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HUNTERS POINT
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

April 12, 1993

Hank Gee
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Bldg. 101
San Bruno, CA 94066-0720

Dear Mr. Gee:

The U.S. Environmental Protection Agency has reviewed the Draft Alternative Selection Report, Operable Unit III, for the Hunters Point Annex site. Comments prepared by our representative, Bechtel Environmental Inc., are enclosed. We also refer you to the previous comments made by our Regional Toxicologist, Daniel Stralka, on the OU IV ASR (U.S. EPA letter dated February 22, 1993).

Please contact me if you have any questions regarding these comments at (415) 744-2385.

Sincerely,

A handwritten signature in cursive script that reads "Roberta Blank".

Roberta Blank
Remedial Project Manager

cc: Bonnie Arthur, DTSC
Barbara Smith, RWQCB

Bechtel

005 00731

50 Beale Street
San Francisco, CA 94105-1895

Mailing address: P.O. Box 193965
San Francisco, CA 94119-3965

April 5, 1993

Ms. Roberta Blank H-7-5
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Subject: ARCSWEST Program Contract No. 68-W9-0060
Hunters Point Annex Work Assignment No. 60-05-9PP3
Review of the Navy's *Draft Alternative Selection Report Interim-Action Operable Unit III* for the Hunters Point Annex

Dear Roberta,

As you requested, the Bechtel Project Team; Richard Draper, Dante Tedaldi, and Michele Emerson (ICF), has reviewed the Navy's *Draft Alternative Selection Report Interim-Action Operable Unit III* for the Hunters Point Annex. This Alternative Selection Report (ASR) is the third in a series. It concludes that no interim remedial action is required.

We have revised and resubmitted, as comments applicable to the OU III ASR, many of our comments developed in review of the two previous ASRs. The OU III ASR is inconsistent with the both the OU II and OU IV ASRs. As noted in earlier reviews, the three reports consider different sets of conditions prior to recommendation of an interim remedial action.

Our comments are attached. If you have questions please contact me at 768-3282.

Sincerely,



Richard Draper, Ph.D.
Project Manager
(415) 768-3282

cc: M. Mitguard, EPA
D. Morrison, EPA



Bechtel Environmental, Inc.

**Comments on the Navy's Draft Alternative Selection Report
Interim-Action Operable Unit III for the Hunter Point Annex**

1. The conditions that must be met prior to recommendation of an interim remedial action should be, but are not, consistent with those described in the alternative selection reports for OU IV and OU II.
2. The outline of this ASR is not consistent with the generic outline for ASRs presented to the EPA on September 22, 1992. Again, this series of ASRs should be consistent in level of detail, content, and decision making criteria. A particularly troublesome omission is discussion focused on the identification of, and compliance with, ARARs.
3. The definition and extent of point source contamination is based in part on the disputed background levels determined in the Navy's *Technical Memorandum, Background Soil and Groundwater Conditions*. A clear discussion including a flow chart illustrating decision points should be developed and included to illustrate how point sources of contamination were identified. The implications of using disputed background levels to determine point sources should be discussed.
4. Interim remedial actions, as described in the *Guide to Developing Superfund No Action, Interim Action, and Contingency Remedy RODS* (EPA/540/1-91/001), are limited in scope and only address areas or contaminated media that will also be addressed in a final operable unit ROD. The use of long-term effectiveness, including the ability to meet final action objectives, to evaluate interim action alternatives is inappropriate because of unresolved issues associated with background concentrations, ARARs, chemicals of concern, and the presence of adjacent un-investigated sites. The use of these criteria suggests the Navy may be viewing interim remedial actions as final. Please clarify.
5. This report should, but does not, include a complete operable unit conceptual model. This model should be a pictorial representation of all potentially complete exposure pathways and include; contaminant sources, potential contaminant sources under investigation in adjacent areas, exposure points, release mechanisms, transport media, and receptors. The limited nature of the proposed interim remedial action should be contrasted with the complete conceptual model.
6. This report does not assess whether current site conditions pose an immediate or long-term threat to existing environmental receptors. The report should be revised to delete references to environmental risk assessment.
7. A clear discussion including a flow chart illustrating decision points should be developed and included in the report to illustrate how chemicals of concern were identified.
8. Soil chemical concentration data have been compared to background levels on a lithology specific basis. Tables 11 and 12 should be revised to facilitate this comparison by reporting the average contaminant concentration, its associated standard deviation, and an assessment of the nature of the concentration distribution, e.g., coefficient of variance. Similar tables should also be prepared for the groundwater data.

