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Ser 1811RP/00579



Mr. Chuck Flippo
Remedial Project Manager,
Hunters Point Annex (H-7-5)
U.S. Environmental Protection Agency, Region 9
Hazardous Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105

Mr. Mark Malinowski
California Department of Health Services
Toxic Substances Control Program
Site Mitigation Branch
700 Heinz Avenue, Bldg. F
Berkeley, CA 94710

Dear Mr. Flippo and Mr. Malinowski:

In accordance with the Federal Facility Agreement for Naval Station, Treasure Island, Hunters Point Annex, Section 18, Remedial Project Managers, Paragraph 18.3, please find attached draft minutes from the December 14 and December 20, 1990 informational update meetings held between the Navy, Environmental Protection Agency and Department of Health Services and Regional Water Quality Control Board (December 20th only). Unless comments are received on the draft minutes within five working days, the minutes will become final.

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) Draft Meeting Minutes December 14, 1990
- (2) Draft Meeting Minutes December 20, 1990

Copy to:

Regional Water Quality Control Board (Attn: Steve Ritchie)
Bay Area Air Quality Management District (Attn: Scott Lutz)
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, 09A2A.20, 24, 09B
181, 1811, 1811RP, 1811JC, 1811RC, PWC S.F. BAY (Code 420)

(w/ encl) Admin. Record
Harding Lawson Associates (Attn: Mary Lucas)
PRC (Attn: Gary Welshans)
COMNAVBASE S.F.
OIC Treasure Island, HPA
NAVSTA Treasure Island
COMNAVSEASYSKOM (ATTN: Robert Milner)

Writer: R. Powell, Code 1811RP, x2555
Typist: B.Palmer, 2 Jan 91, Dft Mtg Minutes #00579
File: HP/DOHS

1. **Agenda:** See attached
2. **Attendees:** See attached
3. **PA Other Areas/Utilities:** The agencies concurred with the Navy's recommendations regarding each site recommended for a remedial investigation (RI). They questioned why sites where data from Emcon are available are recommended for a site inspection (SI) only. HLA stated that the data are from previous investigations where the analytical methods were not necessarily consistent with the existing analytical program. Moreover, many of the samples were composited. The validity of these data are also unknown. Sites where Emcon data are available and the presence of chemicals is noted are recommended for a high priority SI.

The agencies expressed a concern that there was no information regarding building usage presented for several buildings where no further action is recommended. Also, additional areas where Triple A Machine Shop may have disposed of hazardous materials were not evaluated. They asked whether additional interviews were conducted to evaluate these potential areas of contamination. They also stated that three years ago they requested that the Navy conduct sampling in a grid over the entire HPA facility to evaluate unknown areas of contamination.

The Navy stated that extensive interviewing was conducted for the Initial Assessment Study (IAS) and the San Francisco District Attorney's (SFDA) office investigation of Triple A. Additional interviews were not conducted, but original notes from the IAS were reviewed. Triple A sites identified by the SFDA are currently under investigation.

The Navy stated that sites at Hunters Point Annex were closely evaluated on the basis of all available information. This included the "Fence-to-Fence" Survey that took a detailed look at all Navy lands, buildings and structures for signs of any contamination.

Recognizing the possibility that some contamination may still be undiscovered, the Navy stated that an investigation will be conducted at all sites planned for construction in the future. If contamination is present at such a site, the Navy will thoroughly investigate and remediate the site.

This was the agreed upon approach used in the approved Environmental Impact Statement for the proposed homeporting of the USS Missouri. It is also the identical approach the City and County of San Francisco uses for land in the South Bayshore Planning Area. The Navy stated that this methodology is more likely to identify remaining possible sites than performing additional grid sampling that still leaves far more area unsampled than sampled. The Navy therefore believes that no further work need be done.

Finally, sampling planned along the storm and sanitary sewer lines will serve to provide additional data points, and screening for missed areas of contamination throughout HPA.

