

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
1700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

N00217.002960
HUNTERS POINT
SSIC NO. 5090.3



(510) 540-2122

April 5, 1994

Mr. Mike McClelland
Mail Code T4A1MM
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Building 101
San Bruno, California 94066-0720

Dear Mr. McClelland:

**HUNTERS POINT ANNEX GROUP 5 ALTERNATIVE SELECTION REPORT (ASR)
RESPONSES TO AGENCIES COMMENTS**

The California Environmental Protection Agency (Cal/EPA) has reviewed responses to the agencies comments on the Draft group 5 ASR. The responses were submitted to the Cal/EPA on 2/28/94. The enclosed remaining pending issues are forwarded for your consideration.

Should you have any questions regarding this letter and would like to seek clarification, please call me at (510) 540-3821.

Sincerely,

A handwritten signature in cursive script that reads "Cyrus Shabahari".

Cyrus Shabahari
Project Manager
Base Closure Branch

Enclosures

cc: See next page



Mr. Mike McClelland

April 5, 1994

Page 2

cc: US EPA
Region IX
Attn: Ms. Alydda Manglesdorf
Mail Code H-9-2
75 Hawthorne Street
San Francisco, California 94105

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

City and County of San Francisco
Department of Public Health
Attn: Ms. Amy Brownell
101 Grove Street, Room 207
San Francisco, California 94102

DTSC/OSA
Attn: Mr. Jim Carlisle
400 P Street, 4th Floor
P.O. Box 806
Sacramento, California 95812-0806

Mr. Mike McClelland

April 5, 1994

Page 3

1. Page 16, comment 7, the response did not address the reason why TOG level of 170,000 ppm at IR-3 should not be considered for an interim action. It seems that 17% of the soil contains TOG that requires final remediation. It should be noted that there is no facility wide TOG removal program. The criteria on page ii do not limit the scope of the ASR to everything but the TOG, Lead and Mercury. It is not clear why these limitations are considered. Please visit the criteria on page ii.
2. Page 22, response 27, this response seems to demonstrate a practice of investigation that is being implemented. It is not clear what happens if contamination is found. It goes without saying that if contamination is found once the groundwater is said to be contaminated. Further investigation is to determine the extent of the contamination. The response indicates an additional criterion upon which the plume definition and subsequent interim action is based on.
3. Page 23, Response 28, detailed ARARs were submitted to the Navy in 1991. Further, this has been the first iteration for an interim remedial action. So there has not been an opportunity of ARAR evaluation. The purpose of the comment was to inform the Navy that there are other state agencies whose requirement must be considered. The Cal/EPA is determined to provide timely ARARs to accelerate the cleanup at Hunters Point.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

2101 WEBSTER STREET, SUITE 500

OAKLAND, CA 94612

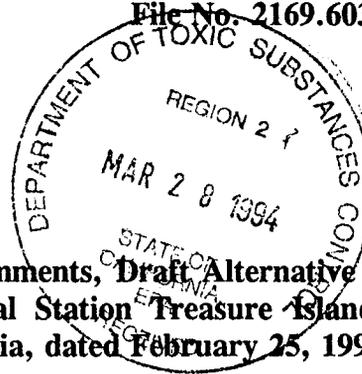
(510) 286-1255

March 8, 1994

File No. 2169.6032(BMS)



Mr. Cyrus Shabahari
Department of Toxic Substances Control
700 Heinz Avenue, Building F, Suite 200
Berkeley, CA 94710



Subject: Navy Responses to Agency Comments, Draft Alternative Selection Report, Interim-Action Group 5, Naval Station Treasure Island, Hunters Point Annex, San Francisco, California, dated February 25, 1994.

Dear Mr. Shabahari:

The staff of the San Francisco Bay Regional Water Quality Control Board (SFRWQCB) have completed their review of the above document received in our office on February 15, 1994. Presented below are additional comments that should be addressed.

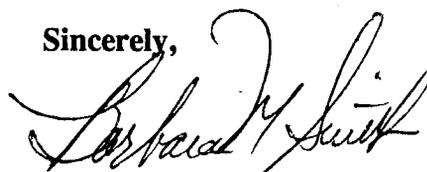
The Navy provided an example of a Total Petroleum Hydrocarbon (TPH) cleanup level, approved by SFRWQCB staff on April 15, 1992, for Site K in San Francisco, California. As understood by staff, this was a site-specific cleanup level based on several important criteria: 1. the site was a small, triangular piece of land, approximately 200 square feet in surface area; 2. the source of contamination was long-chain hydrocarbons with little or no volatile components; 3. a study of surrounding high-rise buildings showed that their structural stability would be threatened if extensive excavation of the site took place; 4. groundwater monitoring demonstrated that groundwater had not been affected; 5. material left in place was encapsulated with concrete four feet in thickness so that neither human health nor water quality would be affected; 6. deed restrictions were placed on the property; 7. the property was to be used for low income housing and the project could not have gone forward due to the costs of removing all of the contaminated soil.