9. Throughout the report there are inconsistencies related to the inclusion or exclusion of groundwater from consideration for interim action, please clarify. On page vii the text states that, "groundwater was not considered for interim action at the OU-III sites". On page 10 the text states that, "groundwater contaminants...that consistently exceed federal or state...levels or may exceed these levels in the future...are also considered for interim action". On page 38 the text notes that criteria for selection of interim action remedial units include ARARs, such as MCLs. However, on the following page the text states that, "groundwater at the site was not considered for interim action".
10. The report should briefly identify the potential adverse impacts or conditions which could result from implementation of each interim remedial action and describe the mitigation measures which are proposed for each action.
11. In the discussion of cost, the authors mention compliance with a San Francisco ordinance prohibiting development of drinking water wells. Specify this ordinance and provide details about its intent and applicability.
12. The impact of soil excavation below the water table should be more thoroughly addressed. Excavation within the saturated zone could increase mobility of contaminants in groundwater by solubilizing contaminants which would otherwise be adsorbed.
13. In Section 6.1 please provide an explanation and description of field activities designed to determine the vertical extent of the soil remedial unit. Also discuss the possible engineering limitations associated with excavation to depths greater than 3 feet.
14. Short term effectiveness should be defined and explicitly considered in the detailed analysis of interim action alternatives, Section 6.4.
15. The discussion of lead levels in Section 6.4.2 should be revised to state that soluble lead greater than 5 mg/L is considered high and a corresponding total lead concentration of greater than 1,000 mg/kg could be expected.
16. The soil sampling frequency of one sample per 50 cubic yards is inadequate to properly characterize the material and should be revised. See Sections 6.4.2 and 6.4.3.
17. The cost estimates in Appendix G should include: (1) a list of assumptions; (2) unit rates and quantities; (3) details related to transportation distances, costs for loading, tipping, and freight charges; (4) stabilization costs, if required, asphalt feed, capital costs of equipment, and associated operation costs; (5) separate engineering costs, regulatory costs, and associated assumptions; and (6) separate presentation of the NPV and O&M costs.
18. The report should clarify why O&M costs for groundwater monitoring are included in Alternative 1, but not in the other two alternatives. None of the three alternatives provide for groundwater remediation. Groundwater monitoring costs should be same for each of the three alternatives.
19. A more rigorous approach to describing exposure assumptions and intake parameters should be incorporated into the risk assessment. A more detailed explanation of site-specific exposure assumptions should be given.

20. The rationale for selection or exclusion of potentially complete exposure pathways needs to be presented explicitly. The pathways of exposure to chemicals in soil, recommended by the Department of Toxic Substances Control (DTSC), were soil ingestion and dermal contact. There also exists the possibility of a potentially complete exposure pathway due to inhalation of chemicals associated with dust particles. The exclusion of this pathway of exposure should be discussed.
21. The difference between the health-based levels (HBLs) and preliminary remediation goals (PRGs), see page A-15, is not clear. Essentially, the equations used to develop the HBLs and PRGs are the same as described in Risk Assessment Guidance for Superfund, Part B. To avoid confusion, the EPA terminology should be used.
22. The risk assessment text, page A-18, states that the current oral slope factor for benzo(a)pyrene reported in IRIS is $5.8 \text{ (mg/kg-day)}^{-1}$, however the value identified in Table A-9 is $7.3 \text{ (mg/kg-day)}^{-1}$. The text should be revised.
23. The risk assessment text, Section 5.0 page A-38, states that, "from a risk assessment standpoint, values [risk levels] that constitute a difference of less than an order of magnitude from the reference levels [target risk levels] should not be considered to be significantly different". In the context of an ASR, this statement argues that risk levels less than 10^{-3} and hazard level less than 10 are acceptable. This type of discussion of the uncertainties associated with risk assessment is misleading. It should be replaced by a scientific discussion of the uncertainties associated with risk assessment models, assumptions, and the propagation of these uncertainties.
24. Figures A-6 and A-7 should be, but are not, consistent with Figures A-7 and A-8 found in the OU-IV ASR. These figures should be incorporated into the body of the report.
25. Appendix D should provide an explanation of why 25% of the metal's data presented in Table D10 are J* qualified, i.e., significant deficiencies were noted in the data package.