



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105

November 1, 1990

Commanding Officer
Naval Station Treasure Island
ATTN: Eddie Sarmiento
Building I (Code 70)
San Francisco, CA 94130

Dear Mr. Sarmiento:

Enclosed are EPA's comments on the draft final **Workplan for a Removal Action at the Tank Farm** at Hunters Point Annex. If you have any questions, please call me at (415) 744-2388.

Sincerely,

A handwritten signature in black ink that reads "Chuck Flippo".

Chuck Flippo
Remedial Project Manager

cc: Louise Lew, WESTDIV
Mark Malinowski, DHS
Tom Gandesbery, SFRWQCB
Scott Lutz, BAAQMD
David Wells, SFPHD

**EPA COMMENTS ON DRAFT FINAL WORKPLAN FOR A REMOVAL ACTION
AT THE TANK FARM AT HUNTERS POINT ANNEX**

1. **Page 5, Section 1.0.** Some minor corrections: In the top paragraph on page 5, the phrase "or Land Disposal Restriction" should be deleted. Also, it is customary (and generally clearer) to cite the NCP as **40 CFR Part 300** rather than as an EPA publication, as you have done here: "(EPA, 1985)."

2. **Page 10, Section 2.2.** We note that, in the first paragraph, some additional clarification regarding the AEMC data has been added in response to one of our previous comments. The AEMC data sheet included in Appendix B, however, remains unclear. There are several samples shown which contain PCBs, up to 2000 ppm. There is not an adequate identification of where these samples are from. Therefore, it is not clear that the data in Appendix B supports the statement that "PCBs were not detected in the remaining AEMC samples."

3. **Page 11, Section 2.2.** In the middle paragraph, the statement is made that lab reports for the analyses of the tank contents sampled by HLA appear in Appendix B. We could not identify these lab reports, as those in Appendix B appear to be for soil samples only. The sample log which is on the back of Plate B1 appears to identify only soil samples. Also, the log does not include all the soil samples shown on Plate B1 and nor all the samples for which lab reports appear in the Appendix.

As a result of these discrepancies, we have been unable to reconstruct the analyses used to construct Table 1. Nor can EPA and DHS locate a copy of the original report of these analyses, HLA's 1988 report entitled **Tank Sampling Investigation, Tank Farm Naval Station, Treasure Island, Hunters Point Annex, San Francisco California**. Therefore, we remain uncomfortable with statements such as that made on page 6, that a "hazardous waste profile" will be developed "based on existing data."

Our concern regarding both comments above is that, without adequate analysis of the tank contents before they are removed from the tank, the tank contents may pose health threats which are not adequately taken into account during the handling and storing of the removed materials. This same concern also applies to the contents of the sump, which the Navy still plans to sample only after they have been removed from the sump.

EPA proposes to resolve this matter in the following manner: The Navy should proceed to prepare Volume II of the workplan, including the waste profile. In the meantime, we request that a copy of the 1988 HLA report on the tank contents cited above be sent to EPA and DHS. EPA will review HLA's 1988 report and determine whether we believe additional sampling and analysis needs to be done before the design document (Volume II of the workplan) is completed. We will present our conclusions to the Navy with our comments on the preliminary draft of Volume II, if not before. We will also be glad to meet with the Navy and your contractors to further discuss the sampling data at your request.