The agencies stated concerns with this approach. Given the nature of this question, however, the project managers would have to review this issue with their management. The agencies indicated they would have a proposal for Navy consideration on January 15, 1991.

The next step of the investigative process will be to prepare RI and SI work plans for the sites identified by the PA for the other areas/utilities. The agencies concurred that these plans can be prepared for the sites identified by the Navy. They stated that they are still evaluating how to deal with the buildings where little information is available. They will submit final comments on the PA for the other areas/utilities by January 15, 1991. The Navy stated that if concurrence on the investigative approach is reached by mid January they expect to award preparation of the SI and RI work plans during the second quarter of the fiscal year.

The Navy requested that the PA report be considered a secondary document. The agencies concurred. A response to comments received will be submitted to the agencies within 45 days of receipt of the final agency comments.

The EPA also questioned which Navy programs will be used to address the current transformer sites and buildings containing asbestos. The Navy stated that these sites will be addressed by programs administered by Naval Station Treasure Island because they are current operations at Hunters Point Annex. Previous transformer sites identified in the PA report for the other areas/utilities will be addressed under the Installation Restoration program.

4. Westdiv project manager and task assignments: The agencies requested clarification from Westdiv regarding which activities each Westdiv representative is responsible for. The responsibilities of each are as follows:

Richard Powell: Lease negotiations with the City
Operable Unit II
Operable Unit V
Environmental sampling and analysis
Oil reclamation ponds
FFA finalization
Interim soil remediations

Julie Carver: Underground storage tanks
Removal actions
Background sampling
Operable Unit I
Operable Unit III
Operable Unit IV
Overall contractual issues

Ray Chiang: Tidal influence studies
Sandblast grit
Formerly used defense sites
PA Other Areas/Utilities

Julie will be gone for a month. During that time, Richard will be responsible for most of her tasks. Ray will be responsible for the removal actions.

5. **Status of PPY Air Modeling:** The screen model with annualized emission rates has been completed and the results will be included in an addendum to the report of air modeling and risk assessment. This approach to the air model is considered technically acceptable. A description of the revised approach will be faxed to the agencies on Monday. The addendum to the report will be submitted by January 10, 1991.
6. **Status of Oil Reclamation Ponds:** The Navy is developing a program to evaluate removal of floating oil as part of the site investigative activities at the oil reclamation ponds (Site IR-3). The first step was collection and analysis of a sample of the oil. The analytical results are not available at this time. Once they are received removal and disposal options for the oil will be evaluated.

The DHS suggested the use of dedicated pumps to remove product. The Navy stated that once the analytical results are available, the product will be bailed to evaluate removal options. If further removal is necessary, then a new contract action will be required to pay for it.

The DHS stated that based on the results for a previous sample collected by Emcon Associates the oil contains dichlorobenzenes and some semivolatile organics. The Navy stated that the results of the sample collected during this investigative phase will be used to verify these results.

7. **Status of the Environmental Sampling and Analysis Plan:** Finalization of the Environmental Sampling and Analysis Plan will be performed under the Navy CLEAN contract. Award of the work is expected next week. Because it will be necessary to meet with the regulatory agencies prior to revising the plan, the Navy will probably request an extension to the submittal date for the draft final plan. It was agreed to discuss the necessary changes to the plan with the regulatory agencies at the end of the Technical Review Committee on January 10, 1991.
8. **Removal Action Plans and Specifications:** The Navy is preparing to submit the 100 percent design documents for the removal actions at Tank S-505 and the Tank Farm on January 22 and March 8, 1991, respectively. They requested 30 day review time by the agencies and will also respond to comments within 30 days. If this schedule is met, bid openings are expected in June and July. It will require approximately 60 days after bid opening to mobilize the contractors because of the necessary time for the contractor to develop extensive health and safety and emergency response plans.

