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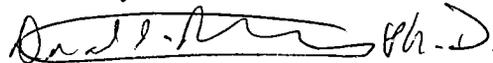
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Dear Richard,

Please find enclosed one copy of ARC's comments on the **Draft Summary Report of Phase I and Phase II UST Removals and Closures in Place**. In addition, I am also interested in exploring the possibility of obtaining projection slides of some of the photographs included in the report.

Should you have any questions regarding these comments or my request for the slide material, please contact me at the above number.

Yours Sincerely,



Donald Meyers, Ph. D.

Distribution:

Naval Facilities Engineering Command, Western Division (Attn: Richard Powell)

cc:

U.S. Environmental Protection Agency (Attn: Alydda Mangelsdorf)
California Regional Water Quality Control Board, San Francisco Bay Region
(Attn: Richard Hiatt)

City and County of San Francisco, Department of Public Health (Attn: Amy Brownell)
Citizens Advisory Committee/Chair, Environmental Committee (Attn: Willie McDowell)

The New Bayview Committee (Attn: Sam Murray)

San Francisco Redevelopment Agency (Attn: Byron Rhett)

California Department of Toxic Substances Control, Site Mitigation Branch (Attn: Cyrus Shabahari)

Bay Conservation and Development Commission (Attn: Jennifer Ruffolo)

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NAVSTA Treasure Island (Attn: CDR A. Elkins, Bay Area Base Transition Coordinator)

National Oceanic and Atmospheric Administration (Attn: Denise Klimas)

U.S. Department of the Interior (Attn: Allen McReynolds)

U.S. Fish and Wildlife (Attn: Jim Haas)

California Department of Fish and Game (Attn: Mike Martin)

Bay Area Air Quality Management District (Attn: Catherine Fortney)

Agency for Toxic Substances and Disease Registry (Attn: Joan Davis)

San Francisco District Attorney (Attn: John Cooper)

Law Offices of Leslie R. Katz (Attn: Leslie Katz)

**Comments on
Draft Summary Report of
Phase I and Phase II
UST Removals and Closures in Place

Naval Station Treasure Island
Hunters Point Annex**

General Comments

Overall, the standard of the removal work appears to be high and the planned remedial investigations appear to be thorough. The standard of presentation and clarity of the report is, in general, above average. The inclusion of color photographs was greatly appreciated.

One area in which the report could be improved, is in the summary of the chemical analyses. The important information here is not the absolute concentration of a chemical but rather the concentration relative to the chemical's toxicity. For example, in the groundwater sample taken as UST site 27, the CLP volatiles include, in increasing concentration, ethyl benzene, benzene, toluene and xylene. The text notes that xylene was present at the highest concentration and that benzene was also detected. The emphasis here, however, should be on benzene, as it is toxic at much lower levels than xylene, as evidenced by its maximum contaminant level, which is more than three orders of magnitude lower than that of xylene.

Reference is made in a number of tables to Lead-GF, Lead-ICP and Organic Lead. As each of these methods differ in sensitivity and in the form of lead they are designed to measure, a technical note and rationale for use should be included.

The report could be made somewhat easier to read with two minor changes. First, as far as possible, the same units of measure should be used throughout the tables in Appendix B. As written, units alternate continually between $\mu\text{g}/\text{Kg}$ and mg/Kg . Second, the sample IDs in all the tables need to be readily distinguishable from the various subdivisions of the analytes. The use of page-width shaded bars for all sample ID headings and analyte subdivisions makes it difficult to locate individual samples.

Specific Comments.

UST Site 4. The position of UST site 4 in Appendix A, Figure 2 and Appendix A, Figure 6 is inconsistent.

UST Site 5. The position of UST site 5 (S-209 and 210) in Appendix A, Figure 2 and Appendix A, Figure 7 is inconsistent.

UST Site 6. The position of UST site 6 (S-211, 212 and 213) in Appendix A, Figure 2 and Appendix A, Figures 8, 9 and 10 is inconsistent.