This series of criteria, combined, have little or no resemblance to the situation at Hunters Point Annex (HPA): 1. the site is very large; 2. the sources of TPH contamination include diesel and gasoline that have relatively short chain hydrocarbons and some volatile components; 3. structural stability of surrounding buildings is not a key criterion because few of the buildings are more than one story and, where tanks are being closed in place, this concern is already being addressed; 4. monitoring has demonstrated that groundwater quality affected; 5. emplacement of a four foot thick concrete cap across the site is probably too costly; 6. deed restrictions on such a large site would severely limit its reuse; 7. the economic constraints of the Site K project are not a relevant criterion at HPA.

As has been previously stated, site-specific cleanup criteria may be derived from empiric testing of site soils to develop a TPH criterion that is protective of human health, the environment, and water quality. The SFRWQCB staff would be happy to assist in development of such a site-specific criterion.

Please direct your questions to me at (510) 286-4222.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara M. Smith". The signature is written in a cursive style with a large, looping initial "B".

Barbara M. Smith, Ph.D.
Remedial Project Manager

Memorandum

To : Cyrus Shabahari
Region 2, Site Mitigation
700 Heinz Ave., Bldg. F
Second Floor
Berkeley, CA 94710

Date: March 25, 1994

From : Office of Scientific Affairs (OSA)
400 P Street, 4th Floor
P. O. Box 806
Sacramento, CA 95812-0806
Phone: (916) 255-2049 Fax: (916) 255-2093

Subject : Hunter's Point Annex PCA Code: 14650 Site Code: 200050-43

Document Reviewed

Response to comments on Draft Alternative Selection Report, Interim Action Group 5, Naval Station Treasure Island, Hunters Point Annex San Francisco, CA

Comment 2: Our comment remains.

Comment 3: Explanation accepted; we still think seven significant figures is ridiculous.

Comment 4: Response accepted. We trust that the error will be corrected in the document as well.

Comment 5: Response acceptable pending review of final document.

Comment 6: Though we continue to question this approach, it appears to be the Navy's call. We will use 10^{-6} as the point of departure on the final FS decision.

Comment 7: Response accepted.

Comments 8, 9, 10, 11, 13 and 16: Responses accepted. These comments were suggestions rather than demands. The Navy appears to be committed to its original approach.

Comment 12: Although there is no RfD or cancer potency for lead, there are ways to assess health effects of lead. DTSC and USEPA both have mathematical models to estimate a distribution of blood lead levels resulting from environmental levels. Both agencies use 10 ug/dl as a maximum acceptable level. If residential use and the potential for home gardening cannot be ruled out, we prefer the use of the DTSC

model, which considers plant uptake. The maximum level of lead detected in IR-15 groundwater was 127 ug/l. If this were used as drinking water we would predict a median blood lead concentration in children of 21 ug/dl from that source alone. This is also well above WQCB objectives for protection of aquatic life.

Comment 14: Response accepted.

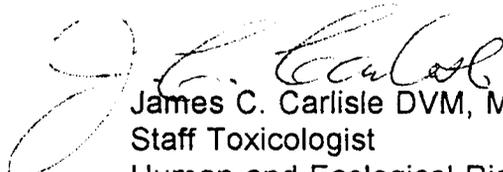
Comment 15: The response is not clear to us. As long as cancer risk is calculated as an aggregate of 6 years as a child with a body weight of 15 kg and other appropriate parameters and the balance of a 30-year exposure as an adult with a body weight of 70 kg, as the response to EPA comment 20 indicates it will be, then there should be no problem.

Comment 17: Our comment remains.

Comment 18: Response accepted.

CONCLUSION

None of the deviations from DTSC-approved practice appear to result in an imminent threat to human health. Therefore, even though some aspects of this health assessment would be disallowed in a baseline risk assessment or a feasibility study, this risk assessment for interim removal actions is acceptable with the corrections indicated in the responses. It is not clear when or in what form the corrections will be made.


James C. Carlisle DVM, MSC
Staff Toxicologist
Human and Ecological Risk

cc: Stephen DiZio, Ph.D.
Staff Toxicologist
Human and Ecological Risk
Section