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HUNTERS POINT
SSIC NO. 5090.3

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Ser T4E1/L4002
23 Nov 1993

Ms. Julie R. Anderson
Chief, Federal and Technical Programs Branch
United States Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Ms. Anderson:

This is to acknowledge receipt of your November 12, 1993, letter identifying six (6) listed issues pertaining to your review of our Draft Final Parcel A Site Inspection (SI), and your notifying me of your intention to engage in dispute resolution regarding your issues. You indicate that dispute resolution should begin with informal negotiations at the project manager level immediately. I have directed our project manager for Parcel A, Mr. William Radzevich to contact Mr. Ray Seid to initiate discussions as soon as is practicable.

In that Mr. Ray Seid is a recent replacement for Mrs. Robert Blank as your single remedial project manager (RPM) and member to the Base Closure Team (along with Mr. Cyrus Shabahari from the State of California and myself as the BRAC Environmental Coordinator) it should be noted that at Hunters Point we have the following project managers with whom Ray should establish a working liaison to create more effective team communications, and to assist in our goal of expediting and improving environmental response actions in order to facilitate the disposal and resue of this BRAC installation, while protecting human health and the environment:

Parcel E
OU I and V
Groups 5 and 6
Ecological Assessment (ECA) and ESAP (Basewide)
Tidal Influence Monitoring Plan (TIMP) (Basewide)
Sandblast Grit Removal Action (Basewide)

Mr. Dave Song
Code T4E1DS
415-244-2561

Radiation Issues (Basewide)
Formerly Used Defense Sites (FUDS)

Mr. Mike McClelland
Code T4E1MM
415-244-2539

Parcels B and C
OU II and IV
Tank Farm Removal Action
Groundwater Monitoring (Basewide)
Air Sampling (Basewide)
Ambient Determination (Backgrounds - Basewide)

Mr. William McAvoy
Code T4E1WM
415-244-2554

Parcels A and D
OU III
Tank S-505 Removal Action
Pickling and Plate Yard Removal Action
UST Removals
Onsite Soil Treatment

Mr. William Radzevich
Code T4E1WR
415-244-2554

To assist in the informal dispute resolution process between your agency and us, I offer the following comments specific to your six listed issues:

(1) We will on the Final SI expand our text to discuss as to what is different about the two sampling efforts that TCE was detected in the first round and not in the second. We believe that this discussion should provide sufficient basis for a no further investigation conclusion.

(2) EPA comment #4 related to "connection" to which our response was specific and adequate. It should be noted that if "connection" is not an issue then possible contaminant is not an issue.

(3) We still feel our conclusion was based on adequate evaluation. We appreciate Roxy Barrett wants to look for herself, but I want to make it clear that there must have been a misunderstanding, for we consider our assessment complete and not dependent on an evaluation by Roxy Barrett. We would like to be provided a copy of Roxy's evaluation, so we may consider it for incorporation into our basewide ecological risk assessment.

(4) The method we used is considered even more technically conservative than the California Leadsread Model and would not affect our conclusion; otherwise, use of either method would have resulted in the same conclusion.

(5) We were of the opinion that because of the "investigation by excavation" that sources of sediment of concern is no longer a concern that sediment from Parcel A would no longer be a concern. Further, the storm drains in Parcel A by work plan were to be sampled, but at the sampling point called for in the work plan there weren't sediments of sufficient quantity for a sample to be taken. We are currently pursuing a

routine maintenance cleaning of the storm drains in Parcel A and will advise you of the schedule once we have made arrangements.

(6) We agree that the transfer document issue should be resolved prior to transfer of Parcel A, but this is an issue not directly related to the adequacy of our SI document.

We sincerely hope that we can resolve your dispute and that it doesn't impede timely reuse of Parcel A. I can be reached at (415) 244-3580 for discussion of these matters. Hopefully, these matters can be resolved on an informal basis.

Sincerely,

Original signed by:

RAYMOND E. RAMOS
BRAC Environmental Coordinator
Hunters Point Annex
By direction of
the Commander

Copy to:

CO NAVSTA Treasure Island and Hunters Point Annex (CAPT Berns)
COMWESTNAVFACENGCOCOM (CAPT Dillon)
Base Transition Coordinator, COMNAVBASE Treasure Island (CDR Elkins)
State of California Department of Toxic Substances Control, Region 2
(Attn: Cyrus Shabahari)
California Regional Water Quality Control Board (Attn: Barbara Smith)
San Francisco Dept. of Public Health (Attn: Amy Brownell)

Blind copy to:

T4, T4A, T4E1, T4E1WR, T4 (Roger Gee, Community Relations), 09CMN,
09CT4, 09E, 09EE, 24, 09F2, PRC (Attn: Gary Welshans), Admin Record (3 copies)
Chron, Blue, Pink, Green
File: HPA/IR