMD prior to submittal of the final report.

Tank S505 and Tank Farm. WESTDIV anticipates submittal of the draft final removal action work plan for Tank S505 to the regulatory agencies by August 24, 1990. Submittal of the draft final work plan for the Tank Farm is planned by the end of August.

Sandblast Grit Fixation. Agency comments on the sampling plan for the treated and untreated sandblast grit have been received. The Navy will prepare a response to each comment received but the report will not be revised.

Technical Review Committee Meeting
Hunters Point Annex
August 15, 1990

WESTDIV stated that tributyl tin has been identified in the sandblast grit at an average concentration of approximately 50 parts per million. EPA's primary concern regarding the tributyl tin is whether it may be present in other areas where there is sandblast grit or whether there may be potential environmental effects from the tributyl tin. Tributyl tin is currently included in the environmental sampling and analysis plan but is not planned for the remedial investigations at the IR sites. The EPA stated that there is no standard method for the analysis of tributyl tin, therefore they will need to reach an agreement on the method that will be used.

RI Activities:

Reconnaissance Report. WESTDIV has received the preview copy of the *Reconnaissance Activities Report* from HLA and expects submittal of the draft report to the regulatory agencies by August 17, 1990.

IR-10 and IR-11 Groundwater Sampling. No comments have been received from the regulatory agencies regarding the Navy's response to agency comments on the reports of groundwater sampling for Sites IR-10 and IR-11. The second round of groundwater sampling at these sites is scheduled for August 22, 1990.

Status of Operable Unit II. The primary phase RI field work has been completed at each of the Operable Unit II sites. The chemical data is currently being loaded to the database system and validated.

Status of Operable Units I, III, and IV. PRC Environmental Management, Inc. (the Navy CLEAN contractor) has been awarded the work for the implementation of the RIs at Operable Units I, III, and IV. HLA will be a subcontractor to PRC for this work. Field work is scheduled to begin on October 8, 1990.

The award also includes the implementation of the *Air Sampling Plan* and preparation of a background sampling plan. The first step for implementation of the *Air Sampling Plan* will be preparation of an addendum to the plan presenting updated and analytical methods.

The Navy's recommended approach to the background sampling program for HPA includes statistical analysis of the existing data to provide a preliminary indication of the background levels of metals and PAHs in the soil and groundwater as well as to evaluate the number of samples required for the evaluation of background conditions at HPA. The attached description of this approach was distributed and the Navy requested agency input prior to completion of the draft plan. EPA said that their review would require 20 days. The Navy requested faster turn around time if possible.

The Navy requested clarification from EPA regarding the analytical program they would require for the RI generated materials at HPA. The EPA stated that if the materials are not characterized as a RCRA waste, then they would defer to DHS. EP toxicity tests or TCLP tests, as appropriate, should be performed in addition to the WET to characterize the materials.

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Underground Storage Tanks:

The contents of the original 23 underground storage tanks identified by Martin Marietta were removed by August 2, 1990 and properly disposed. Tank 214 which previously contained petroleum sludge has refilled with approximately 10 inches of water and tidal influence is apparent.

WESTDIV met with the agencies on August 3, 1990 to discuss comments received regarding the closure plan for the tanks. Submittal of a revised plan is expected by September 14, 1990.

The locations of an additional 12 tanks have been confirmed and their contents sampled. Most of the tanks contained petroleum products with low heavy metals concentrations. WESTDIV will send copies of the analytical data to the agencies.

There may be an additional 12 tanks at HPA based on existing drawings but these tanks are located under building slabs. WESTDIV will use surface geophysical methods to confirm their locations.

One potential additional tank has been identified beneath Building 506, a radioactivity lab which has been demolished. Surface geophysical methods have confirmed the location of a large metal object. The contents and status of the suspected tank are not known at this time. WESTDIV has contacted the NRC and is working to find more information regarding the tank.

Environmental Sampling and Analysis Plan/Storm Water Sampling:

Submittal of the environmental sampling and analysis plan to the regulatory agencies is expected by August 30, 1990. Integrity testing of the storm sewer system is not included in this plan. The storm water sampling for chemical characterization is authorized and can be implemented during the next rainstorm.

Formerly Used Defense Sites:

The Army Corps of Engineers (COE) inspected HPA three weeks ago with their contractor and the Navy to evaluate previously owned properties which may be eligible for inclusion in the Formerly Used Defense Sites (FUDS) program. Based on preliminary results of the inspection, the University of California San Francisco (UCSF) property was the only eligible area identified. A draft report evaluating the site is due within about three weeks, the final report should be completed within approximately two months. The COE will require a negotiated agreement between the Navy, COE, UCSF, and regulatory agencies for the implementation of the RI/FS activities at the UCSF property.

Technical Review Committee Meeting
Hunters Point Annex
August 15, 1990

Next Meeting

The next meeting is scheduled for October 24, 1990; 0930 hours. It will be held in the Treasure Island conference room in the south end of Building 1.

Summary of Notes

A summary of this meeting notes was presented.