All agency comments received on the work plans will be incorporated into the design documents. The DHS asked how soil containing PCBs will be handled during the removal action. The Navy stated that it will be placed in lined bins. They also stated that they are getting a sole source bid for the use of the tank cleaner specified by the agencies.

No definite date has been set up for submittal of the Pickling and Plate Yard design documents because finalization of the work plan depends on the results of the air modeling and risk assessment. The preview final work plan is expected by early May.

The preview final closure plan for the underground storage tanks has been submitted to the regulatory agencies. It will require 30 days after approval of the plan for the Navy CLEAN contractor to obtain bids for the tanks closures. Depending on when the plan is finalized, it is expected that the closure contractor will begin field operations by the end of March. Submittal of the draft removal action plan for the additional 17 underground storage tanks identified at HPA is expected by the middle of April.

Benchscale treatability testing to evaluate the applicability of recycling the sandblast grit into asphalt is planned for December 19, 1990. The DHS said that they would like to attend.

9. Six Month Outlook: The following activities and deliverables are planned during the next six months:

- Storm water sampling
- Site inspections at Sites PA-16 and PA-18
- Remedial Investigations for O.U. V
- Revisions to the PHEE work plan
- Air sampling
- Quarterly well monitoring program
- O.U. II tidal influence study
- Pilot tidal influence study
- O.U. II Summary of Findings Memorandum
- Phase 2A data submittals for O.U.s I, III, and IV
- Phase 2B field activities at O.U.s I, III, and IV

10. Groundwater Sampling Reports for Sites IR-6, IR-8, and IR-9: The DHS stated that they have some comments relating to the groundwater sampling reports. EPA is not ready with comments at this time. Agency comments will be discussed at the meeting between the Navy and the agencies on December 20, 1990 at 11:00.
11. Other: The Navy presented a discussion of the status of the lease negotiations with the City of San Francisco. The Mayor's office will be the lead for the negotiations and will meet with the Navy. Dennis Drennon, the head of the real estate department, will be the lead for Westdiv. Karen Borel will be the Westdiv contact for legal matters. A report regarding the status of the negotiations is due to the armed services committee by February 1, 1991. Past proposals presented to the Navy have called for major development of portions of HPA.

San Francisco Focus will be doing a major article on the clean up of HPA in June or July. Randy Friedman is planning media availability days to discuss the lease and the removal actions. In addition, he is making arrangements to broadcast an edited 1/2 hour section of the video tape of the recent community meeting. The City has requested that the Navy provide a status of the clean up activities.

Attendance Sign Up
 Hunters Point Annex Project Manager Meeting
 14 December 1990 - 0900

<u>NAME</u>	<u>Representing</u>	<u>Phone</u>
<u>RAY CHIANG</u>	<u>Navy - WESTNAVFAC CODE 1811</u>	<u>(415) 244-2554</u>
<u>RICHARD POWELL</u>	<u>NAVY</u>	<u>(415) 244-2555</u>
<u>JULIE CARVER</u>	<u>NAVY - CODE 1811</u>	<u>(415) 244-2557</u>
<u>Romy F. Fuentes</u>	<u>DHS / Region 12</u>	<u>(415) 540 3815</u>
<u>MARY LUCAS</u>	<u>HLA</u>	<u>899-7350</u>
<u>ASHOK VERMA</u>	<u>HLA</u>	<u>899-7386</u>
<u>Gary Welshans</u>	<u>PRC</u>	<u>543-4880</u>
<u>Enir Utush</u>	<u>PRC</u>	<u>11</u>
<u>Randal Friedman</u>	<u>COMNAVBASE</u>	<u>395-3916</u>
<u>Cathy Gardiner</u>	<u>BREITEL FOR EPA</u>	<u>768-2766</u>
<u>Chuck Higgo</u>	<u>EPA</u>	<u>214-2388</u>
<u>Mark Malinowski</u>	<u>DHS</u>	<u>540-3816</u>
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**DHS PROPOSED AGENDA
FOR HUNTERS POINT MEETING
Friday, December 14, 1990 - 0900
DHS 3rd floor Conference Room**

