



March 12, 1992

To: DISTRIBUTION

Subject: NAVAL STATION TREASURE ISLAND, HUNTERS POINT ANNEX

Encl: (1) Response to DTSC, EPA and RWQCB Comments on the Draft Final Inspections: Sites PA-16 and PA-18 and Remedial Investigation Work Plan: Site PA-18, Naval Station Treasure Island, Hunters Point Annex, San Francisco, California, dated January 2, 1992

At the request of the Navy, we are forwarding for your review and comment enclosure 1 which is delivered in accordance with the Naval Station Treasure Island, Hunters Point Annex Federal Facility Agreement. Shortly, a separate letter regarding the transmittal of this document will be sent directly from the Navy.

Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Raymond K. Chiang, Code 1811RC, (415) 244-2554).

Submit written comments, if any, to Commanding Officer (Attn: Eddie Sarmiento, Naval Station Treasure Island, Bldg. 1 (Code 84), San Francisco, CA 94130), with a copy to Western Division, Naval Facilities Engineering Command (Attn: Louise T. Lew, Code 1811), 900 Commodore Drive, San Bruno, CA 94066-2402.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Gary Welshans'.

Gary Welshans, Sc.D., P.E.
Program Manager

GW:kk

DISTRIBUTION:

U.S. Environmental Protection Agency (Attn: Roberta Blank) (w/2 cys of encl)
Department of Toxic Substances Control (Attn: Bonnie Arthur) (w/2 cys of encl)
Regional Water Quality Control Board (Attn: Steve Ritchie)

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Copies to:

**Bay Area Air Quality Management District (Attn: Catherine Fortney)
California Department of Fish and Game (Attn: Mike Rugg)
U.S. Fish & Wildlife Service (Attn: Steve Schwarzbach)
National Oceanic & Atmospheric Administration (Attn: Mike Buchman)
Hunters Point Technical Review Committee Public Member (Attn: Rev. Arelious Walker)
Bureau of Environmental Health (Attn: David Wells)
San Francisco District Attorney (Attn: Steve Castleman)
Bay Conservation & Devel. Commission (Attn: Nancy Wakerman)
U. S. Department of Interior (Attn: William Allen)**

**Blind copy to: (w/o encl) 09CPB, 09A2A, 24, 1811, 1811RC
Harding Lawson Associates (Attn: Ashok Verma)
PWC S.F. BAY (Code 420)
(w/encl) Admin. Record (4 copies), COMNAVBASE S.F., OIC Treasure Island, HPA
NAVSTA Treasure Island, COMNAVSEASYSYCOM (Attn: Robert Milner)**

NAVY RESPONSES TO EPA GENERAL COMMENTS

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General Comments:

Comment No. 1:

By what mechanism will PA-16 be reevaluated when other studies needed to complete its review are available and what is the timeframe for this?

Response:

The status of Site PA-16 will be reevaluated by comparing the chemical concentrations detected in the soil and groundwater to established and agency-accepted background concentrations. The Draft Background Sampling Report is scheduled to be submitted to the regulatory agencies on March 16, 1992. A meeting to discuss issues pertaining to the results presented in the Draft Background Sampling Report will be scheduled for March 30, 1992. If the agencies concur with the proposed background levels on March 30, 1992, a report on the status of Site PA-16 will be submitted in three weeks, on April 20, 1992, to the agencies. Otherwise, the report finalizing the status of Site PA-16 will be submitted to the agencies three (3) weeks after concurrence on background values.

Comment No. 2:

What is the schedule for completion of the background sampling plan, and when will it be submitted for regulatory review?

Response:

See above response to Comment No. 1.

Comment No. 3:

It appears that you have not cited the latest EPA RI/FS or sample plan guidance on Page 48. The citation should refer to the Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim final, dated October, 1988 (EPA/540/G-89/004). The updated sample plan document is Preparation of a U.S. EPA Region 9 Field Sampling Plan for Private and State-Lead Superfund Projects, dated April 1990. The most recent guidances should be used.

Response:

The citation on page 48 will be changed to the correct and most current reference guidance.

