



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

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July 7, 1993

Raymond E. Ramos
Code T4E1
Western Division
Naval Facilities Engineering Command
900 Commodore Dr.
San Bruno, CA 94066-2402

Dear Mr. Ramos:

The U.S. Environmental Protection Agency has reviewed the information presented to us at the June 10, 1993 meeting regarding Parcel A, Hunters Point Annex. We are providing you with preliminary comments regarding this data, for your use in preparing the Site Inspection (SI) Report for Parcel A. A complete review of the data cannot be performed until the SI Report is submitted. The enclosed comments are from our representative, Bechtel Environmental Inc. In addition, there are several points we would like to make, as follows:

1. We are still reviewing the Navy's proposed background levels, as you know, and should be done with this effort before the SI Report comes out. However, we would normally support the use of the 95% upper confidence limit background levels for a site such as Parcel A where it should be possible to establish the difference between contaminated versus reference samples.
2. As we discussed in our June 10th and July 6th meetings with you and the State agencies, there are several topics which the Navy has not addressed to date for Parcel A which need to be included in the Parcel A SI Report. The issue of possible ground water contamination both in the hillside and low lying areas of Parcel A needs to be addressed. For the low lying areas, this would include the possible cross-contamination of Parcel A by adjacent Parcels. In addition other possible exposure pathways across Parcel A need to be addressed, such as for airborne contaminants.
3. We would appreciate seeing the work plan for the additional excavation activities the Navy has planned for Parcel A. Information such as volumes of material to be disposed of, storage and disposal locations and methods, and other information needed to update the previous SI Work Plan Addendum should be addressed.

Please call me at (415) 744-2385 if you have any questions regarding these comments. We appreciate the opportunity to provide early input into the SI Report to help ensure this project can move

at an expeditious pace, and we are willing to look at other preliminary data or text that will be part of the SI Report or other transfer documents, as available.

Sincerely,

A handwritten signature in cursive script that reads "Roberta Blank".

Roberta Blank
Remedial Project Manager

cc: Jim Sullivan, NSTI
David Wells, SFPD
Bill Radzevich, WestDiv
Barbara Smith, RWQCB
Cyrus Shabahari, DTSC

Bechtel

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June 18, 1993

Ms. Roberta Blank H-7-5
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Subject: ARCSWEST Program Contract No. 68-W9-0060
Hunters Point Annex Work Assignment No. 60-05-9PP3
Review of the Navy's Parcel A data presentation, June 10, 1993

Dear Roberta,

As you requested, I attended Navy's Parcel A data presentation held June 10, 1993. I have also reviewed and consulted with Cathie Gardinier and David Liu regarding the Navy's soil contamination data and the Navy's recommendations for additional work in Parcel A.

Our review has included comparison of the Navy's measured soil concentrations to Region IX's preliminary remediation goals, the Navy's threshold background levels, and the 95% upper confidence limit background levels (C. Gardinier to R. Blank July 23, 1992). The Region IX preliminary remediation goals are most conservative.

The attached comments address the Navy's presentation on June 10th and the data associated with PA-19, PA-43, and PA-41. Please contact me if you have comments or questions.

Sincerely,



Richard Draper, Ph.D.
Project Manager
(415) 768-3282

cc: M. Mitguard, EPA
C. Beach, EPA
Dan Stralka, EPA



Bechtel Environmental, Inc.

