



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

JUN 24 1994

Richard Powell
Western Division
Naval Facilities Engineering Command
900 Commodore Drive (09ER1)
San Bruno, CA 94066-2402

Subject: Final Site Assessment Report

Dear Mr. Powell:

Thank you for the series of opportunities you have afforded the agencies to visit the Hunters Point Annex site and in particular the recently identified Site Assessment (SA) sites. Both the Final Site Assessment Report and site visits have been very informative.

Enclosed please find our comments and recommendations related to the SA effort. If you should have any questions, please contact me at (415) 744-2409.

Sincerely,

A handwritten signature in cursive script that reads "Alydda Mangelsdorf".

Alydda Mangelsdorf
Remedial Project Manager

Enclosure

cc: R. Ramos, WESTDIV
C. Shabahari, WESTDIV
R. Hiett, RWCQB
A. Brownell, SFPHD

**Comments on the Navy's Final Site Assessment Report
Potentially Contaminated Sites Parcels B, C, D, and E**

1. The Navy should compile and publish a master inventory of every existing and suspected man-made feature at Hunters Point; all buildings, former building locations, foundations, transformer locations, former transformer locations, underground storage tanks, former underground storage tanks, sumps, vacant lots, scrap yards, dry docks, vaults, etc. A consistent and objective set of criteria should be developed, published and applied to screen the master inventory for features that represent potential sources and releases of environmental contamination. The list of features that represent potential sources and releases of contamination should then serve as the starting point for a site assessment. Documentation of a global screening is necessary to verify that all potential sources and releases have been identified at Hunters Point.
2. The Navy should develop and document a consistent set of recommendations for further investigation of similar potential sources and releases. For example, sumps in different buildings, which require further investigation, should be consistently sampled. Similarly, cracked flooring associated with a leaking container should receive consistent evaluation through-out the site. In addition, the Navy should define and consistently distinguish house-keeping activities from CERCLA remediation.
3. During the tour of site assessment areas proposed for further investigation several unknown features were observed; for example, two large liquid filled vaults on the Regunning Pier. Navy personnel present on the tour were unable to address the nature of these features and specifically why they were excluded from further evaluation. As discussed in comment 1, the Navy should be able to confidently address all man-made features at Hunters Point and whether these feature represent sources or releases of contamination.
4. **SA-76, Dry dock 5, 6, 7.** Because sand blasting occurred in these dry docks, sediment sampling should be conducted as part of further work in this area.
5. **SA-89, Former Building 278.** The evidence that this area represents a contaminant source or release does not justify sampling. The Navy should consider removing this area from the SA program.
6. **SA-127, Storehouse.** The evidence that a release to the environment occurred in the parking lot north of Building 407 does not justify sampling. The Navy should consider removing this area from the SA program.

7. **SA-128, Sheet Metal Shop.** The evidence that a release to the environment occurred in Building 439, which was never used, does not justify sampling along H Street. If a more thorough records search indicates the utilities were used, then sampling may be appropriate.

8. **SA-137, Building S-308.** The borings proposed in the area north-west of Building 307 should be located in accordance with a hot spot search grid.