

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAMHEINZ AVE., BLDG. 5, STE. 200
EMERY, CA 94710
(415) 540-3724

December 3, 1990



Commanding Officer
Naval Station Treasure Island
Building I (Code 70)
San Francisco, CA 94130-5000

Attn: Mr. Eddie Sarmiento

Dear Mr. Sarmiento:

DHS COMMENTS ON THE DRAFT PRELIMINARY ASSESSMENT, OTHER
AREAS/UTILITIES - HUNTERS POINT ANNEX

Enclosed are the Department of Health Services (Department) comments on the Preliminary Assessment, Other Areas/Utilities for Hunters Point Annex. The Department did not receive comments from any other State agency.

Please respond to all comments on a point-by-point basis and add the comments and responses as an appendix to the final draft of the Preliminary Assessment.

The Department would like to meet with the EPA, the Navy and any other interested regulatory agency to discuss comments and approaches for the PA sites.

If you have any questions regarding these comments, please contact me at (415) 540-3816.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Malinowski".

Mark Malinowski
Engineering Geologist
Site Mitigation Branch
Region 2
Toxic Substances Control Program

Enclosure

cc: See attached list

DHS Comments
Preliminary Assessment Other Areas/Utilities
Hunters Point Annex, October 19, 1990

General Comment:

It is unclear on how the objectives and technical approach will be integrated to deal with the alleged illegal dumping by Triple A Machine Shop. Lack of documentation and no analytical data (Site Evaluation) does not mean the site can be considered clean. Triple A may have used the area for improper disposal/storage of hazardous materials. The Department would like to further discuss this issue with the Navy, EPA and any other interested regulatory agency.

Specific Comments:

<u>Pg</u>	<u>Sec</u>	<u>Pgph</u>	<u>Line</u>	<u>Comment</u>
2	1.2	1		First Bullet. Replace the word operable unit with "sites".
3	1.3	1		Second Bullet. Replace the word operable unit with "sites".
4	1.4	5		<u>Step IV: Site Evaluation</u> The last sentence states that areas where no analytical data was evident were recommended for no further action. Lack of analytical data should not be a sole justification for not investigating an area.
5	1.4	1	2	Typo; ...grouped into sites <u>or</u> the basis...
12	3.2	3	2	Reference Appendix B when discussing "...the 1971 drawing...."
13	3.2.1.2	1		Building 124 is not identified on the Plates. In the text, specify the previous location of Bldg 124 and the associated tanks.
16	3.2.4	1	1	Edit; ...oil-containing electrical <u>PA</u> equipment
18	3.2.4.1	1	2	Indicate if any visible signs of oil spillage found near transformer P-529.
19	3.2.4.1	1	1	Edit; ...were presumed to <u>which</u> contained ...
21	3.3.1	1	4	Edit; ...are identified for evaluating <u>of</u> groundwater quality. Explain why groundwater quality criteria are not identified.

<u>Pg</u>	<u>Sec</u>	<u>Ppgh</u>	<u>Line</u>	<u>Comment</u>
23	3.3.1.3	1	1	Specify that "the acceptable upper concentration limit" are RWQCB numbers and do not represent health based risk assessment levels.
24	3.3.2.1	3		Building 126. Should this be Bldg 128?
26	3.3.2.1	1	1	Building 704. Typo; ...borings (ADE-17, ADE-20,... correct the "E" to "4". Line 4 boring <u>AD4-2</u> should be AE4-2.
		4	4	Building 707. Typo; boring <u>AE4-2</u> should be AE4-1. Line 6, boring <u>AE4-3</u> should be AD4-3.
28	3.3.2.2			Building 156 is identified as a Rubber Shop in the Building List. Provide further information on the activities at Bldg 156 and the Rubber Shop Annex (Bldg 163). Benzene was a common solvent for use with rubber products. Future sampling at this site should include sampling for VOCs. New information may necessitate including Bldg 156/163 in Table 4.
29	3.3.2.2	1	5	Appendix G does not contain the SOC results.
33	3.3.2.5	1	3	Present the WET results for boring SP-5.
43	4.3	1		What methods will be employed to further identify the locations of chemical and/or acid/electrolyte supply lines?
40	4.1.2	1	10	DHS believes that the lower (closest areas to the S.F. Bay) sections of Drainage Areas C and D should also be included as having a high potential for contamination. The lower section of C captures drainage from the battery and electric shops, as identified in Table 11 and from the submarine drydock activities. The lower section of D captures drainage from not only the tank farm and Bldg 101, as identified in Table 11, but also Buildings; 156 - Rubber shop (possible benzene); 134 - Machine Shop, (metals, oils, solvents); 124 - (acid and electrolytic tanks.)
55	6.3.2	1		A soil gas survey should be evaluated as a first step prior to soil sampling.

<u>Pg</u>	<u>Sec</u>	<u>Pgph</u>	<u>Line</u>	<u>Comment</u>
55	6.4	1	1	Edit; ...which contained former <u>99</u> PCB-containing.... Line 3, will the SI site visit include sampling, or is the visit only visual confirmation?
Table 4.				Add notes 1 & 2 to each page. Pg 2 of 4, Explain what is meant by Side Reach. Should it be Reach 2?
Table 13.				Building 364 is identified in Table 14 as part of PA-33 while Table 13 identifies it in PA-35. Correct discrepancy. Explain why Bldgs 408, 409 and 410 are included in PA-44 but the Recommendation is No Action. Include Bldg 710 in site PA-36 as identified in Table 14.
Table 14.				Building 707 should be included in PA-39 as identified in Table 13.
Plate 2.				IR-21 is not labeled. Building 306 incorrectly labeled as PA-37. Reposition PA-38 label. PA-39 is not labeled. Stipple the PA-43 area. Stipple the PA-44 areas.
Appendix G.				Include SOC analyses results.