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HUNTERS POINT  
SSIC NO. 5090.3

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street  
San Francisco, Ca. 94105**

May 21, 1991

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

Dear Ms. Lew:

Enclosed are EPA's comments on the **Summary of Findings Memorandum (SFM)** for **Operable Unit II Sites** at Hunters Point. Our comments are presented in two attachments as follows:

**Attachment 1.** General comments and comments concerning the recommendations presented in the report.

**Attachment 2.** Specific comments and editorial remarks.

In accordance with the nature of the SFM, our comments do not reflect a detailed technical evaluation of all the data presented in the report. We hope that, as the remaining work at OU II is conducted and preparation of the RI Report begins, we can provide additional review as data becomes available and as data validation is completed. In the meantime, we feel the Navy has made considerable progress, and that much of the work involved in preparing the RI Report can proceed.

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

Sincerely,

A handwritten signature in cursive script that reads "Chuck Flippo".

Chuck Flippo  
Remedial Project Manager

cc: Eddie Sarmiento, NSTI  
Bill Brown, DHS  
Tom Gandesbery, SFRWQCB  
Scott Lutz, BAAQMD  
David Wells, SFPHD

EPA COMMENTS ON SUMMARY OF FINDINGS MEMORANDUM FOR OU 2:  
GENERAL COMMENTS

General Comments:

1. We agree the additional work proposed in the SFM should be conducted, though there may need to be some "fine tuning" of the specifics. (See comments below.) We also feel, however, that the information presented is generally adequate to begin the work of interpreting it for the RI and the PHEE. Though the schedule on Plate 34 seems to suggest otherwise, the start of work on the RI and PHEE reports need not wait on the additional data. EPA will need further explanation or the basis for the proposed schedule in considering any extension requested under the FFA.
2. We assume the text, tables, and illustrations will serve as the basis for the RI Report. As such, they should be as complete and correct as possible. Information which does not currently appear, but which may be useful, should be included. (E. g., the location of the two transformers on power poles cited in the first paragraph of Section 2.1.1, page 3, are not on Plate 2.)
3. Again, assuming this document will serve as the basis for the RI Report, the document should be edited for clarity and accuracy, as part of the RI preparation if not before. The basis for interpretations or assumptions stated in the text of the RI will need to be clearly established. Also, statements made in the text need to be checked for consistency with the data. For example, in the middle of page 7 the statement is made that PCBs over 1 mg/kg were detected in only one boring at IR 8. However, borings 4 and 7 also exceeded 1 mg/kg. See Attachment 2 for additional specific comments.
4. Metals concentrations are compared to "preliminary background levels" which are taken from the Background Sampling Plan. The SFM does not, however, address how or when the statistical evaluation planned in the Background Sampling Plan will be conducted and incorporated into the OU II RI process.
5. Has consideration been given to whether the bedrock is fractured, and what significance that might have for characterization of the hydrogeology?
6. When will the validation of the data presented in the SFM be completed?

Comments on Recommendations

**General:**

7. It is consistently recommended that tidal influence be evaluated, yet the Tidal Influence Monitoring Plan (TIMP) developed separately is not referenced. The relationship between the additional work being recommended and the TIMP should be explained. If the TIMP is to provide this additional work, the schedule for implementing the TIMP should be addressed.

**IR 8 (Section 5.1.2):**

8. The second bullet at the bottom of page 46 addresses the PCB "hit" in boring IR08B016. We agree the lateral extent of PCBs needs to be defined. The existing data, however, suggest that it may be fairly localized; i.e., it does not appear to extend laterally to borings 30 and 31. Yet the proposed locations for new boring 43 and 44 are further away from boring 16 than are either 30 or 31. We suggest adding one or two borings closer to boring 16 (between 16 and the proposed locations of 43 and 44). In each of these borings, a sample should be taken around the .75 foot level, to compare to the sampling in boring 16.

9. We note that the highest concentrations of 1,1,1-TCA appear "upgradient" of IR 8. Could this suggest some source beyond the area of IR 8? The samples from additional boring 46, which is proposed to go in just beyond the borings with the highest TCA levels, should also be analyzed for VOCs. If higher VOC levels are found in that direction, a more thorough investigation should take place (perhaps as part of the Sampling Investigations for the Other Areas/Utilities).

**IRs 6 and 10 (Section 5.3.1 and 5.3.2):**

10. In the 4th bullet on page 52, the text says wells 46A should be northeast of existing well 35A, while Plate 22 shows well 46 northwest of well 35A. Which is it?