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General Comments:

Comment No. 1:

It is mentioned several times throughout the response to comments that the PA-16 Site will be revisited after the completion of the ESAP, further RI investigations for nearby IR Sites and the completion of the Background Report. Please provide a schedule to ensure that PA-16 is adequately addressed following the completion of the above mentioned auxiliary documents.

Response:

The chemical conditions at Site PA-16 will be compared primarily to the background chemical concentrations. The results of the ESAP and other RI investigations near Site PA-16 will not be considered in determining the status of Site PA-16.

Results of other nearby RI investigations and the ESAP, however, will be reviewed to evaluate migration pathways at Site PA-16, if Site PA-16 is proposed for inclusion in the RI/FS program. Please see the response to EPA's General Comment No. 1 for additional details.

Comment No. 2:

The proposed schedule for PA-18 (Plate 8) is unacceptable. 15 weeks for laboratory analysis and 17 weeks for RI report preparation are excessive time estimates for field work of this scale. Please revise and resubmit.

Response:

The schedule for Site PA-18 will depend on further grouping of IR sites into Operable Units (OUs). A meeting between the Remedial Project Managers was held on February 21, 1992, to discuss grouping of sites in different OUs. After site grouping is completed, the schedule for the RI at Site PA-18 will be revised and resubmitted.

Comment No. 3:

The Navy shall investigate all sites based on the necessity to fully define the nature and extent of contamination existing at each of the Sites. Applicable standards for evaluating investigative levels of chemical concentrations in soil and groundwater shall be based on health based levels from a risk analysis. The Department will not provide guidelines for investigative levels.

Response:

Investigative levels will be determined based on either the background levels or health-based levels from a risk analysis. The Navy accepts DTSC's position on this issue.

Comment No. 4:

Well screen lengths shall generally be within 10 to 15 feet long. As previously agreed, any proposed screen length over 10 feet must have prior Department approval (22 February 1991 letter from the Navy to the Department regarding the Draft Sampling Plan). In general, any well with a screen length greater than 15 feet will be regarded as a preliminary investigative monitoring well.

Response:

HLA presented the rationale for the selection of screened intervals in a meeting on November 13, 1991. It was agreed that well screens longer than 10 feet could be used when appropriate. A Registered Geologist will make the decisions as to the appropriate screen length based on considerations such as vertical extent of the uppermost aquifer unit, likelihood of cross contamination, site-specific lithology and stratigraphy, thickness and continuity of low-permeability units, evidence of vertical gradients, and saturated thickness of aquifer units. In general, wells are designed to collect representative groundwater samples from identified aquifer units.

This issue was discussed further at the Technical Review Committee (TRC) meeting on December 4, 1991. At that time, DTSC expressed concern about possible dilution of contaminant concentrations resulting from vertical stratification. A verbal conversation between Grant Ohland of HLA and Cyrus Shabahari of DTSC indicated that the DTSC was satisfied with the criteria presented for the selection of screened intervals and that no further action was necessary.

NAVY RESPONSES TO RWQCB COMMENTS

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The following are the Navy's responses to comments by the California Regional Water Quality Control Board (RWQCB) on the Draft Final Site Inspections: Sites PA-16 and PA-18 and Remedial Investigation Work Plan: Site PA-18, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California. The RWQCB presented their comments in a letter dated January 22, 1992.

GENERAL COMMENTS:

Comment No. 1:

When will Removal Actions or Remedial Investigation Workplans be submitted for PA-16?

Response:

Removal actions or RI work plans will be submitted if Site PA-16 is recommended for inclusion in the RI/FS program.

Comment No. 2:

The question of whether or not the data gathered at PA-16 (and PA-18) may be appropriate for use as "background soil and groundwater chemistry" data (p.7) has not been resolved. In light of recent developments in the understanding of the contaminant distribution at HPA, specifically at OU-I, the assumptions that led to the original "Background Sampling Plan" approach to the determination of "background" concentrations of contaminants may no longer be valid. This approach may need to be revisited in order to evaluate which of the data collected from PA-16 (and PA-18) may be appropriate for use as so-called "background" data.

