

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2

100 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737

April 15, 1994



Mr. Mike McClelland  
Mail Code TM4AMM  
Western Division  
Naval Facilities Engineering Command  
900 Commodore Way, Building 101  
San Bruno, California 94066-0720

Dear Mr McClelland:

**HUNTERS POINT ANNEX PARCEL D SITE INVESTIGATION REPORT**

The California Environmental Protection Agency (Cal/EPA) is forwarding enclosed comments on the Parcel D SI report 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 black ink that reads "Cyrus Shabahari".

Cyrus Shabahari  
Project Manager  
Office of Military Facilities

Enclosures

cc: See next page



Mr. Mike McClelland  
April 15, 1994  
Page Two

cc: US EPA  
Region IX  
Attn: Allyda Mangelsdorf, Mail Code H-9-2  
75 Hawthorne Street  
San Francisco, California 94105

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

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

Harding Lawson Ass.  
Attn: David Leland  
P.O. Box 6106  
Novato, California 94948

PRC Environmental Management, Inc.  
Attn: Jim Sickles  
135 Main Street, Suite 1800  
San Francisco, California 94105

## GENERAL COMMENTS

1. Comments on Parcel D Public Summary were verbally conveyed to HLA on 3/4/94.
2. The Cal/EPA believes that there should be groundrules in conducting investigation by excavation. These groundrules need not be elaborate, but inclusive and to the point. For example, there should be an established criteria when, how and to what degree risk assessment results would necessitate an excavation. Landuse scenarios are to be also identified before undertaking any removals.
3. Any preliminary assessment sites recommended for further actions must roll into the IR program.
4. The Navy needs to explain how and when the recommended removal actions are going to be implemented.
5. Ph values should be measured for all samples.
6. Please correlate any above ground activity with what is found in the soil, groundwater and storm drain system. Surface sources need to be identified and removed before removing contaminants from the storm drain system.
7. This report does not include any information on the radiological issues. Please include any radiation sites in the report.
8. Gas was found in the Oil lines at PA-45. Please explain why.
9. An executive summary is missing from this report. Is the Public Summary in lieu of Executive Summary?
10. Have you investigated for any USTs beneath any buildings at Parcel D? It is suspected that operations at these commercial and industrial buildings might have drawn or stored hazardous substance in tanks beneath the buildings.
11. Any information related to the ecological concerns needs to be addressed. The ecological condition has not been part of the Parcel D SI report. Please explain how and when the ecological threats will be addressed. The Parcel D SI activities have only evaluated threats to human health.

## SPECIFIC COMMENTS

12. Page 5, paragraph 3, please further explain the investigation of the PCB. What was the reason behind not investigating further? Was the concrete pad constructed over the contaminated area? Was the exposure pathway blocked? Was the groundwater investigated? Please provide a reference to any previous investigation of the PCB spill. Further, please include the buildings that were affected by the spill that are no longer there.
13. Paragraph 5, the Cal/EPA has not agreed to use the IALs as background levels. Please delete the parenthesis.
14. Paragraph 7, please explain the significance of the "past 10 years". It is not clear why investigation has not looked at entire history of the operation. Please explain.
15. Page 6, section 2.4.1, please show the outfall locations on maps. This information is missing from all maps.
  - a. Section 2.4.2, please explain if the SI activities cover the B aquifer. Please explain why the scope of the SI has not covered deeper aquifers. Section 2.4.3, indicates limited data on the B and Bedrock aquifers, but does not explore the possibility of contamination. Please explain.
16. Page 9, section 3.3, please do not interchange the "background" with the "IALs". This is misleading and it will lead to confusion. The Cal/EPA has not approved the IALs to be background levels. Please delete.
17. Page 11, the information in the paragraph does not indicate any particular aquifer at Parcel D. The Bedrock aquifer seems to be clean hence potential drinking water source. The Cal/EPA does not agree with the assumption.
18. Page 12, section 5.1.1, the PA-45 scope of work did not include groundwater investigation. Please explain.
19. Page 20, the PCB seems to be ubiquitous in the drain system. Please explain why.
20. Page 24, Section 5.3.2.5, it is believed that fluid exchange with the environment has occurred. The integrity of the system has been compromised in many locations. Please explain if any sediments were observed in the system. Please explain why it was decided to stop at A aquifer. Is there a hydraulic connection with the lower aquifer?

### SPECIFIC COMMENTS

21. Page 25, Section 5.4.1, please see our comments on previous Parcels B and C reports in regards to PCB transformer locations.
22. Page 29, section 6.2.4, please include the other half of the regunning pear in the SI activity. The initial limitations do not exist anymore.
  - a. Section 6.3.1.1, please provide more information on the dip tank (e.g., size, location, and current status).
23. Page 31, section 6.3.2, it is important that the current tenant be notified of the radiological readings at that building. Any potential exposure to the current tenant must be identified and mitigated soon.
24. Page 33, section 6.3.2.3, there were 11 sumps and 10 floor vaults that were discovered after the SI activities were completed. Please explain how the discovery was made. Have you followed the same steps in identifying sumps, and floor vaults in other buildings at this and other parcels? Was the drain system to the building investigated for radioactivity?
25. Page 41, section 6.6.3.3, first paragraph indicates no further investigation of organic compounds while paragraph 4 indicates further investigation to evaluate the extent of "chemicals in soil and groundwater". Please clarify.
26. Page 42, section 6.7.4, please explain why additional investigating is not recommended to evaluate the extent of the PCB.