



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

Rec'd 1/12/94
mem

Dave S

January 4, 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:

We have received the materials (dated November 3, 1993) which were handed out at the November 2, 1993 meeting on the Site Inspection Data Presentation on Parcel E at Hunters Point Annex (Volume II and III). This also includes the materials handed out pertaining to the underground storage tanks located in Parcel E. 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 E. Should you have questions, you may contact me at (415) 744-2394.

Sincerely,

A handwritten signature in cursive script that reads "Raymond Seid".

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

ATTACHMENT

COMMENTS ON PARCEL E 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. For Building 527 in PA-40, it is not sufficient to make the determination not to core the concrete simply because the foundation appeared to be intact because concrete is generally porous. Since it was determined that a sample cannot be taken of the one-square foot stain observed on the concrete, then at a minimum, the stained portion of the concrete should be removed given that transformers which may contain PCBs are the likely sources of the staining.
2. For the Building 524 transformer storage yard in PA-51, specify why background information identified former locations of transformers but yet the SI effort cannot even identify these locations to do SI work.
3. For PA-52, data indicates that the surface area is contaminated with varying levels of petroleum and metals (i.e., Lead and Copper). Further characterization of the extent of the contamination (both lateral and vertical) and surface soil removal action should be entertained well before any capping of the area is considered. Field methods should also be considered for defining the extent of the contamination, especially laterally.
4. For PA-54, we do not agree that the PA54SS01 surface soil data indicating HBL exceedence on Benzo(a)pyrene can be dismissed simply because it was determined that the contamination did not come from a point source. We do not understand how can this determination be made based on two composite samples each consisting of two surface sampling points. Additional investigation is needed to characterize the extent of the contamination.
5. For PA-56, we do not agree that the PA56B001 shallow soil sample data indicating HBL exceedence on PAHs and the PA56B004 shallow soil sample data indicating HBL exceedence on Arsenic can be simply dismissed because they were determined not to come from point sources. We do not understand how this determination can be made because point source releases of PAHs and Arsenic are not likely to infiltrate very deeply into soils anyway. Additional investigations are need to characterize the extent of PAH

and Arsenic contamination at PA-56. For areas determined to be contaminated with PAH and Arsenic in excess of HBLs, removal or even capping should be considered. As for the TCE contamination found in the PA-56 deep soil (PA56B002), ensure that these findings together with data forthcoming from the borings/Hydropunch proposed in the work plan are effectively integrated with any ground water data which exists for the area.

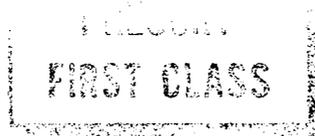
6. Be sure to integrate into the Parcel E work plan and draft Parcel E SI Report the new data, and interpretation thereof, forthcoming from the pending samples in PA-38 and PA-54.
7. For underground tanks #S-801 and #S-802, specify in the work plan that release(s) from these tanks are severe enough to warrant Case III type of an investigation which entails installation of up to 6 ground water monitoring wells and up to 12 Hydropunch borings. The full extent of the contaminated soil should be delineated and remedied in conjunction with efforts to remove these tanks.

RAY SEID (H-9-2)

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