- I. PA Other Areas/Utilities: Regulatory comments and concerns.
- II. WESTDIV Project Manager coordination and task assignments.
- III. Status of PPY Air Modeling.
- IV. Status of Oil Reclamation Ponds.
- V. Status of Environmental Sampling & Analysis Plan
- VI. Removal Action Plans and Specifications, WESTDIV discussion of approach and presentation.
- VII. Six month outlook. What is scheduled for the next six months.
- VIII. Discuss presentation of IR-6, 8 & 9 sampling data after the second round of groundwater sampling.

Possible general discussion of regulatory recommendations on first round of groundwater sampling for IR-6, 8 & 9.
- IX. Other

On December 20, 1990 a meeting was held between the Navy, the California Department of Health Services (DHS), California Regional Water Quality Control Board (RWQCB), United States Environmental Protection Agency (EPA), and Harding Lawson Associates (HLA) to discuss agency comments regarding revisions to the analytical program for the second round of groundwater sampling at Sites IR-6, IR-8, and IR-9 at Hunters Point Annex (HPA). The Navy's recommendations for revisions to the analytical program for the second round of groundwater sampling at Sites IR-6, IR-8, and IR-9 are presented in letters from HLA dated December 6, 1990. The enclosed comments on the December 6, 1990 letters were received from DHS.

Other items discussed include reporting procedures between the second and third rounds of groundwater sampling; submittal of the summary of findings memorandum for Operable Unit (O.U.) II; the Navy's plans for evaluating removal of free product at the Oil Reclamation Ponds (Site IR-3); the scheduled meeting to discuss the Navy's approach to revising the environmental sampling and analysis plan (ESAP); storm water sampling; and the schedule for submittal of the air sampling report addendum.

This document is a summary of each item discussed during the December 20, 1990 meeting. As agreed upon by the Navy and regulatory agencies, a formal response to comments received regarding the December 6, 1990 letters will not be required, the responses to the comments will be documented in this meeting summary and addressed in the summary of findings memorandum for each site as appropriate.

1. Attendees: See attached
2. Site IR-6: The agencies concurred with the recommendations for Site IR-6. The agencies questioned why a PVC bailer was used to purge the wells at this site; a Teflon or stainless steel bailer is specified in the Quality Assurance Project Plan (QAPP). HLA will check on this. The groundwater samples were collected with a stainless steel bailer.

The EPA also commented that the QA/QC summary statement on page 6 of the letter was worded too strongly because it states that the analytical data are of good quality. It should state the analytical data are generally of good quality because not all of the relative percent differences were within acceptable limits for the duplicate samples analyzed.

3. Site IR-8: Based on the presence of semivolatile organic compounds (SOCs) in the soil at Site IR-8 the agencies requested SOCs be retained in the analytical program. HLA recommended analyses of these compounds by method 8310 which will provide better detection limits than GC/MS methods. This method includes most analytes detected in the soil and can probably be modified to include all. The agencies concurred with this recommendations provided that all of the SOC analytes detected in the soil will be identified by the analytical method selected. Assuming that phthalates are identified in the samples because of laboratory contamination, it is acceptable to the agencies to delete phthalates from the analytical program. The EPA suggested investigating whether the sample bottles may be the source of some of the laboratory contaminants identified in the samples.

The EPA also expressed concern that because of the long screened lengths at Site IR-8, low levels of PCBs, if present, may be diluted. They requested that discrete samples be collected from approximately one foot above the bottom of the wells before and after purging. It will be acceptable to analyze the first sample collected for PCBs only. The samples collected after purging should be analyzed for all analytes recommended.

