



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

N00217.001630
HUNTERS POINT
SSIC NO. 5090.3

November 28, 1990

Commanding Officer
Naval Station Treasure Island
ATTN: Eddie Sarmiento, Staff Civil Engineer
Building I (Code 84)
San Francisco, CA 94130

Dear Mr. Sarmiento:

Enclosed are EPA's comments on the Preliminary Assessment: Other Areas/Utilities at Hunters Point Annex. We commend The Navy for the extensive effort put in to completing this Assessment.

The majority of our comments are editorial in nature. We do have certain substantive concerns, however, which may be worth discussing further at a meeting. In particular, I would like to note the following:

1) The reference on Page 47 to dermal contact by the public concerns us in that the statement suggests certain assumptions are being made regarding risk to the public which may not be appropriate. If this is not what is intended, then the current wording is very misleading.

2) The data from the EMCON area study seems to be discounted without adequate justification, as noted in our comment concerning page 52. If there is a rationale for not giving the area study data the same weight as subsequent studies, that rationale should be presented.

If you would like to discuss setting up a meeting to go over our comments, or if have any questions, please call me at (415) 744-2388.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chuck Flippo".

Chuck Flippo
Remedial Project Manager

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

**ATTACHMENT 1 - SPECIFIC COMMENTS ON THE
PRELIMINARY ASSESSMENT
OTHER AREAS/UTILITIES
REPORT**

Section 1.0 Introduction

Page 1: The definition of other areas/utilities is somewhat confusing. It would be difficult for someone not well-acquainted with the project to understand exactly which areas of the site fall under these classifications. Since this report will be available to the public, the specific areas of the site that are being addressed should be clearly presented. Perhaps the use of a site location map that only presents the other areas/utilities would help. Plate 2 of this document presents too much information to allow easy identification of the study areas of concern.

Page 5: The first sentence of the first paragraph on the page contains a typographical error. The sentence reads: "...grouped into sites or the basis of location..." The sentence should read: "...grouped into sites on the basis of location..."

Section 3.0 Other Areas

Page 12: The fourth sentence of the second paragraph of the page currently reads: "...equipment was previously located and releases of PCB to the environment could have occurred." A suggested change for clarification is: "...equipment was previously located and where releases of PCBs to the environment could have occurred."

Page 12: The second sentence of the third paragraph on the page refers the reader to Table 2, which contains a list of the buildings identified on the 1971 drawing for which no information was found. It would also be useful to refer the reader at this point to Plate 3 for the locations of the buildings listed in Table 2.

Page 13: The third sentence in Section 3.2.1.2 refers to Building 124. This building is not depicted on Plates 2 or 3. Where is/was it located?

Page 16: The first sentence in Section 3.2.4 is confusing. It currently reads: "HLA reviewed available information on oil-containing electrical PA equipment removed before the 1988 YEI investigation..." What is the purpose of PA in this sentence. It does not appear to stand for Preliminary Assessment. Is it a typographical error?

Page 19: The first line on the page reads "...therefore all capacitors were presumed to which contain PCBs on the basis of..." A suggested change for clarification is: "...therefore all capacitors were presumed to contain PCBs on the basis of..."

Page 19: The first sentence in Section 3.2.4.2 refers to 199 transformers that were removed from service prior to the YEI survey. No

indication is given as to whether or not these transformers were removed from their former locations or left in place.

