

**NAVY RESPONSES TO SUPPLEMENTAL AGENCY COMMENTS
DRAFT ALTERNATIVE SELECTION REPORT
INTERIM-ACTION GROUP 5 SITES
NAVAL STATION TREASURE ISLAND
HUNTERS POINT ANNEX
SAN FRANCISCO, CALIFORNIA**

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To: Distribution

From: Carl Michelsen, HLA ^{CM}

Date: May 5, 1994

Subject: Navy Responses to Supplemental Agency Comments
Draft Alternative Selection Report Interim-Action Group 5 Sites
Naval Station Treasure Island, Hunters Point Annex, San Francisco, California

Project No.: 11400 1810

On behalf of the U.S. Navy, Western Division Naval Facilities Engineering Command, please find the enclosed subject document in accordance with the Naval Station Treasure Island, Hunters Point Annex Federal Facilities Agreement. Please review the enclosure and provide written comments to Commander, Western Division, Naval Facilities Engineering Command, (Attn: Mr. Michael McClelland), Code T4A1MM), 900 Commodore Drive, Bldg. B101, San Bruno, California 94066-2402, with a copy to Mr. Dave Song, T4A1DS by June 5, 1994.

If you have any questions regarding this matter, please contact Mr. Dave Song, Code T4A1DS at (415) 244-2561.

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The following are the Navy's responses to the supplemental comments made by the California EPA Department of Toxic Substances Control (DTSC) dated April 5, 1994, the Office of Scientific Affairs (OSA)-DTSC dated March 25, 1994, and the California Regional Water Quality Control Board (RWQCB) dated March 8, 1994, on the *Draft Alternative Selection Report, Interim-Action Group 5, Naval Station Treasure Island, Hunters Point Annex, San Francisco, California* dated August 26, 1993 and Navy response to agency comments, on the draft report, dated February 25, 1994. Comments are reproduced here exactly as in the original documents.

I. DTSC COMMENTS AND NAVY RESPONSES

Comment 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.

Response: Federal and state toxicity values for TOG are not available. Therefore, it is not possible to determine if the TOG contaminant level poses an imminent or potential threat to human health to warrant interim action, as specified on page ii, or whether final remediation will be required. Lead and mercury are present throughout HPA and are associated with nonpoint sources. As specified on page ii, "chemicals associated with nonpoint sources are not evaluated in the ASR; because these chemicals are present throughout HPA, it is impractical to develop interim actions for them at individual sites. These chemicals will be addressed in the parcel RI/FS studies."

Comment 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.

Response: Groundwater is considered to be contaminated at a particular monitoring well location if compounds are detected during at least two monitoring periods. This is a criterion upon which further monitoring, plume characterization, and/or interim action are based. If compounds are not detected in at least two monitoring periods, they are not considered to be consistently present.

Comment 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 cleanup at Hunters Point.

Response: ARARs have been presented in each of the Interim Action Alternative Selection Reports (ASRs) as they pertained to remedial alternatives considered. As with all documents submitted for agency review, the Navy welcomes comments on specific sections so that an agreement can be reached on the level of detail necessary and the applicability of the information provided. If Cal/EPA has specific requirements that should be added to the list of ARARs, as stated in the comment, the Navy would appreciate receipt of these ARARs.

II. OSA (DTSC) COMMENTS AND NAVY RESPONSES

Comment: (Specific) Comment 2: Our comment remains.

Response: The Navy's approach is consistent with the EPA's Risk Assessment Guidance Document *Human Health Evaluation Manual (Part A)*, 1989.

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

Response: Comment acknowledged.

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

Response: ASRs are secondary documents and, as such, will not be resubmitted, as defined by the Federal Facilities Agreement. The corrections noted in the Navy Response to Comment 4 will stand as a record of the error. Corrections will also be incorporated in the appropriate primary document, in this case, the Parcel E RI.

Comment: (Specific) Comment 5: Response acceptable pending review of final document.

Response: ASRs are secondary documents and, as such, will not be resubmitted.

Comment: (Specific) 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.

Response: Comment acknowledged.

Comment: (Specific) Comment 7: Response accepted.

Comment: (Specific) 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: (Specific) 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.

Response: Using the 95% upper confidence limit (UCL) on the arithmetic mean as the exposure point concentration (EPC) to evaluate contaminants of potential concern (COPC), the lead concentration at IR-15 is 50 µg/L. This would predict a median blood lead concentration in children of 11.7 µg/dL from groundwater alone and is understood to exceed the 10 µg/dL DTSC and US EPA maximum acceptable level. Due to the high concentrations of diesel, extractable unknown hydrocarbons, and TOG in groundwater, interim remedial action (IRA) at Site 15 groundwater was recommended.

Comment: (Specific) Comment 14: Response accepted.

Comment: (Specific) 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.

Response: The Navy believes the response to Specific Comment 15 submitted on February 25 addressed the DTSC's concerns.

Comment: (Specific) Comment 17: Our comment remains.

Response: Please indicate the parameter values that DTSC would find appropriate for developing HBLs for arsenic.

Comment: (Specific) Comment 18: Response accepted.

III. NAVY RESPONSE TO RWQCB LETTER

Response: In response to the RWQCB suggestion to develop HPA-specific TPH cleanup levels from empirical data, the Navy would like to meet with the Board as soon as possible to discuss the approach to be taken.