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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

MAY 18 1994

William McAvoy (09AR1WM)
Western Division
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402

Subject: Parcel B Draft Final Site Inspection Report

Dear Mr. McAvoy:

We are in receipt of the Draft Final Parcel B Site Inspection (SI) Report submitted April 18, 1994. Thank you for the opportunity to review and comment on it. This letter and all four of the attachments constitute our review. In particular, Appendix A includes our review of the Navy's responses to comments on the draft report.

As per the Federal Facility Agreement, the agencies have 30 days after the submittal of a draft final report to approve a document before it becomes a final document. As such, the U.S. Environmental Protection Agency (U.S. EPA) partially approves the Draft Final Parcel B SI Report as a final document. In particular, those portions of the report which describe the SI data collection methods and findings are approved. Further, the Remedial Investigation (RI) work plan tasks proposed for PA-45, PA-50 (Sanitary Sewers), PA-23, PA-24, PA-25, PA-26, PA-31, and PA-42 are approved as a Phase I RI effort. Additional phases of RI work, however, may be necessary at those sites and others, depending on the findings of this first phase. Specific comments regarding these sites which must be addressed are given in Appendix B.

As you know, we met on May 13, 1994 to discuss several outstanding issues related to the Parcel B SI report as well as the SI reports for Parcels C, D, and E. A memorandum was submitted to you outlining these issues and is dated May 10, 1994 (Appendix C). In our meeting we endeavored to determine a course for the resolution of the issues outlined in the memorandum. We made great strides in resolving many of the outstanding issues and committed to a series of technical meetings to resolve those that remain. Appendix D contains a summary of our discussion of May 13, 1994 and provides the basis for our partial approval of the SI report.

Implicit, in our partial approval, however, is also a partial disapproval. U.S. EPA does not approve as final that portion of the report which relates to the Navy's recommendations

for PA-46, PA-50 (Storm Drain System), PA-51, and PA-57. Appendix B describes in more detail our rationale regarding each of these PA sites and issues which must still be resolved. Further, U.S. EPA does not approve as final, the overall scope of work for the RI stage of data collection. As determined in our meeting on May 13, 1994, a conceptual model of each of the parcels with an analysis of data quality objectives and data gaps is necessary before U.S. EPA can approve an overall RI scope.

As an immediate need, currently proposed RI work should be re-evaluated in the context of the Navy's hydrogeologic site conceptual model now under internal review. In particular, the Navy must re-evaluate the location of proposed ground water monitoring wells to determine if proper consideration has been given to the impact of tidal influence on the groundwater flow direction. This, of course, is particularly important for those wells which are proposed specifically as "down gradient" wells which may due to tidal influence be both down and up-gradient.

As a final highlight, the proposed exploratory excavations for PA-23, PA-26, and PA-42 must be scoped, planned and executed with agency participation. It is unclear from the SI report what administrative process the Navy is proposing for this work. In addition, it does not appear that appropriate preliminary remediation goals have yet been identified for the excavations. Both of these matters must be more fully explored with the agencies.

It is our hope that our partial approval of the Parcel B SI Report will allow the Navy to continue its planned field work at those sites for which the work plan has been approved while ensuring that the Navy continue to meet with the agencies to resolve the other outstanding issues. If you have any questions, please contact me at (415) 744-2409.

Sincerely,



Alydda Mangelsdorf
Remedial Project Manager

cc: B. Smith, RWQCB
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R. Raymos, WESTDIV
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Comments on the Navy's Draft Final Parcel B Site Inspection Report