Comment on the Navy's Parcel A Data Presentation
June 10, 1993

Oral and Visual Presentations of Site Inspection Data

1. Future presentations of site inspection data should be more comprehensive. All relevant available information should be presented, including the results of previous investigations.
2. For each preliminary assessment site the presentation should include a detailed discussion of the missions and operations associated with the site and identification of specific chemicals and chemical products used in operations associated with the site.
3. The rationale for selecting specific analytical methods, sampling locations and the number of samples should be discussed. This discussion should describe the ability of the selected analytical methods to detect and identify the chemicals associated with operations at the site. The discussion should also describe the strengths and weaknesses of the selected sampling strategy.
4. A detailed description should be provided of the rationale for selecting chemicals of concern. This discussion should be accompanied by a flow chart detailing the decisions necessary to eliminate chemicals from further consideration.
5. Summary tables that compare observed concentrations with threshold background concentrations, EPA Region IX preliminary remediation goals, and/or health based levels should be provided.
6. Figures illustrating the vertical and lateral extent of contamination associated with each chemical of concern should be presented. Concentrations in excess of background levels, EPA Region IX preliminary remediation goals, and/or health based levels should be highlighted by using a different symbol to indicate the sample location.
7. The data presented in the figures described above should be analyzed by referring to the specific chemicals and chemical products that may have been used at the site. If chemicals have been found, other than those which may have been used at the site, then provide possible rationales for their occurrence.
8. Future site inspection data presentations should be followed up by an informal detailed technical meeting.

Preliminary assessment site 19

1. Arsenic and manganese have been consistently found at levels above Region IX's preliminary remediation goals. However, the observed levels are below the Navy's threshold background levels and below the 95% upper confidence limit background levels.
2. Surface soil concentrations of Aroclor 1254 are greater than ten times Region IX's preliminary remediation goals. However subsurface concentrations were non-detectable. The Navy's proposal to remove additional soil from the planters at this site should reduce the Aroclor concentrations. Prior to excavation the Navy should consider the use of field screening methods or sampling to better define the required vertical extent of excavation.

3. Arsenic and Aroclor 1254 appear to be the greatest contributors to the excess cancer risk associated with this site. Based on the health risk screen provided by the Navy, if the risk associated with Aroclor 1254 can be reduced, total excess cancer risk associated with the site could be reduced to less than 1×10^{-4} .

Preliminary assessment site 43

1. Arsenic, manganese, and nickel have been consistently found at levels above Region IX's preliminary remediation goals. Lead concentrations may also be elevated, however, no preliminary remediation goal has been established for lead. In the southern portion of the site, arsenic concentrations exceed the Navy's threshold background levels and the 95% upper confidence limit background levels.
2. The Navy should provide detailed evidence to support the contention that MCPA (2-methyl-4-chlorophenoxyacetic acid) and MCPP (2-(2-methyl-4-chlorophenoxy) propionic acid) have not been found at the site. Both herbicides, and especially MCPA, have been used in large volumes for many years to control broad leaf weeds on right-of-ways, turf, and lawns. If present, the observed concentrations do not exceed the Region IX preliminary remediation goals. In addition both compounds have relatively low toxicities. (Also applicable to PA-50).
3. The maximum observed concentrations of benzo(a)pyrene and dibenz(a,h)anthracene exceed Region IX's preliminary remediation goals.
4. Arsenic, benzo(a)pyrene, and dibenzo(a,h)anthracene are the greatest contributors to the excess cancer risk associated with this site. The Navy's proposal to remove soil containing relatively high arsenic levels should reduce the risk associated with arsenic exposure and the total risk associated with the site to less than 1×10^{-4} .
5. To better define the vertical extent of the proposed excavation, the Navy should collect sub-surface soil samples for arsenic analysis in the southern portion of the site.

Preliminary assessment site 41

1. Arsenic has been consistently found at levels above Region IX's preliminary remediation goals. However, the observed levels are below the Navy's threshold background levels and the 95% upper confidence limit background levels. Tetrachloroethene was found in one sample in excess of the Region IX preliminary remediation goals and elevated levels of PAHs were found in two samples collected from the excavated area north of the parking lot.
2. The Navy's health risk screen for this site did not include metals. The Navy's proposal to excavate the soil containing relatively high levels of PAHs should, however, significantly reduce the total excess cancer risk associated with the site. Prior to excavation the Navy should collect subsurface soil samples to better define the vertical extent of PAH contamination.
3. The Navy should more carefully address the possibility of VOC contamination at this site. Historical usage data should be presented, if available.