



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

Commanding Officer
Naval Facilities Engineering Command
Western Division
ATTN: Louise Lew (1811)
PO Box 727
San Bruno, CA 94066

FEB 26 1991

Dear Ms. Lew:

EPA has reviewed the list of Potential Exposure Pathways for the Hunters Point Annex Public Health and Environmental Evaluation (PHEE) Report, which was distributed at the January meeting of the Technical Review Committee. We have the following comments.

1) In general, given the uncertain future of land use at Hunters Point, exposure scenarios in the PHEE should assume residential use.

2) Page 1, fifth bullet. The definition of "non-potable" must conform to the definition used by EPA and the Regional Water Quality Control Board.

3) Page 1, last two bullets. The lack of "current recreational use" of the Bay near HPA must be documented. The fact that HPA land is fenced off does not in itself prevent recreational use of Bay waters potentially affected by the site. If there are institutional controls which preclude recreation in the area, the effectiveness of these controls needs to be evaluated before this pathway can be eliminated from consideration.

4) Page 2, second bullet. The PHEE will need to address the food chain pathway, although the conclusions of this discussion will likely hinge on the findings of the ESAP.

5) Page 3, third bullet. "Inhalation of volatile chemicals in indoor air from soil and/or ground water" is eliminated from consideration on the basis of "limited indoor use." Airborne contaminants may accumulate in buildings and present a more significant inhalation risk than outdoor air. What is meant by "limited indoor use" and what is your basis for projecting recreational use in a future use scenario? This must be further clarified and justified. A future recreational use scenario should be as realistic as possible.

6) Page 3, penultimate bullet. The comment is "Assumes dust emissions of adsorbed chemicals no airborne soil particulates." (Emphasis added.) We assume "no" is a typo which should read "on;" otherwise, this assumption does not make sense.

7) Page 4. Exposure pathways are presented for situations in which ground water is used for "domestic purposes" (bullets two and four). Yet in bullet three, ingestion of ground water is not to be considered because it is "nonpotable, not a domestic water source." This apparent discrepancy between the potential use of ground water for some domestic purposes (e.g., showering) but not others (drinking, cooking) needs to be further explained. Also, we assume the reference to nonpotable water refers to the shallow unconfined aquifer in the fill material. Hydrologic connections with the deeper confined aquifer are not well understood at this point. Therefore, we do not believe that ground water beneath the site can be eliminated as a potential future source of drinking water without further justification. See also comment number 2.

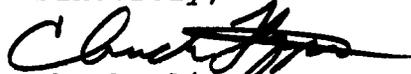
The following comments address the assumptions presented at the bottom of page 4:

8) Given that there is a park opposite the shoreline along IRs 1, 2 and 3, Assumption #1 that there is no current recreational use of bay waters in the vicinity of HPA is questionable. See also comment number 3.

9) Assumption #4, that HPA will not be used for growing fruits and vegetables, is not acceptable given the potential for residential development of HPA in the future. Private and neighborhood gardens should be considered in the future use scenario.

If you have any questions, please call me at (415) 744-2388.

Sincerely,



Chuck Flippo
Remedial Project Manager

cc: Mark Malinowski, DHS
Tom Gandesbery, SFRWQCB
Scott Lutz, BAAQMD
David Wells, SFPD