1. **3/4/94 General Comments 1 - 8:** As the Navy indicates, the approved site inspection work plans were intended to support data collection necessary to determine whether PA sites require further investigation. The report of results presented in the Draft Final Parcel B Site Inspection Report (SI report) is consistent with this intention. However, after approval of the original work plans the Navy and EPA agreed that parcel remedial investigation work plans should also be presented in the SI reports. To fully document that the proposed remedial investigation work plan addresses all Parcel B data gaps, the information requested by general comments 1 to 8 should be provided in the SI report. Comments 1 to 8 were designed to encourage development of a preliminary Parcel conceptual model, based on all existing Parcel B data. This preliminary model can then be used to identify data gaps that must be addressed by the remedial investigation work plan.
2. **2/28/94 General Comments 1 - 3 and 3/4/94 Specific Comments 7 and 8:** All available information requested by these comments should be provided in the Navy's HPA Hydrogeologic Report. This report should provide preliminary hydrogeologic conceptual models for each parcel at Hunters Point and fully support the conclusion that groundwater beneath each parcel is of limited potential use as drinking water.
3. **3/4/94 Specific Comments 13 and 19:** The Navy states that bay sediment and storm water sampling were previously addressed in *Water Quality Investigation of Storm Water Drainage* (HLA 1991), in the Environmental Sampling and Analysis Plan, and will be investigated further as part of the Ecological Risk Assessment (ECA). The stated objectives in PA-50, Storm Drain and Sanitary Sewer Systems, include "To inspect the storm drain lines and evaluate if contaminants have been released to the soil, groundwater, or San Francisco Bay". However, no data concerning San Francisco Bay water and sediment were presented. Although the Navy indicates that bay sediment and storm water conditions will be investigated further during the ECA, available data concerning San Francisco Bay water and sediment contamination at Parcel B should be presented in the SI report and an evaluation of potential releases to San Francisco Bay performed.
4. **3/4/94 Specific Comment 27:** Additional information from the vicinity of the former transformer is required to support the Navy's conclusion that the PCB contamination is due to a non-point source release. According to Figure 5 the next step is to perform additional investigation activities at this location. If the Navy considers the risk of Aroclor-1242 in soil at this location to be low enough such that further study is not warranted, the Navy should provide health risk data specific to Aroclor-1242 to support this conclusion.

Appendix B
**Evaluation of the Navy's Parcel B
Preliminary Assessment (PA) Site Remedial Investigation Work Plans**

PA Site	Description	RI Work Plan Concurrency	Comments or Rationale
PA-45	Steam Lines	Concur	Removal of oil and friable asbestos from steam lines will be conducted outside the RI program. The exact number and locations of borings to evaluate steam line contamination at Drydock 4 will be submitted under the Field Variance Program.
PA-46	Fuel Distribution Lines	Do not concur	Further rationale must be provided for not considering areas contaminated with Aroclor 1260 (PA46TA10, PA46TA11, and PA24B004) for further investigation. This work plan must incorporate data from Tank Farm investigation. The number and location of monitoring wells will be submitted under the Field Variance Program.
PA-49	Storm Drains	Do not concur	Storm drain repair, sediment removal and sediment monitoring should be conducted as part of the RI program rather than as routine facility maintenance. Sediment samples must be collected at storm drain outfalls. The proposed test pit depth and sampling interval will be submitted under the Field Variance Program
PA-50	Sanitary Sewer	Concur	No comments
PA-51	Former Transformers Sites	Do not concur	Further rationale must be provided for not considering areas contaminated with Aroclor 1260/1242 (PA51SS01) for further investigation. Preliminary remediation goals must be specified for proposed exploratory excavations. The administrative records associated with exploratory excavations must be specified.
PA-23	Buildings 146, 161, and 162	Concur	Preliminary remediation goals must be specified for proposed exploratory excavations. The administrative records associated with exploratory excavations must be specified.
PA-24	Buildings 124, 125, 128, and 130	Concur	No comments
PA-25	Building 134	Concur	No comments
PA-26	Buildings 157 and Area XIV	Concur	Preliminary remediation goals must be specified for proposed exploratory excavations. The administrative records associated with exploratory excavations must be specified.
PA-31	Building 114	Concur	No comments

PA Site	Description	RI Work Plan Concurrence	Comments or Rationale
PA-42	Building 109 and 113	Concur	Preliminary remediation goals must be specified for proposed exploratory excavations. The administrative records associated with exploratory excavations must be specified.
PA-97	Drydock 4 Area	Do not concur	Due to arsenic contamination storm drain repair, sediment removal and sediment monitoring should be conducted as part of the RI program. Preliminary remediation goals must be specified for proposed exploratory excavations. The administrative records associated with exploratory excavations must be specified.



