



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

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T4A1WR
for Action

January 3, 1994

Mr. Mike McClelland
Remedial Project Manager
Mail Code: T4A1MM
Western Division
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402

Dear Mr. McClelland: *Mike*

We have reviewed the materials which were handed out at the November 2, 1993 meeting on the Site Inspection Data Presentation on Parcel D at Hunters Point Annex (Volume II and III). This also includes the materials handed out pertaining to the underground storage tanks located in Parcel D. We are providing the attached comments to supplement our verbal comments and input provided to you at the meeting.

We appreciate your full consideration of these comments in your preparation of the final Site Inspection report and final Remedial Investigation work plan for Parcel D. Should you have questions, you may contact me at (415) 744-2394.

Sincerely,

RAYMOND SEID
Remedial Project Manager
Federal Facilities Cleanup Program

attachment

cc: Cyrus Shabahari, DTSC
Barbara Smith, RWQCB
Amy Brownell, SFDPH
Ray Ramos, BEC, NAVFAC WESTDIV

**COMMENTS ON PARCEL D SITE INSPECTION DATA PRESENTATION
ON NOVEMBER 2, 1993 (VOLUME II AND III)**

NOTE: The comments on the PA Site Inspection Flow Chart provided to the Navy on December 29, 1993 regarding the Site Inspection Data Presentation for Parcels B and C (Volume I) also apply here.

1. Confirm that the regunning pier in PA-32 is included in the facility-wide radiological investigation.
2. Provide the rationale for concluding that chloroform detected in the ground water for PA32MW04A (PA-32) is not the result of a point source release. Given the past findings of EMCON for that well and the fact that chloroform was not detected in any soil borings or in the only other well nearby (PA50MW07A), we cannot understand how it was concluded that chloroform was not from a point source.
3. Include in the work plan items for the hydraulic lifts found in Building 302 a records search, including interviews with past employees, on the types of hydraulic fluids used in the lifts. PCBs were commonly found in hydraulic fluids.
4. Relatively high concentrations of Lead were found in the North Portion of PA-33. Double check the HBL number used for Lead and make any necessary corrections; we believe the HBL for Lead is 500 ppm.
5. In the South Portion of PA-33, floor vault samples should have included sampling of sediments which may have been in the piping runs associated with the floor vaults.
6. In the South Portion of PA-33, it is confusing to designate Boring #PA33B035 as both the soil boring behind Building 364 and the soil boring beneath the stained asphalt near a drum on the east side of Building 411.
7. In the South Portion of PA-33, TCE is detected in the shallow soil. Although the data is below HBLs, this is but a single sampling point. Additional investigation (e.g., soil vapor gas survey) is warranted to pinpoint the hot spots of TCE in that area before utilizing the air flux chambers. Also, specify what criteria will be used to determine the number and locations of the chambers.
8. For PA-34, Table 1 indicated drums of various chemicals were stored in and around Building 366 and that releases from the drums were evident. Was a response action taken at this site or do the leaking drums still exist? What specific activities is Christian Engineering currently doing at this drum location?

9. We understand that Building 274 in PA-35 involved radiation-simulation in decontamination training. Confirm that this building is included in the facility-wide radiological investigation. Also, PA35SS06 shows levels of Aroclor 1260 exceeding HBLs at Building 306, however no followup actions are shown on the work plan. Specify followup actions. In the work plan items for Building 274, evaluate whether the floor drains also empty into the raised sump as well to the vault and storm drains.
10. In the West Portion of PA-36, revise the work plan to include Hydropunch borings and water sampling for the points B040 through B042, and B043 through B045. Also, in addition to investigating the extent of TPH in the soil and ground water at Boring #PA36B022 and Monitoring Well #PA36MW08A, investigate the extent of Aroclor 1260 and Mercury releases as well.
11. In the North Portion of PA-36, reconsider locating Borings B034 through B036 with respect to up and down gradient of Monitoring Well #PA36MW03A. Also, where Arsenic is detected above HBLs at PA36MW01A and PA36B009, and where Methylene Chloride is detected above HBLs at PA36B003, sound rationales (i.e., protective of human health and the environment) are needed to dismiss further investigations of these areas other than the determination that they were not point source releases.
12. In the South Portion of PA-36, specify in more detail how ground water data will be re-evaluated in the second round of Parcel D ground water sampling in light of the Heptachlor contaminant finding. Also specify the criteria used for determining the number and locations of the air flux chambers at PA36B012.
13. Table 1 indicated the possibility of a sump being present at Building 435 in PA-37. Account for whether this sump existed or not. If so, did the site inspection work account for potential contaminants in and around the sump? Also, provide the supporting rationale for the determination made that the TOG exceeding HBLs (6700 ppm) found at PA37SS04 is not a point source release.
14. Table 1 indicated the presence of a transformer at Building 500 in PA-38. Account for any potential releases from this transformer.

15. In PA-39, levels of Aroclor 1260 contaminant were detected at levels exceeding HBLs at PA39B004 and PA39B005. Provide additional supporting rationale (i.e., protective of human health and the environment) for not recommending additional investigation other than the determination made that the contamination was not from a point source.
16. In PA-53, Antimony contamination at levels exceeding HBLs is prevalent throughout a large portion of the site. Explain why no followup action is recommended in this regard. We also understand that the investigation of the PA-16 area adjacent to PA-53 will be redone for the full chemical sweep because previous data were deemed to be unreliable.
17. In PA-55, take a more shallow soil sample near PA55TA10 to better characterize the vertical extent of PAH contamination in the soil (4.39 ppm at 3.5 ft. indicated relatively high PAH contaminant levels). Also, for the HBL exceedence for Arsenic at PA55TA10, Benzo(a)pyrene at PA55TA07, and Lead at PA55TA05, provide additional supporting rationale (i.e., protective of human health and the environment) for the recommendation for no additional investigation other than the determination made that releases were not from point sources.
18. For Tanks S-304 and S-305, it was discussed that although the proposed work plan shows 3 borings, 7 Hydropunch, and 3 ground water monitoring wells, there may be as many as 12 Hydropunch and 6 monitoring wells installed for the more severe Case III contamination scenario. The work plan should be revised to reflect this.
19. For Tanks S-435(1) and S-435(2), it was discussed that there may be as many as 3 ground water monitoring wells installed for the Case I contamination scenario. The work plan should be revised to reflect this.
20. It appears that the contamination scenario for Tank S-508 warrants a Case III investigation status rather than a Case II because of the up to 3900 ppm TPH diesel detected in the soil. Some limited excavation of contaminated soils may also be warranted.
21. For Tanks #S-711 through S-714, some limited excavation of contaminated soils may also be warranted primarily due to the up to 17,000 ppm TPH gasoline and the up to 7500 ppm TPH diesel found in the soil.