S-211: It should be made clear in the text that the soil samples were taken from around the tank.

S-213: It is not clear whether soil samples S213-B10 and B11 were tested for total petroleum hydrocarbon (TPH). The absence of levels in Table 11, suggests that TPH was not detected. This is an important point in this situation, as there is substantial TPH contamination in the southern most sample site (S213-B12).

UST Site 9. Appendix B, Table 1 should be altered to show that Tank HPA-01 was used to store methanol in addition to diesel

UST Site 11. On page 60 of the report, section 3.14 is headed "UST SITE 10: TANK HPA 11". This should read UST SITE 11: TANK HPA 11.

UST Site 15. Appendix B, Table 1 lists TANK S-219 as containing gasoline/diesel while the text states that it was used to store waste solvent. This inconsistency should be corrected.

UST Site 17. Please clarify whether TANK HPA-02 is east or west of TANK HPA-03.

UST Site 19. There is a conflict in the reported lower level for xylene. At the top of page 95, the low end of the range is reported for sample S001-S2 at 100 mg/Kg whereas Appendix B, Table 26 lists the level at this sample site as 100 µg/Kg.

UST Site 20. The closure-in-place of this tank, which sits in a region containing substantial contamination, may prove to have been short sighted. The presence of high concentrations of heavy metals, polynuclear aromatic hydrocarbons (PAHs) and petroleum hydrocarbons, combined with the fact that most of the contamination appears unrelated to the contents of the tank, suggests that a large release requiring remediation has occurred in the vicinity.

Including the chemical name and/formula for the "paint thinner" that was stored in this tank would be helpful.

What is the origin of 4, 4'-DDT at eight feet below ground surface?

UST Site 22. Lead appears twice in the CLP - Metals section of Table 22, Appendix B, Sample ID: HPA33-S3.

UST Site 24. No description or sampling of Building 308 or the large vault associated with UST Site 24 appears in the Site Inspection Report for Parcel D (Harding Lawson Associates, May 1994). As fuel lines connect the vault and Tank HPA-308, inspection of the vault for contamination is warranted.

UST Site 25. There is no mention of groundwater in section 3.30.1, 2 or 3. If groundwater was not encountered during removal of these tanks, it should be stated explicitly.

UST Site 27. Labeling of sample sites for UST Site 27 is inconsistent. In the text and Tables 38 through 42 in Appendix B, Sample sites are referenced with the suffix S1, S2 or SC1, while Figure 33 lists sample sites S1 through S10, SC1 and SC2 and GW, which is in between tanks S-11 and S12.

As an example of the confusion that results, Table 38, which is headed "UST Site 27: Tanks S-711 and S-712", refers to a sample ID S709-S1, suggesting that it refers to Building 709, sample site S1, which is a few feet west of Tank HPA-14. Table 41, however, refers to Tank HPA-14 and includes the sample IDs HPA14-S1 and HPA14-SC1.

In Tables 38 through 40, which covers tanks S711 through S715, no sample ID with a suffix higher than S2 appears, whereas the sample sites labeled on Figure 33 for these tanks range from S3 to S10.

Table 42 refers to tank HPA-15 with sample IDs HPA15-SC1 and HPA-S1. These sample sites are listed on Figure 33 as SC1 and S2 respectively.

Some sample IDs refer to two tanks, for instance S711/712-S1 and S2. There is no way of identifying which sample sites these correspond to on Figure 33. It cannot be assumed that these IDs refer to sample sites roughly equidistant from the two tanks, as the groundwater sample site is identified as S711/714-GW when the sample site on Figure 33 is between tanks S711 and S712.

This list of inconsistencies is not exhaustive and highlights the need to clarify this section.

UST Site 28. Labeling of sample sites for tank S-802 in Figure 34 is inconsistent with the text and with Table 43 of Appendix B. Figure 34 references sample sites S5 through S8 for tank S-802 whereas the text and Table 43 reference sites S1 through S4.