- Page 19: The last sentence of Section 3.2.4.3 refers to Dry Dock 2 and Drydock 2. In order to avoid possible confusion, it would be worthwhile to choose one convention throughout the document. Elsewhere in the document, "drydock" is the spelling used.
- Page 19: The last sentence of Section 3.2.5 states that the portion of the right-of-way between Underwood and Bancroft Avenues was not surveyed because of personnel safety concerns. The specific source(s) of the concern are not presented. Were the concerns due to potential exposure or to accessibility problems?
- Page 22: The use of STLC and TTLC values to provide an assessment of potential soil contamination by metals may not be appropriate. STLC and TTLC values indicate whether or not a material should be considered a hazardous waste. These values are not meant to be the thresholds beyond which a material is considered to be contaminated. Soil and water concentrations below the STLC and TTLC values could pose significant health and environmental risks.
- Page 23: The second sentence of the first paragraph states that the levels listed in Table 6 reflect the acceptable upper concentration limit of petroleum hydrocarbon constituents in soil. Such limits do not exist. Acceptable concentrations are determined on a site-by-site basis after considering contaminant migration pathways, possible receptors, and acceptable levels of risk.
- Page 24: Possible typo. "Building 126" should be Building 128? No Building 126 appears on Plate 2 in PA-24, nor in Table 13. Examination of location of borings cited in this section suggest this is Building 128.
- Page 26: The first sentence of the first paragraph on the page identifies the five soil borings near Building 704 as ADE-17, ADE-20, AE4-2, AE4-4 and AE4-5. Later in the same section, two other borings are referenced (AD4-2 and AD4-17). No explanation is provided as to the origin of these two additional borings. Are these borings from the same area?
- Page 26: A reference is made to "manmade asbestos". It is not clear whether this means asbestos-containing manmade materials or processed asbestos fibers as distinguished from asbestos fibers weathered from serpentinite occurring naturally in the vicinity of HPA. In either case, asbestos is a naturally occurring material which is mined and then processed into insulation and other products; the asbestos fibers are not manmade.
- Page 26: The last sentence of the first paragraph discussing Building 707 references data collected from Boring AE4-2. This boring was described above as being in the vicinity of Building 704, not Building 707. Clarification is necessary.
- Page 27: The first sentence of the first paragraph on the page states that metals were present in the soil samples from near Building

707 at concentrations exceeding their respective TLICs. This means that the soils could be considered hazardous waste by the State of California, but somehow Building 707 has been completely omitted from Table 14 which groups and prioritizes the sites identified for investigation. If there is sufficient justification to eliminate this particular building from further investigation, it should be explicitly stated here.

Page 28: See previous comment on use of term "manmade asbestos".

Section 4.0 Underground Utilities

Page 40: It is unclear why drainage areas A, E, F and H are singled out; areas B and D seem to fit the description for potential contaminant releases equally well.

Page 41: The second sentence in Section 4.1.2.2 contains a typographical error. The sentence reads: "...the sewer ~~system~~ in these areas are likely to be contaminated..." The sentence should read: "...the sewer ~~systems~~ in these areas are likely to be contaminated..."

Page 47: The last sentence which indicates that dermal contact by the public is not expected is only true as long as the Navy retains control of the property. As portions of the HPA property may be leased to the City or otherwise given over to public use in the foreseeable future, this is not an acceptable conclusion.

Section 6.0 Summary and Site Ranking

Page 51: The second sentence of the second bulleted paragraph appears to say that some sites were not reviewed in this document and these also are recommended for no additional action at this time. If some sites have not been reviewed and are eliminated from further action based solely on building title, there is some potential for overlooking sources of contaminants. Sites not reviewed should be clearly indicated in Table 13.

Page 52: There appears to be a bias for recommending RI status such that only sites with analytical data collected by HIA are included in this group. Sites for which "the available analytical data are from the area study (EMCON, 1987b) only" are given SI status. For these SI sites, the level of semivolatile organic compounds found in samples from the EMCON study along with the proximity of some sites to IR sites would seem to indicate that a more rigorous further investigation than a site inspection is needed. These sites should be added to the RI or their exclusion further justified.

Page 55: The second two bullets at the top of the page describe activities which are part of the RI. Recommendation as SI activities is inappropriate.

Page 55: The first sentence of Section 6.4 is confusing. The sentence reads: "...sites which contained former 99 PCB-containing transformers that were removed prior to the YEI survey are

recommended for a SI." The "99" seems inappropriate or misplaced in the sentence. Clarification is necessary.

Page 56: It is stated in Section 6.6 that draft work plans can be prepared for submittal within 4 months of authorization to proceed. It is not clear as to whether all of the work plans will be completed at the same time (4 months after commencement) or whether some work plans will be ready earlier, with the final plan ready at the end of 4 months.

Plate 2 Building 124 does not appear to be identified on this plate.