4. Site IR-9: Based on the presence of SOCs in the soil at Site IR-9, the agencies requested that SOCs be retained in the analytical program for the second round of groundwater sampling. The DHS also requested that the analysis for cyanide be retained. The SOCs will be analyzed by method 8310 for the reasons identified above. Dibenzofurans are not on the normal list of analytes for method 8310. The DHS stated that because dibenzofurans were identified in soil samples at this site, they must be included in the analytical program. Phthalates will not be included in the analytical program because they are probably identified in the samples due to laboratory contamination. The EPA suggested investigating whether the sample bottles may be the source of some of the laboratory contaminants identified in the samples.
5. Reporting procedures between the second and third rounds of groundwater sampling: The agencies requested a meeting between the second and third rounds of groundwater sampling to discuss the results of the second round and whether revisions to the analytical program are necessary for the third round. A formal report submittal will not be required but tabulated analytical data should be provided.
6. Summary of Findings Memorandum: Several comments received regarding the December 6, 1990 letters will be addressed in the summary of findings memorandum for O.U. II. The DHS expressed concern that monitoring wells IR06MW23, 30, and 32 may not be constructed properly for the detection of floating hydrocarbons because the top of the screen may be lower than the water table. HLA stated that the wells were intended to have approximately three feet of screen above the water level. In these wells, the water levels rose more than expected after well installation. This will be evaluated in the summary of findings memorandum, and additional wells for the detection of floating hydrocarbons will be recommended if appropriate. The DHS stated that they will be requesting a properly screened well within the berm of the 50,000 barrel tank to evaluate the presence of free product in this location.

The DHS suggested a meeting between the Navy and regulatory agencies prior to the submittal of the summary of findings memorandum to discuss the major findings. At the meeting the agencies would expect to have cross sections and groundwater contours prepared for Sites IR-6, IR-8, IR-9, and IR-10 as well as a summary of the conclusions reached for each site and the rationale for any recommendations. The meeting was tentatively scheduled for February 13, 1990 at 9:00 am in the DHS offices. HLA informed the agencies that the summary of findings memorandum would include only the first and second rounds of groundwater sampling. No objections were expressed. The third round of groundwater sampling is expected to be completed during March 1991.

7. Oil Reclamation Ponds (Site IR-3): One oil sample from the oil reclamation ponds has been analyzed during the current investigation. The attached preliminary analytical results were provided to the regulatory agencies.

The Navy plans to investigate the recovery of oil at the oil reclamation ponds by bailing each well with product weekly for three weeks. After three weeks, the recovery of product will be evaluated and recommendations for consideration of remedial alternatives will be made. If poor product recovery is observed it is anticipated that remediation would be deferred until the feasibility study is complete. If product recovery is good, then interim remedial options would be considered. The RWQCB would like to see the options of using a trench or wells as a passive recovery system evaluated.

The oil produced by the bailing will require disposal or treatment as hazardous because it contains Aroclor 1260 at 84 parts per million. The DHS suggested that the oil could be added to the sludge in Tank S-505 and treated or disposed as part of the removal action planned at this site. No objections were expressed by the regulatory agencies.

8. **Environmental Sampling and Analysis Plan:** The ESAP will be discussed at 11:00 am on January 10, 1991 after the Technical Review Committee meeting. The Navy requested that the agencies which provided comment on the plan be present at the meeting so that concurrence on the approach to the plan revisions may be reached. The EPA said that this should not be a problem. The RWQCB stated that the overall objectives of the ESAP are not well stated in the plan.
9. **Storm Water Sampling:** The Navy informed the regulatory agencies that the Storm Water Sampling was completed on December 14 and 15, 1990.
10. **Addendum to Air Model Report:** The addendum to the air model and risk assessment report prepared in support of the removal actions at the Tank Farm and Pickling and Plate Yard will be submitted to the regulatory agencies by January 10, 1991. It will be submitted to the public at the same time as the regulatory agencies and subject to the review procedures established in the Federal Facility Agreement for primary documents.