



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
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November 12, 1993

Mr. Raymond E. Ramos
BRAC Environmental Coordinator
Western Division
Naval Facilities Engineering Command
900 Commodore Dr.
San Bruno, CA 94066-2402

Dear Mr. Ramos:

The U.S. Environmental Protection Agency has reviewed the Draft Final Parcel A Site Inspection (SI) Report for the **Hunters Point Annex** Superfund site. This report adequately addresses most of the concerns we raised on the Draft SI Report. However, several issues remain to be addressed before the report is put in final form. These are as follows:

1. In response to EPA comment #2 on the possibility of groundwater contamination in the UST S-812 area, based on VOCs detected in soil and groundwater at the time of the tank pull in August, 1991, the Navy states that additional investigation will take place. The results of that investigation are presented in Addendum #4 to the SI Report, dated October 29, 1993, which indicates that no VOCs were detected in the September, 1993 sampling in the vicinity of UST-812. A discussion should be provided as to what is different about the two sampling efforts that TCE was detected in the first round and not the second. The detection of TCE in groundwater at this site in the initial investigation, although at low levels, is still of concern, since the two sampling rounds are not consistent with each other. Possible sources of TCE in this area and the possibility of a previously unidentified plume should be further discussed.

2. EPA comment #4 addressing the possible contamination of the Parcel A bedrock aquifer has not been adequately addressed. The possibility of contamination from the gardener's shed moving into this aquifer should be addressed by sampling groundwater in the vicinity of the one boring where the Navy previously detected groundwater (PA50B011) and doing a full chemical analysis of that water.

3. EPA comment #10 refers to the need for an ecological risk assessment for Parcel A prior to property transfer. In the Draft Final SI Report, the Navy indicates that the ecological assessment for Parcel A will be done as part of the site wide ecological assessment, with Phase IA results available in March 1994. However, based on discussions with Navy personnel, we understand that you are instead planning to complete the assessment for Parcel A as part of the Final SI Report, with assistance from EPA toxicologist Roxy Barnett. We support this later approach, as opposed to waiting for the site wide ecological assessment. This change should be reflected in the Draft Final SI Report.

4. In response to the derivation of the lead clean-up value, Bechtel specific comment #4, the document should be changed to delete the previous derivation of a lead number and replace it with a discussion of the California Leadsread model and the modeling output. Using this model will apply up to date scientific evaluation of the conditions at Hunter's Point to derive a soil hazard level consistent with EPA and state guidance for lead.

5. In response to EPA comment #5, regarding surface water discharges from Parcel A into the Bay, the Navy states that at the "point of entry into the Bay...potentially associated effects are insignificant." Since no sampling of storm drain sediments in Parcel A was done, this statement is not substantiated by data. EPA believes that storm drain sampling would still be the most prudent means to address this issue. The Navy has indicated that it would rather remove sediments in the storm drain system in Parcel A. Based on the results of sampling, such removal may or may not be necessary. If the Navy, nevertheless intends to proceed with this action, what is the timeframe and review process for regulatory involvement? To meet the requirements of CERCLA Section 120(h)(3), this removal action or sampling which demonstrates no risks needs to be completed prior to transfer of Parcel A.

6. The Navy has still not clarified what it intends to use as a transfer decision document for Parcel A. This issue needs resolution and concurrence by the regulatory agencies, in order not to impede the transfer schedule.

We appreciate the opportunity to provide input on this Draft Final SI Report as part of the Base Closure Team, to promote expeditious reuse of Parcel A in a manner that is protective of human health and the environment. Because this report is a draft

final primary document, under the terms of the Federal Facilities Agreement, the above issues should be addressed prior to the Final SI Report through the dispute resolution process. Through this letter we are informing you of our intention to engage in dispute resolution, which should begin with informal negotiations at the project manager level immediately. I can be reached at (415) 744-2420 to discuss these matters.

Sincerely,



JULIE R. ANDERSON, CHIEF
Federal and Technical Programs Branch

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