MEL:js/ML-6/010

AGENDA

Technical Review Committee Meeting
Hunters Point Annex
August 15, 1990
Treasure Island, California *

- I. Approval of minutes of last meeting
- II. Federal Facility Agreement/Technical Assistance Grant
- III. Removal Action Status Report
 1. Pickling and Plate Yard
 2. Asbestos
 3. Tank S-505
 4. Tank Farm
 5. Sandblast Grit Fixation
- IV. RI Activities
 1. Reconnaissance Report
 2. IR-10 and IR-11 Groundwater Sampling
 3. Status of Operable Unit II
 4. Status of Operable Units I, III, and IV
- V. Underground Tanks
- VI. Environmental Sampling and Analysis Plan/Storm Water Sampling
- VII. Formerly Used Defense Sites
- VIII. Next Meeting
- IX. Summary of Notes

* Meeting will be held in Building 1, Naval Station Treasure Island Conference Room which is at the south end of Building 1.

Technical Review Committee Meeting
Hunters Point Annex
June 13, 1990
Treasure Island, California

ATTENDEES

<u>Name</u>	<u>Affiliation/Phone Number</u>
MARY LUCAS	HLA 899-7350
RICHARD POWELL	NAVY 244-2554
JULIE CARVER	US NAVY 244-2557
Lynn Nakashima	DHS 540-3818
Catherine walter	Bechtel 768-9494
Scott Lutz	BAAQMD 771-6000
Dave Wells	SFDPH 554-2796
Carl Michelsen	HLA 899-7358
Gary Welshans	PRC 543-4880
Emir Utush	PRC 11
KAM TUNNEY	TI 822-4229
EDDIE V. SARMIENTO	NSTI 395-5452
JOHN ROMIC	HLA 899-7320
Semiramis Ardalan	HLA 899-7324
CHUCK FLIGGA	EPA 744-1996
Tom Gandesbery	ICWDCB 254-0841
JUNE H CARVER	ATT 934-4884
Rm Block	ATT 934-4884
Louise Lew	US Navy 244-2551

DRAFT 8/14/90

BACKGROUND SAMPLING WORK PLAN-- STATISTICAL APPROACH
HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA

1.0 INTRODUCTION

Background sampling of soils and groundwater at Hunters Point Annex (HPA) is proposed to distinguish ambient or background levels of chemicals from those which are site-related. Comparisons of these levels are necessary to establish soil and groundwater clean-up levels. This assessment is also an integral part of the Public Health and Environmental Evaluation (PHEE). The focus of the investigation is on inorganic and organic constituents whose concentrations may pose a hazard to human health or the environment.

2.0 APPROACH

The evaluation of ambient or background levels will utilize analytical data for selected metals and PAHs, and will be conducted in two phases. Phase 1 consists of a preliminary examination of existing data by various statistical and graphical techniques. Phase 2 encompasses a statistical evaluation of the number of additional samples required to establish background soil and groundwater concentrations. These phases are as follows:

2.1 PHASE 1, PRELIMINARY DETERMINATION OF BACKGROUND OR AMBIENT CONDITIONS

The following procedure will be followed.

- o Soils and/or groundwater chemical data for the Group II sites (IR-6, IR-8, IR-9, IR-10 and IR-11) will be compiled. These data were selected from all of the sites at HPA because the existing computer chemical database is the most complete.
- o Data will be sorted on the basis of site, sampled media, analytical parameter, lithology, depth, and/or aquifer type. For each metal and for a selected set of PAHs, sets of data will be plotted on two types of

graphs, 1) a normal-probability plot and 2) a distribution plot of concentration versus frequency of occurrence (a histogram).

- o Following creation of these media or other specific graphs, similar plots will be created with data sorted by parameter, lithology, depth, and/or aquifer type.

The distribution of data points on these graphs may give an indication of background levels. For example, the data for samples of similar lithology will be plotted on a normal-probability graph (Figure 1) using GEO-EAS (EPA, 1988). If the data points lie on straight lines of different slope then each portion may indicate a different distribution. The lower slope line might be representative of background/ambient soil concentration; the higher sloped portion of the distribution may represent site-related contaminated soil.

Similarly, histograms of concentration versus frequency (Figure 2) may be used to reveal bimodal or other distributions of chemical concentrations. In Figure 2, background concentrations of a constituent may be inferred from the bimodal distribution (i.e., the lower concentration hump is "natural").

These graphs will be used to assess the degree to which existing analytical results from the Group II sites show a background/ambient distribution of chemicals by the sorting criteria identified above (e.g. site, media, lithology, depth, and aquifer). During the course of the investigation other graphical and/or statistical treatments may be applied, if necessary, to develop a preliminary assessment of background conditions at the Group II sites.

2.2 PHASE 2, BACKGROUND SAMPLING AND ADDITIONAL STATISTICAL EVALUATION

Soil and groundwater sampling will be conducted to confirm the background concentrations of naturally occurring and/or ambient chemicals determined in the above analysis. The sampling will be conducted in areas at HPA where no previous waste disposal is suspected.

For each constituent background distribution developed in Phase 1, preliminary estimates of the mean and variance of the data will be compiled. The appropriate number

of additional samples (n) to be collected from each media will be estimated from the statistical procedures described in Volume II, Chapter Nine of SW-846 or other suitable statistical references. The appropriate number of samples to be collected from each media will be the greatest of the individual n values determined for each constituent.

2.3 BACKGROUND SAMPLING PLAN

The background sampling plan will present the methods and results of the graphical and statistical evaluation of existing data conducted in Phases 1 and 2. Recommended locations for background borings and monitoring wells will also be presented and planned field and analytical methods and QA/QC procedures will be described.

The recommended locations for additional samples will be developed from the following:

- o review of existing reports to locate on or off-site areas in which it is known or suspected that there was a lack of site activity or contamination
- o maps of chemical data showing hot spots
- o background conditions established in the above evaluation.

Example outputs from GEO-EAS