11. Given the description of ground water gradient based on the water elevations, what is the rationale for placing additional well cluster #29 on Plate 22 if they are to be "downgradient" of well cluster 13A? (See 4th bullet, page 52.)

12. How will the downgradient extent of any ground water contamination emanating from Building 123 be determined? Is it assumed that new wells 44 and 45 will determine this? (That is not identified as one of the purposes of these wells.) If so, they should be monitored for hexavalent chromium as well as the other parameters identified. Alternatively, or in addition, a well between buildings 123 and 134 (e.g., near boring IR10B006, perhaps), directly downgradient of Building 123, may be useful.

TECHNICAL REVIEW OF SUMMARY OF FINDINGS MEMORANDUM (SFM): OU II SITES,  
NAVAL STATION, TREASURE ISLAND, HUNTERS POINT ANNEX

COMMENT NO.

1. SECTION 1.0, Page 1, Paragraph 2: To avoid possible confusion, when "Work Plan Volume 2B Sampling Plan- Group II Sites" is cited, an explanatory note should be included to indicate that site IR-11 is now included with Group V sites and, therefore, is not included in this SFM.
2. SECTION 2.1.1, Page 3, Paragraph 2 and Plate 2: The reader is referred to sample locations 2A and 2R on Plate 2; however, there does not appear to be a location 2R on the plate, while location 2A appears twice.
3. SECTION 2.3.1.5, Page 9, Paragraph 1: Change 2-butanone in the text to methyl ethyl ketone to be consistent with reporting in Appendices D, E, and F, and in the related tables. Subsequent references to this volatile organic compound (VOC) should be changed also.
4. SECTION 2.3.1.7, Page 10, Paragraph 2: In first sentence, change "organic" to "inorganic".
5. SECTION 3.3.1.3, Page 19, Paragraph 1: The second sentence in the paragraph refers to Delta-BHC concentrations in samples collected from "IR09B023..., respectively". Reference to boring IR09B014 for the first value has been omitted. Also, depths at which the samples were collected is not discussed.
6. SECTION 3.3.1.6, Page 20: Even though it is clear that this subsection is part of soil analytical results, it would be appropriate to change the sentence under this subheading to read that cyanide was not detected in any soil samples. As cyanide was detected in ground-water samples, this would reduce confusion should this sentence be taken out of context.
7. SECTION 4.3.1.2, Page 36, Top of page: The following sentence was unclear upon first reading and represents the first time that this construction is used: "TOG is defined to less than 500 mg/kg areally at the rest of the site." Subsequent sections made clear that the meaning was that the areal distribution of TOG in soil, at concentrations greater than 500 mg/kg, had been defined. This sentence, and subsequent descriptions of areal distribution of contaminants, could be better worded to aid the readers understanding.
8. Also, the criteria for limiting definition of areal extent of TOG to concentrations greater than 500 mg/kg is not explained.
9. SECTION 4.3.1.4, Page 38, Paragraph 2: The discussion of dibenzofuran does not indicate the areal distribution of this

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- compound, whether it was found in samples from closely-grouped or widely-spaced borings and surface soil sampling locations.
10. SECTION 4.3.1.4, Page 38, Paragraph 3: The discussion of phenol does not indicate whether it was found in samples from soil borings or in surface soil and whether it was found in samples from closely-grouped or widely-spaced locations.
  11. SECTION 4.3.1.4, Page 38, Paragraph 5: The discussion of benzoic acid, etc, does not indicate where these compound were found.
  12. SECTION 5.1.1, Page 45, Bullets 2 and 3: The concentration units are inconsistent (i.e., . mg/kg, ppm).
  13. SECTION 5.1.2, Page 47, Bullet 3: Reference to "unknown chromatograms" should be changed to "chromatograms with unknown hydrocarbons" or a similar phrase.
  14. SECTION 5.2.2, Page 49, Bullet 5: It is not clear how the location for proposed well IR09MW44A will be determined in order to assure that it is downgradient of IR09MW35A.
  15. SECTION 5.3.1, Page 50, Bullet 7: The concentration units are inconsistent (i.e., . mg/kg, ppm).
  16. Table 25: There appears to be an error in the number of samples/borings with arsenic concentrations above background: Range of background is given as 2.7 to 7 mg/kg, maximum detected concentration is given as 56.6 mg/kg, but no samples are reported as above background.