



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, Ca. 94105

January 14, 1991

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

Dear Mr. Sarmiento:

As discussed in our December 14 meeting with WESTDIV, EPA believes there are a number of areas at Hunters Point Annex which need additional consideration beyond that provided in the **Preliminary Assessment for Other Areas/Utilities Report ("PA")**. We have based this list on a review of past documents, a review of aerial photos (copies of which have been provided to Richard Powell at WESTDIV), and other information available to us. In addition to the list of buildings and areas which is being submitted separately by the Department of Health Services, please address the following concerns.

1) Aerial photos show stains at both ends of Building 530 (automobile workshop) starting in 1956 and continuing through 1973. This stain does not show up in photos taken in 1986. The SW portion of the stain is 40 ft NE of Site No. 9, PA-16. The other stain is at the opposite end of the building. The two stains may be a single continuous stain extending under Building 530. (The PA has recommended "no action" for this area.)

2) Aerial photos show a possible oil stain west of Building 371 (equipment storage) starting in 1965. (The PA has recommended "no action" for this area.)

3) In a 1965 aerial photo, there seems to be a transformer pad with a stain on the asphalt around it, 150 feet west of Building 230. In this area, there is also a circular structure indicated in dotted lines on some of the facilities drawings. There is a similar sized circular mark on the asphalt in some of the photos. If this is indeed an old transformer pad, leakage of PCBs may have occurred. (We note that this may instead be an underground tank.)

4) There is a stain on the asphalt at the north entrance of Building 231 in aerial photos taken between 1965 and 1990.

5) There is a stain on the asphalt between Building 272 and Building 271 in aerial photos taken between 1965 and 1990.

6) There are stains on the paving east of Building 270 in aerial photos taken between 1965 and 1990.

7) Aerial photos show stains on the paving west of Buildings 252 and 214.

8) A 1973 aerial photo shows a stain north of Building 258 (pipe fitters shop) in what is now the scrap metal yard.

9) An former Harding-Lawson employee has advised us that the Building 503 PCB spill may have been the result of a broken underground pipe which had been carrying contaminated oil, rather than leakage from transformers at Building 503. This person believes the pipe was abandoned in place without decontamination. The PA mentions this pipeline on page 41 and Plate 13, but does not implicate it in the PCB spill, and suggests a different route for the pipeline, but with similar end points.

It was reported to us that the pipeline started at the northwest corner of Berth 15 and ran along Manseau Street to Hussey Street, then 350 feet along the west side of Hussey (to the vicinity of the spill), then south the H Street, and finally southwest along H Street to the vicinity of the Power Plant (exact end point is unknown). There may be another PCB spill associated with the north end of the pipe. (This is a possible route for a pipe as there is aerial photo evidence that underground construction did occur along this route.)

The area around Berth 15 has been paved since 1956. There is a discoloration visible in a 1965 photo and later photos between 120 and 320 feet SW of Berth 15. The discoloration is visible because of a sharp change in color aligned with the end of Berth 14, but the color difference may be an artifact of different paving materials.

10) We have also been informed that Building 906 was used for storing and mixing of pesticides, and that pesticides were "dumped" on the slope between Buildings 906 and 102. A 1965 aerial photo shows a path leading past a barren patch of soil behind Building 102 which could be the result of an herbicide release. A 1990 photo shows an area of soil in the same region with different color and scarce vegetation. The PA suggests pesticide spills near Building 906, but Table 13 of the PA recommends Building 102 for only an asbestos program.

11) The catch basin in Building 411 is surrounded by very large presses, rollers, and transformers, many of which have leaked oily material, possibly including PCBs, onto the floor and into the catch basin. Thus, PCBs may also be in the soils around these drains.

12) The Navy facility drawings which Emcon used as the base map for various maps in its "**Verification Step Plan of Action**" show several transformer slabs which are not mentioned in any of the materials we have reviewed. It is possible that at least some of these transformers leaked PCBs, contaminating local soil and the contamination was not recognized at the time the transformers were removed.

13) The inner chamber of the plate furnace south of Building 408 is composed of fire bricks. Such bricks often contain leachable chromium. Both environmental releases and disposal of bricks should be addressed.

14) Asbestos in enclosed or underground areas such as the steam/fuel pipe galleries is not addressed in current work plans. Tank removal contractors have noted asbestos lagging at the point where they cut pipes emerging from the galleries.

Differential settling in Building 411 has been observed to be causing various pipes to heave out of the brick flooring. Similar differential settling could rupture the pipe galleries and expose asbestos in the future.

We recognize that the Navy has explained the in PA that asbestos is being handled through an ACM removal program separate from the IRP (e.g., Section 1.2, page 2). Since asbestos releases are a matter appropriately addressed under CERCLA, however, EPA remains concerned with how the Navy's ACM program fits into the overall CERCLA program at Hunters Point. While we have seen some documents relating to ACM removal at IR sites subject to removal actions, we are not clear how the ACM program will account for asbestos problems which are not identified in the course of removal or remedial actions at IR sites. Clarification of the scope of the ACM program is needed.

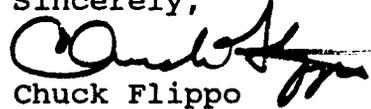
The 14 points raised above should be specifically addressed in either a revised PA, or another document which the Navy, EPA, and the State agree can serve as an alternative.

In addition to these specific concerns, EPA is concerned about the adequacy of the "building-by-building" approach embodied in the PA. The studies recommended in the PA, along with the additional ones recommended here and by DHS, may identify those contaminated areas based on **known or suspected activities** at HPA. There remain, however, a number of areas of the facility excluded from further study because there is no information

suggesting a problem. Some earlier studies present a limited amount of sampling data for some of these areas. We are still considering whether we believe this earlier data is sufficient, or whether some additional sampling program for areas not addressed in currently-planned RI or SI studies may be needed.

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,



Chuck Flippo  
Remedial Project Manager

cc: ~~Louise Lew, WESTDIV~~  
Mark Malinowski, DHS  
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