Appendix C

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

MAY 10 1994

MEMORANDUM

TO: Bill McAvoy
Naval Facilities Engineering Command

FROM: Alydda Mangelsdorf
U.S. Environmental Protection Agency *AM*

SUBJECT: May 13, 1994 Meeting

The following is a list of topics related to the U.S. Environmental Protection Agency's (EPA) review of the Parcel B Site Inspection (SI) Report which are still unresolved. It is my hope that we can informally resolve these issues in our meeting on May 13, 1994. While raised in the context of the Parcel B SI report, these issues apply to each of the Parcel SI Reports.

1. The RI Workplan must be based on a Conceptual Model of contamination at each parcel, derived from an evaluation of all data for each parcel, including both SI and RI data. Data Quality Objectives must be formed and an assessment of data gaps made to ensure that all necessary data will be collected in the RI stage, sufficient to select and design a remedy.
2. No SI sites can be dismissed from further investigation until the likelihood of their contributing to ecological risk is assessed. To achieve this, ecological criteria must be identified or developed to screen the SI data.
3. No SI sites can be dismissed from further investigation until their contribution to a cumulative risk is assessed.
4. No SI sites can be dismissed from further investigation based on Interim Ambient Levels (IAL) until Agency-approved IALs have been applied to those contaminants for which agency-approved IALs are lower than those IALs currently in place.
5. No SI sites can be dismissed from further investigation simply because investigators failed to identify a point source of environmental contaminants measured. Until risk management decisions are formally made, one can not presume that non-point source contamination, especially if in excess of ecological or human health criteria, will be left unremediated, thereby requiring no further characterization.

Appendix D
Summary of the May 13, 1994 Meeting

1. Conceptual Model/DQOs

The Navy agreed to a series of technical meetings for the purpose of developing a conceptual model for each parcel. Beginning with a meeting on Thursday, June 16, 1994, the project managers team will review all the data available for Parcel B and attempt to correlate it in such a way as to develop a conceptual model of site contamination and migration. We will endeavor to identify current data gaps to be filled in subsequent phases of RI work. The project managers team will include ecological and human health risk assessors, design engineers, hydrogeologists, and source investigators to ensure that appropriate DQOs are identified for each data user.

2. Ecological Criteria

The Phase 1A Ecological Risk Assessment data presentation is scheduled for Friday, June 10, 1994 and will include an evaluation of all SI data as compared to ecologically-based screening criteria, as recommended by U.S. EPA in the SI comments.

Still Outstanding: Currently there are no plans to evaluate whether detection limits have been low enough to detect contamination of potential ecological risk. Further, there is no plan to evaluate the appropriateness of the SI sampling design for the purpose of measuring potential ecological risk.

3. Cumulative Risk

The Navy will evaluate all SI sites--even those not recommended for RI work--for their potential to contribute to cumulative risk as part of its parcel-specific risk assessment.

4. Interim Ambient Levels

The Navy will be providing comment on California Environmental Protection Agency's proposed Interim Ambient Levels (IAL).

Still Outstanding: The Navy has not yet agreed to use agency-approved IALs. No specific process for resolution of this matter was proposed.

5. Source Identification

The Navy agreed to reconsider those sites at which contaminants were measured but no point source was

identified. It agreed to provide a written site-specific explanation for its recommendations at these sites rather than rely on a "non-point source" argument. Further, it agreed to consider further investigation at those sites if an explanation could not be given.