



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

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JUN 03 1994

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

Subject: Parcel C Draft Final Site Inspection Report

Dear Mr. McAvoy:

We are in receipt of the Draft Final Parcel C Site Inspection (SI) Report submitted May 2, 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 C 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-27, PA-28, and PA-58 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-49, PA-50, PA-51, PA-29 and PA-30. 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 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. We recommend a meeting to discuss these matters, as soon as possible.

It is our hope that our partial approval of the Parcel C 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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Comments on the Navy's Draft Final Parcel C Site Inspection Report

1. The Navy should develop and document quantitative criteria to distinguish between point source and non-point source contamination. In response to EPA's 8/31/93 general comment No. 1, the Navy indicates that non-point source contamination is confined to shallow subsurface soil, is infrequently encountered, and does not appear to be associated with a known or suspected usage areas or releases. These criteria inappropriately exclude from further consideration infrequent and immobile surface soil contamination. See EPA's 3/11/94 specific comments Nos. 14 and 21 and EPA's 8/31/93 specific comments Nos. 16 and 21.
2. In response to several EPA comments, the Navy indicates field variances will be submitted following anticipated field activities. Since the Navy is currently planning the field investigation, anticipated field activities should be included in the remedial investigation work plan. This will reduce the need for field variances and allow EPA to review planned work prior to its execution. See EPA's 8/31/93 general comments Nos. 5 and 9, EPA's 8/31/93 specific comment No. 20, and EPA's 3/11/93 specific comment No. 7.
3. In response to EPA's 8/31/93 general comment No. 8, the Navy disagrees with EPA's policy on filtering groundwater samples. The justification promised by the Navy's response should be provided as soon as possible. This is a risk assessment issue that must be resolved prior to implementation of the Navy's remedial investigation work plan.
4. In response to EPA's 3/11/94 general comment No. 4, the Navy proposes screening criteria for aquatic receptors. These criteria, and the decisions based on these criteria, must be integrated in the remedial investigation work planning process and reflected in the proposed remedial investigation work plan. Also see EPA's 3/11/94 specific comments Nos. 11 and 12, EPA's 8/31/93 general comments Nos. 4 and 10, and the California Department of Fish and Game 3/4/94 letter.
5. In response to EPA's 8/31/93 specific comment No. 7, the Navy indicates that, "at this time," no tidal influence monitoring is planned for wells installed in Parcel C as part of the remedial investigation. As part of remedial investigation work planning, the Navy should determine what numerical vadose zone and groundwater models are required to complete the remedial investigation report and support the feasibility study. Once the models are selected it will be clear what data should be gathered in the remedial investigation.
6. As suggested in EPA's 8/31/93 specific comment No. 10, the Navy should determine Cr⁶⁺ in several of the groundwater samples collected from

hydropunch borings B176 to B180, or other appropriate down gradient borings.

7. In response to EPA's 8/31/93 specific comment No. 12, the Navy indicates criteria are under development to determine if sandblast grit is suitable for recycling or disposal. The Navy should provide these criteria for review as soon as they are available.
8. EPA's 10/12/93 comments Nos. 1, 2, 3, and 4 on the Navy's PA Site Inspection Flow Chart reflect a continued lack of clarity on how the Navy decides whether or not to further investigate a site. This uncertainty is reflected in the Navy's decision to further investigation some former transformer sites while dropping others from consideration. Apparently this particular decision was apparently based on risk to human health. The EPA has not approved this methodology. The Navy must develop and document a decision making process that is consistently applied and understood.
9. Before dismissing the use of field screening methods in the remedial investigation, the Navy should consult with the remedial investigation data users; e.g., risk assessor, numerical modeler, and remedial design engineer; to determine what level of data quality is required by each user and how much data is needed. See Navy response to EPA's 10/12/93 comment No. 8.
10. As requested by EPA's 10/12/93 comment No. 10, the Navy should provide brief details to document the rationale for the number and location of monitoring wells and soil borings proposed in the remedial investigation work plans accompanying this and other site inspection reports.
11. The Navy should provide specific rationale for the exclusion of storm drain sediment removal and repair activities from the remedial investigation. Storm drains represent a significant pathway for exposure of aquatic receptors to site contaminants. As such, removal and repair activities should be addressed by RI/FS programs, specifically by the remedial investigation work plan. See EPA's 10/12/93 comments Nos. 14, 15, and 16 and EPA's 3/11/94 specific comment No. 15.
12. EPA's 10/12/93 comment No. 22 suggests criteria should be developed to determine the extent of excavation around contaminated fuel lines. The Navy and EPA should discuss and agree upon appropriate criteria for all exploratory excavations. Agreements reached now may limit the amount of additional remedial action required after completion of parcel feasibility studies.
13. As specified in the May 13, 1994 memorandum from Alydda Mangelsdorf (EPA) to Bill McAvoy (Navy), the RI work plans presented in this report must be based on a conceptual model of contamination derived from an evaluation

