

5090
Ser 1811RP/00771
1 8 JUL 1991

From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: SUMMARY OF FINDINGS MEMORANDUM, OPERABLE UNIT 2,
NAVAL STATION, TREASURE ISLAND, HUNTERS POINT ANNEX

Encl: (1) Response to comments on Subject Document

1. In accordance with the Federal Facility Agreement for Naval Station, Treasure Island, Hunters Point Annex, enclosure (1) is forwarded in response to comments generated during the review of subject document.
2. 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).
3. By copy of this letter, this document is also being provided to other concerned regulatory agencies.

~~Original signed by~~

MICHAEL A. MIGUEL
By direction

Distribution:

U.S. Environmental Protection Agency (Attn: Chuck Flippo)
California Department of Health Services (Attn: Bill Brown)
Regional Water Quality Control Board (Attn: Steve Ritchie)

Copy to:

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)
Bay Conservation and Development Commission (Attn.: Nancy Wakeman)
U.S. Dept. of the Interior (Attn: Bill Allen)

Blind copy to: (w/o encl) 09B, 09CPB, 09A2A.43, 24, 1811, 1811JC, 1811RC
HLA (Attn: Ashook Verma), PRC (Attn: Gary Welshans), PWC S.F. BAY (Code 420)
(w/encl) COMNAVSEASYSKOM (Attn: Robert Milner), Admin. Record, 1811RP
COMNAVBASE S.F. Writer: Richard Powell, Code 1811RP, x2555
OIC Treasure Island, HPA Typist: B. Palmer, 17 July 91, Operable #00771
NAVSTA Treasure Island File: HP/DOHS



June 4, 1991
Agency Meeting Summary
Hunters Point Annex
San Francisco, California
Page 1

Attendees

Bill Brown, DHS
Lynn Nakashima, DHS
Chien Kao, DHS
Chuck Flippo, EPA
Cathy Gardinier, EPA
Grant Ohland, HLA
Beth Price, HLA
Ashok Verma, HLA
Emir Utush, PRC
Richard Powell, WESTDIV

Agenda

The meeting was held at the DHS office in Emeryville on June 4, 1991 to discuss the revisions to the trenching plan at the OU I sites and the Summary of Findings Memorandum (SOFM) for OU II. The following notes summarize discussions during the meeting.

OU I Trenching Plan Revisions

The DHS and the EPA agreed with the Navy's modifications to the trenching plan at IR-2. Trenching at the baseball diamond will be extended southward to investigate potential sandblast materials observed in MW114A2. In addition, the DHS requested additional trenching in the area between Borings IR02B096 and IR02B166. Generally, implementation of the trenching program was left to the Navy's discretion with complete understanding that there may be several small pockets of sandblast material which will not be amenable to investigation with borings or trenches.

OU II SOFM Comments

The EPA has reviewed the SOFM for the OU II sites and concurs with the proposed steps described in the SOFM. The need for expediting the aquifer testing was discussed so that the RI, the PHEE, and the FS reports could be submitted in a timely manner.

The DHS and Regional Water Quality Control Board (RWQCB) had not submitted a formal response to the OU II SOFM prior to the meeting. They agreed to do so in the near future. Tom Gandesbery, RWQCB, participated in the meeting by telephone. Verbal comments were received from both the DHS and the RWQCB. A detailed summary of discussions regarding EPA, DHS, and RWQCB comments is attached.

The EPA and DHS were generally satisfied with the level of detail presented in the OU II SOFM. The Navy proposed that the level of detail be reduced for future SOFM's due to scheduling constraints. The Navy proposed to reduce the number of illustrations (i.e., maps) and the level of detail in the text for future SOFM's. Working copies of

June 4, 1991
Agency Meeting Summary
Hunters Point Annex
San Francisco, California
Page 2

illustrations would be presented to the agencies in meetings along with a detailed explanation of the rationale for recommendations. SOFM text would be reduced to include an introduction, a summary of work performed, as well as recommendations and conclusions. The EPA and DHS did not provide a response to the Navy's proposal regarding the level of detail in future SOFM's.

