



November 19, 1992

To : DISTRIBUTION

Subject : NAVAL STATION TREASURE ISLAND, HUNTERS POINT ANNEX

Encl : (1) Final Summary Report of UST Removals (July through October, 1991), Naval Station Treasure Island, Hunters Point Annex, San Francisco, California.

On behalf of the Navy, we are forwarding the Final Summary Report of UST Removals at Hunters Point Annex. This report is being delivered in accordance with the Naval Station Treasure Island, Hunters Point Annex Federal Facility Agreement as a secondary document. The items discussed during a November 12, 1992 phone conversation between Ms. Bonnie Arthur of the California Department of Toxic Substances Control (DTSC) and myself, and the comments received from the U.S. Environmental Protection Agency and the California DTSC during the 60-day review period, have been incorporated in this revised document. The enclosed report dated November 18, 1992 constitutes the Final Summary Report of UST Removals (July through October, 1991).

Should you have any questions regarding these matters, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: William Radzevich, Code 1811WR, (415) 244-2555.

Very truly yours,

Scott Wald
Project Manager

SW:gb

Enclosures

DISTRIBUTION:

U.S. Environmental Protection Agency (Attn: Roberta Blank) (w/2 cys of encl)
California department of Toxic Substances Control (Attn: Bonnie Arthur) (w/2 cys of encl)
California Regional Water Quality Control Board (Attn: Dr. Barbara M. Smith)

Encl: (1) Final Summary Report of UST Removals (July through October, 1991), Naval Station
Treasure Island, Hunters Point Annex, San Francisco, California.

Copies to:

National Oceanic and Atmospheric Administration (Attn: Denise Kilmas)
U.S. Department of Interior (Attn: William Allen)
U.S. Fish & Wildlife Service (Attn: Steve Schwarzbach)
Agency for Toxic Substances and Disease Registry (Attn: Joan Davis)
California Department of Fish and Game (Attn: Mike Rugg)
Bay Area Air Quality Management District (Attn: Catherine Fortney)
Bay Conservation and Development Commission (Attn: Nancy Wakeman)
City and County of San Francisco (Attn: David Wells)
San Francisco District Attorney (Attn: Steve Castleman)
TRC Public Representative (Attn: Leslie Katz)
TAG Recipient (Attn: Sy Allen Browning)
NAVSTA Treasure Island (Attn: Jim Sullivan) (w/2 cys of encl)
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WESTDIV (Attn: William Radzevich - 11 copies)

ENCLOSURE

FINAL
SUMMARY REPORT OF
UNDERGROUND STORAGE TANK REMOVALS
(JULY THROUGH OCTOBER 1991)

DATED 18 NOVEMBER 1992

THIS RECORD IS ENTERED IN THE DATABASE AND FILED
AS

RECORD NO. AR_N00217_002662

**RESPONSE TO REGULATORY COMMENTS ON THE
DRAFT SUMMARY REPORT OF UST REMOVALS (JULY THROUGH OCTOBER, 1991)
NAVAL STATION TREASURE ISLAND, HUNTERS POINT ANNEX**

Part I - California Department of Toxic Substances Control Comments

General Comment 1: The Department recommends that the format of the report be revised. It would be more clear if the three sections, "Site-Specific Activities", "Sample Description and Analytical Results", and "Conclusions and Recommendations" were consolidated in each individual tank section.

Response 1: Based upon the November 12, 1992 discussion with Ms. Bonnie Arthur, the pertinent information from Section 6 has been added to Section 4.0. Also, the report has been reformatted in response to EPA's comment.

General Comment 2: The Department does not generally agree with the policy of collecting fewer samples than recommended in the workplan. As these samples may be important to document a "no further action" recommendation in a particular area, it is imperative that confirmational sampling is complete. Justification for decreasing the number of samples collected is required in the draft final of this report for the tanks for which a reason is not given [e.g. Tank S-435(1) and S-435(2)].

Response 2: As stated in the Summary Report, a representative from the local implementing agency (San Francisco City and County) was on-site to direct the sampling efforts. Furthermore, a representative for the DTSC was also on-site and concurred with the sampling strategy.

General Comment 3: Provide a comparison of the DTSC and Navy sample results.

Response 3: Table 20 has been added to the report and compares DTSC and PRC sample results.

General Comment 4: Soil gas results should be included in the report if applicable to the discussion (e.g. Tank S-251).