of all Parcel C data. See EPA's 10/12/93 comment No. 23, EPA's 3/11/94 general comments Nos. 1, 2, and 3 and EPA's 3/11/94 specific comment No. 6.

14. As specified in the May 13, 1994 memorandum from Alydda Mangelsdorf (EPA to Bill McAvoy (Navy)), sites cannot be dismissed from further investigation based on Interim Ambient Levels (IALs) until Agency approved IALs have been used to analyze Parcel C data. See also EPA's 3/11/94 specific comment No. 8.
15. The Navy should provide specific rationale for the exclusion of dry dock sediment and water sampling and analysis from the remedial investigation. The EPA and Navy should discuss and agree upon which clean up activities should be considered RI/FS activities and which should be considered housekeeping activities. See EPA's 3/11/94 specific comment No. 26.
16. The comments made by Matthew Hagemann in his 3/11/94 letter to Roberta Blank have not been adequately resolved by the Navy's response. The requested information must be included in the Navy's pending hydrogeology report.

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

PA Site	Description	RI Work Plan Concurrency	Comments or Rationale
PA-45	Steam Lines	Concur	Navy to remove friable asbestos and fluid in lines outside the RI program. Navy should develop for the RI report arguments to support the representativeness of steam line sampling points. Drydock 4 steam line investigation and removal is described in the Parcel B, PA-45, proposed work plan.
PA-49	Fuel Distribution Lines	Do not Concur	Further rationale must be provided for not considering areas contaminated with benzo(a) pyrene, PA49TA07, for further investigation. Preliminary remediation goals for excavations associated with fuel line removal actions must be specified. Fuel line and associated soil removal to be performed outside the RI program.
PA-50	Storm Drain and Sanitary Sewer System	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.
PA-51	Former Transformer Sites	Do not Concur	Further rationale must be provided for not considering areas contaminated with PCBs for further investigation. Preliminary remediation goals for proposed exploratory excavations must be specified. Exploratory excavations to be performed outside the RI program.
PA-27	Building 205	Concur	No comments
PA-28	Buildings 211/253, the Bomb Shelter, 219, 230, 258, 270, 271, and 281	Concur	Investigation of Building 281 to be documented under the field variance program. Criteria for inclusion of sandblast grit in the Navy's recycling program must be developed and agreed to by the Agency. Quality assurance and quality control requirements for soil gas flux chamber measurements must be addressed in the QAPjP. Preliminary remediation goals for proposed exploratory excavations must be specified. Exploratory excavations to be performed outside the RI program.
PA-29/PA-30	Buildings 203, 275, 282, 217, 241, and 279/280	Do not concur	Further rationale must be provided for not considering the areas contaminated with arsenic, PA29B017, and Aroclor, PA29SS27, for further investigation. The approach to further investigation of floor vaults in Buildings 217, 279, and 280 to be provided under the field variance program. If groundwater is encountered, samples must be collected and monitoring wells installed and sampled. Preliminary remediation goals for proposed exploratory excavations must be specified. Exploratory excavations to be performed outside the RI program.

PA Site	Description	RI Work Plan Concurrency	Comments or Rationale
PA-30	Forge Shop	Do not concur	Quality assurance and quality control requirements for soil gas flux chamber measurements must be addressed in the QAPjP. Preliminary remediation goals for proposed exploratory excavations must be specified. If groundwater is encountered, samples must be collected and monitoring wells installed and sampled. Exploratory excavations to be performed outside the RI program.
PA-58	Scrap Yard	Concur	Locations of proposed exploratory excavations to be determined in the field. Exploratory excavations to be performed outside the RI program. Preliminary remediation goals for proposed exploratory excavations must be specified.



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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.