

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
100 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737
(510) 540-3821

N00217.002730
HUNTERS POINT
SSIC NO. 5090.3



August 16, 1993

Mr. Ray Ramos
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Building 101
San Bruno, California 94066-0720

Dear Mr. Ramos:

**HUNTERS POINT ANNEX (HPA) DRAFT IR-3 TREATABILITY STUDY WORKPLAN
FOR TREATING SUBSURFACE PETROLEUM PRODUCTS**

The Department of Toxic Substances Control has reviewed the above report and forwarding comments. The Regional Water Board's comments are enclosed for your consideration as well.

The Department does not approve of any cleanup levels when conducting a pilot study. However, to facilitate the cleanup process using target levels might be suitable so long as procedures and methodologies at arriving those values are provided and agreed upon.

The Navy needs to explain how they have arrived at the proposed target level of 10,000 ppm TPH for diesel in soil and sediments. Although the ASRs discuss the procedure, but it is necessary to establish that a removal action is temporary and thus if the overall risk assessment study necessitates a remedial action, the Navy must go back and undertake a remedial action at the site.

The report identifies the existence of LNAPLs above and below the water table, but it only focuses on the above water portion of free product. The Navy needs to explain how the contamination below the water table will be addressed

The screening alternatives are preempted by selection of bioremediation. Please explain how the Navy intends to study alternatives when it has already chosen the bioremediation as the remedy.

The report indicates that monitoring wells did not sustain any pumping. Please explain how you are going to treat the free product ex-situ. Please explain why ex-situ bioremediation has been selected.



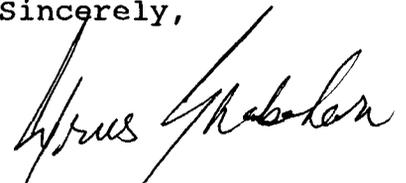
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SPECIFIC COMMENTS:

1. Page 4, top paragraph, please identify these four wells.
2. Page 5,
 - a. Paragraph 1, please explain how the treatability study will be preformed, if you are screening for remedy.
 - b. Paragraph, 3, please explain the process involved in the remedy selection testing. What kind of tests will be done? What is the area of concern for soil testing? And to what depth?

Should you have any questions regarding this letter, please call me at (510) 540-3821.

Sincerely,



Cyrus Shabahari
Project Manager

Enclosure

cc: US EPA
Region IX
Attn: Roberta Blank, Mail Code H-9-2
75 Hawthorne Street
San Francisco, California 94105

Regional Water Quality Control Board
Attn: Barbara Smith
2101 Webster Street, Suite 500
Oakland, California 94612