PA-37 appears twice. Probably PA-37 at Building 306 should be PA-35.

PA-38 in assigned to Buildings 505 and 524. Probably should be PA-39.

Building 500 is listed as PA-38 in Tables 13 and 14, but not on Plate 2.

Building 707 is not assigned to a PA.

PA-44 does not have a boundary.

Table 13 Building 364 is listed as PA-35; it should be PA-33.

PA-44 Buildings 408, 409, 410 are recommended for No Action.

Building 710 is listed as NA, it should be PA-36.

Table 14 According to Table 13, PA-39 should include Building 707.

PA-49 has not been assigned a recommendation (No X).

Some of the sites recommended for SI are also recommended for additional sampling to confirm the presence of contaminants. This recommendation is listed in Table 13, but not in Table 14 which is the summary of sites recommended for RI or SI actions. As prioritization of SI sites in Table 14 does not appear to be related to existing analytical data, an annotation of this table to indicate those sites with contaminants previously identified would make it more useful.

ATTACHMENT 2
PAGE 1 OF 2

EPA COMMENT ON PRELIMINARY ASSESSMENT
OTHER AREAS/UTILITIES

THE ABOVE IDENTIFIED PAGE IS NOT
AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
SOUTHWEST DIVISION TO LOCATE THIS PAGE.
THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.

QUESTIONS MAY BE DIRECTED TO:

DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
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In Table 8 GPR in the ORP gave a sharp change in reflection character and signal penetration at suspected transition zone between serpentinite fill and sandblast debris piles. The text (p. 52) notes that at this location GPR recorded a sloping reflection suggesting some type of subsurface boundary, the character of which could not be determined.

The data in Appendix G, Table 9, and the text show some inconsistencies:

In Table 9 GPR records suggest a change in the subsurface in IL for records IR01GP02 and IR01GP03, but not IR01GP01. In the Appendix records IR01GP01 (Plate G1-3) and IR01GP02 (Plate G1-4) do not appear that different and neither has any annotation by the geophysical contractor. The only annotation among the three records is of IR01GP03 (Plate G1-6) that indicates a possible landfill anomaly. The text (p. 45-46) notes that IR01GP02 reflects a subsurface change (consistent with Table 9, but not annotated in data), however, IR01GP03 did not show a definitive change that might indicate a landfill boundary. Is the text misrepresenting the data?

Table 9 and annotation of the GPR data for SBA indicate record changes suggesting subsurface changes only for record IR07GP01, and not for IR07GP02, IR07GP03, or IR07GP04. The text (p. 57), however, notes that all four GPR profiles showed indications of subsurface lithology changes that might suggest boundaries of sandblast wastes.

The most effective presentation of the geophysical survey is for the EM survey. This may be appropriate since the most information was obtained from this method. Plate 22 is a very useful presentation of the results. It would have also been helpful to have had the actual data presented as a separate contour plot, as is usually done, to allow for additional assessment of the interpretations. For example, with a contour plot the definition of the 3 EM Type ranges may be more readily apparent. EM data was also obtained during the test survey for the BF and ORP areas. It would be helpful to have this data as clearly presented in the main report as was the EM data for IL. It may help in clarifying why EM was not used outside of the IL area.

Attachment 3 - Comparison to Sampling Plan

Group I sites: Industrial Landfill, Bay Fill Area and Oil Reclamation Ponds

Two subjects identified in the Sampling Plan, but not clearly addressed by the Reconnaissance Activities Report are that 1) the survey data was to be used to identify subsurface obstructions and structures and, 2) the information was to be used to in designing safety protocols during primary investigations.

An additional objective was to assist in delineating the Triple A sites. It is not clear from the Reconnaissance Activities Report whether the Triple A sites were delineated or not.

Group II sites: Tank Farm, Building 503, Pickling and Plate Yard, Battery and Electroplating Shop, and Building 521

In the Sampling Plan for the Tank Farm, it was stated that survey data was would be used to locate buried piping as well as utility lines and other subsurface obstructions to drilling; however, this was not addressed by the Reconnaissance Activities Report.

Group III site: Transformer Storage Yard

No comments.

Group IV site: Sub-Base Area

No comments.