Response:

The question of whether or not background soil and groundwater chemistry can be established for Sites PA-16 and PA-18 has not yet been resolved. The Background Sampling Plan will not be completed until March 16, 1992. In general, soil and groundwater chemistry at any particular site may be considered background regardless of whether or not these contaminant levels pose an environmental or human health risk. Once background concentrations have been established for a site, further investigation in these areas may not be necessary; however, remedial measures may be necessary based on health-based or environmental risks.

Comment No. 3:

Where specific editorial changes are requested, such as in Comments 9, 10, 11, and 12, below, SFRWQCB staff has no objection to altering margins of the text, or other means, to avoid reproducing the whole text of the document, as a result of potential pagination changes due to incorporation of the requested language.

Response:

Specific Comments 1 through 12 will be addressed in the report on status of PA-16 at a later date. The Navy concurs with Comments 4 through 12.

SPECIFIC COMMENTS:

Comment No. 1

p. 7, Section 3.1, Bullet 3: See above, General Comment 2.

Response:

Background soil and groundwater chemistry near Site PA-16 will be addressed in the Draft Background Sampling Plan to be submitted March 16, 1992. Please see the response to RWQCB's General Comment No. 2 for additional details.

Comment No. 2

p. 17, Section 3.6, Paragraph 5: See above, General Comment 2.

Response:

Please see the response to RWQCB's General Comment No. 2.

Comment No. 3

p. 19, Section 3.6, Paragraph 6: The conclusion that "neither the measured concentrations or distribution of either antimony or arsenic suggest releases from potential sources associated with documented activities at the site" does not necessarily mean that these contaminants will not have to be cleaned up. If the contaminants pose a threat to the environment or to the beneficial uses of the waters of the State, these contaminants will have to be cleaned up.

Response:

The CERCLA program will evaluate the risk associated with the chemicals detected at PA-16, irrespective of whether PA-16 is recommended for additional investigations. A preliminary risk assessment will be performed at Site PA-16 if it is not recommended for the RI program. If the risks associated with background concentrations pose a threat to the environment or to beneficial uses of waters of the State, the decision to remediate or not to remediate will be made by the RPMs.

Comment No. 4

p. 20, Section 3.7, Bullet 10: The background concentrations have not been established at HPA for any metals or organics in soils, sediments or groundwater. The bullet should be modified to reflect that fact.

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The Navy concurs that background concentrations have not been established.

Comment No. 5

p. 21, Section 3.8, Bullet 4: See above, Specific Comment 3 and General Comment 2.

Response:

Please see responses to General Comment No. 2 and Specific Comment No. 3.

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pp.40 and 41, Section 6.3, Bullets 3 and 4: The text refers to shallow aquifer monitoring wells IR18MW21 and IR18MW22, but Plate 7 shows these wells as IR18MW21A and IR18MW22A. Please conform either the text or the Plate and submit corrected pages so that these may be inserted into the document.

Response:

Comment noted. Correct names for proposed monitoring wells are IR18MW21A and IR18MW22A.

Comment No. 9

p. 41, Section 6.4, Sentence 3: Modify to read, "...and the pH, conductivity, temperature and turbidity of the groundwater samples will be measured in the field."

Response:

Field measurements of groundwater samples will include the pH, conductivity, temperature and turbidity.

Comment No. 10

p. 44, Section 6.5.3, Insert the following after Sentence 5: "Field measurements of pH, conductivity, temperature and turbidity will be made and recorded for each sample."

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See response to Specific Comment #9.

Comment No. 11

p. 45, Section 6.5.4, Paragraph 2, Insert the following after Sentence 1: "Field measurements of pH, conductivity, temperature and turbidity will be performed and recorded for each groundwater sample."

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See response to Specific Comment #9.

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p. 49, Section 6.8.1, Add a new Sentence 4: "Variances from the proposed workplan will be documented with the 'Notification of Field Variance Form' to be submitted to the regulatory agency designees."

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