Response 4: Soil gas surveys were conducted during January, 1989. The results are provided in the Technical Report, Underground Tank Investigation, NAVSTA TI, HPA, dated December 7, 1989. A reference to this report has been added to Table 2.

General Comment 5: If prior data (such as soil gas) or field instrumentation indicate that VOCs are present, it is imperative that data collection be planned to prove/disprove the existence of contamination in these areas.

Response 5: Soil and groundwater samples were collected in a manner consistent with the California Code of Regulation, Title 23. A full suite of chemical analysis was performed on each sample and the sampling was directed by the local implementing agency and DTSC. The analytical data collected by PRC is sufficient to prove or disprove the existence of chemical contamination.

Specific Comment 1: Page 13, Tank S-251; Soil gas data located near this tank showed VOC levels as did the OVA readings (1.9 ppm), however, only 2 samples were taken, which did not indicate solvent contamination. Provide greater documentation to justify the conclusion that no contamination exists in this area.

Response 1: The soils surrounding this UST were excavated and disposed off-site. Two confirmation samples were collected and the analytical results indicated that no soil contamination exists at this site.

Specific Comment 2: Page 121, Tanks S-711, S-712, S-713, S-714; Please provide greater detail for when additional soil investigations are planned for these tanks.

Response 2: This is a summary report of the field activities and the corresponding analytical results. It is not appropriate in this report to develop schedules for further investigations. The schedule for further investigations will be incorporated with the current RI/FS activities.

Specific Comment 3: Page 122, Tank S-715; It is suggested that a risk analysis will be completed to leave soils in place. The format of the PA-16 risk analysis is acceptable, however, a schedule should be provided.

Response 3: See response to specific comment no. 2.

Specific Comment 4: Page 133, Tank-209; Clarify sentence stating "site should be conducted under the current RI/FS activities is not recommended at this time." If further investigations are not recommended further explanation should be provided.

Response 4: The sentence has been revised.

Part II - U.S. Environmental Protection Agency Comments

- Comment 1: Section 4.0 indicates that much of the metals data is "J" qualified (estimated). The significance of these qualified data and a discussion of corrective action, if necessary, should be provided in Section 5.0.
- Response 1: The significance of qualified metals data and a discussion of corrective action proposed is included in Section 5.1.5 of the report.
- Comment 2: Section 4.1.4 discusses the results of Department of Toxic Substances Control (DTSC) split sampling, but no comparison of DTSC results to Navy results is provided. A table compiling the relative percent differences between DTSC and Navy results should be prepared, incorporated into the report, and discussed in Section 5.0.
- Response 2: PRC has completed a comparison of the PRC and DTSC split sample results. However, PRC does not feel that it is appropriate to include the comparison in Section 5.0 (Data Quality Assessment) because of the unknown quality of the analyses performed at the DTSC contract laboratory. Instead the comparison is included in Section 4.16.9 for information purposed only.
- Comment 3: Section 6.0 of the report generally concludes that metals were not detected in soil and groundwater samples collected after removal of USTs. The data in Appendix C, however, contradict this conclusion. the nature, significance, and extent of metals contamination should be carefully addressed in Section 4.0.
- Response 3: Metal compounds that exceed the disputed background levels for metals in soil and groundwater, have been added to Section 4.0.
- Comment 4: The criteria for determining that metals have not been detected is unclear. For example, the lead and copper concentrations in sample S-714-S1 are 256 and 723 mg/kg, respectively. These concentration exceed the Navy's disputed background concentrations by factors of approximately 10 and 7, respectively. A discussion of the criteria used to eliminate metals from consideration should be provide in Section 4.0.
- Response 4: The metal compounds that exceed the disputed background concentrations have been added to Section 4.0.
- Comment 5: Section 6.1.1 states the detected quantity of fluorene is 2,000 $\mu\text{g}/\text{kg}$. Appendix C indicates fluorene was detected at a level of 2,200 $\mu\text{g}/\text{kg}$. The report should be carefully reviewed to eliminate this type of inconsistency.

Response 5: The report was double-checked to remove all inconsistencies such as the one reported for fluorene.

Comment 6: The organization of the report should be improved by combining the Section 4.0 and 6.0 discussion of contaminants. Section 6.0 should then be reserved for recommendations.

Response 6: The discussions of contaminants in Section 4.0 and 6.0 have been combined to improve the organization of the report. Section 6.0 contains the recommendations.