Miscellaneous Items

The regulatory agencies do not want to review Volume II of the Removal Action Plans and Specifications. They are interested in reviewing Volume I, Work Plan.

The regulatory agencies felt that there is a need to implement interim remedial activities at the IR sites when high levels of contamination are encountered.

The DHS reported that they observed drums of oil, asbestos lagging, and old batteries in and around the Former Power Plant, Building 521. Richard Powell, WESTDIV suggests that the DHS contact Jim Sullivan, Environmental Coordinator at Treasure Island regarding cleanup of these items.

DISCUSSION OF AGENCY COMMENTS ON OU II SOFM

General Comments:

Both the EPA and DHS agreed that a contingency phase investigation needs to be performed.

A revised schedule for OU II activities including aquifer testing, background sampling, and tidal influence monitoring was presented. The statistical evaluation of the Background Sampling Plan should be completed in December, 1991 and the implementation of the Tidal Influence Monitoring Plan (TIMP) is scheduled to begin in August, 1991.

A presentation of OUII data validation results will be made at a TRC meeting after the validation is complete.

In response to the EPA comment regarding characterization of fractured bedrock at IR-6, the Navy proposed that three additional borings be cored into the bedrock to evaluate the possibility of fractures, and that these borings be converted into wells if groundwater is encountered.

June 4, 1991
Agency Meeting Summary
Hunters Point Annex
San Francisco, California
Page 3

Comments on Contingency Phase Recommendations:

IR-8

The Navy agreed to drill an additional boring between IR08B016 and proposed borings IR08B043 and IR08B044. In addition, it was agreed that samples from boring IR08B046 would be analyzed for VOCs due to the detection of 1,1,1,TCA in borings near the edge of IR-8. It was also agreed that if higher levels of TCA were detected in Boring IR08B046 additional investigation would be done under a different site investigation.

IR-6/IR-10

Clarification on locations of wells and borings was made. In addition, it was noted that the proposed locations shown on the maps in the SOFM may be changed after the review of additional water level measurements. Monitoring Well IR06MW44 will be installed between Buildings 123 and 134 to obtain groundwater data in the suspected downgradient direction of Building 123. Groundwater samples from Monitoring wells IR06MW44 and IR06MW45 will be analyzed for hexavalent chromium along with samples from other monitoring wells at these sites.

Specific Comments:

The Navy agreed that specific comments would need to be addressed in the RI Report. Only two specific comments were discussed in the meeting. These comments were on the criteria for limiting definition of the areal extent of TOG to 500 mg/kg and the location of IR09MW44.

The location of IR09MW44 will be determined after the installation of piezometers at IR09. These piezometers will provide additional information on the direction of groundwater flow

The investigative level of 500 mg/kg for Oil and Grease for OU II sites was also discussed. This level is based on HLA's experience at other contaminated sites and previous conversations with the DHS. The EPA stated that the investigative levels should consider the individual components of the Oil and Grease relative to the risk assessment performed in the PHEE.

The investigative level of 1 mg/kg for PCB's was also discussed. All parties agreed that risk assessments performed in the PHEE process are critical step in defining these investigative levels.

Several verbal comments made by the RWQCB and DHS were also discussed at the meeting. The RWQCB indicated that it was their understanding the analytes for groundwater analyses would be dropped only if the analyte was not detected in soil samples below the upper 0.5 to 1 foot or in groundwater samples. Based on this comment, the Navy agreed that TPH diesel should be added to the list of analytes for

June 4, 1991
Agency Meeting Summary
Hunters Point Annex
San Francisco, California
Page 4

the contingency phase at all OU II sites. Soil chemistry data will be reviewed to evaluate whether other groundwater analyses should be added to the contingency phase.

The RWQCB also expressed concern about the validation of chemical data. The Navy will inform the agencies when data validation is complete.

Several comments were made by the DHS which were similar to specific comments made by the EPA. The Navy agreed to address these comments in the RI Report.

Distribution:

Richard Powell, WESTDIV
Emir Utush, PRC
Beth Price, HLA
Ashok Verma, HLA
Grant Ohland, HLA