



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

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HUNTERS POINT
SSIC NO. 5090.3

AUG 30 1994

Dave Song (09AR1DS)
Western Division
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402

Subject: Parcel E Draft Final Site Inspection Report

Dear Mr. Song:

We are in receipt of the Draft Final Parcel E Site Inspection (SI) Report dated July 15, 1994. Thank you for the opportunity to review and comment on it. This letter and all of the attachments constitute our review.

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. The Navy extended the review period for this document to 45 days asking for comments by August 30, 1994.

The U.S. Environmental Protection Agency (U.S. EPA) partially approves the Draft Final Parcel E SI Report/RI Work Plan as a final document. In particular, those portions of the report which describe the SI data collection methods and findings are approved. Further, U.S. EPA approves the conclusions and/or workplan elements identified for: PA-47, PA-39, and PA-40. Additional phases of data collection, however, may be required at these sites and others if the overall model of contamination and contaminant transport indicates that these sites and others may be impacted by means not considered as part of this source identification effort. Appendix A provides relevant comments which must be addressed.

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 B). 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 C contains a summary of our discussion of May 13, 1994 and provides the basis for our partial approval of the SI report/RI Work Plan.

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-45, PA-50, PA-51, PA-38, PA-52, PA-54, and PA-56. Appendix A 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. 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 down, up and/or cross-gradient.

As a final highlight, the proposed exploratory excavations must be scoped, planned and executed with agency participation. We have initiated this process with a meeting held on August 23, 1994 but a consensus on this matter has not yet been reached. We recommend continued dialogue amongst all the parties.

Please submit a response to these comments for our review prior to any meeting to resolve the outstanding issues. If you have any questions, please contact me at (415) 744-2409.

Sincerely,



Alydda Mangelsdorf
Remedial Project Manager

Attachments

cc: RAB members

**Comments on the Navy's
Draft Final Parcel E Site Inspection Report**

1. The Navy should account for all known current and former transformer locations and all suspected former transformer locations. This account should include an assessment of transformers known to have been removed from undocumented locations. See EPA's 11/2/93 comment No. 2.
2. The Navy should bore to groundwater and collect grab groundwater samples from borings proposed in PA-52. See EPA's 11/2/93 comment No. 3.
3. In many cases the Navy does not propose additional RI work when contaminants present at concentrations above health based levels are considered to represent non-point source releases. The Navy should develop and document quantitative criteria to distinguish between point source and non-point source contamination. These criteria may be based on a spatial analysis of specific contaminant or contaminant class occurrence (e.g., saturated hydrocarbons, halogenated unsaturated hydrocarbons, phenols, organochlorine insecticides, organophosphate insecticides). The analysis should consider the contaminant or contaminant class handling and usage practices, environmental fate, and transport mechanisms. See, for example, EPA's 11/2/93 comments Nos. 4, 5, and the Evaluation of the Navy's Parcel E Preliminary Assessment Site Remedial Investigation Work Plans which accompanies these comments for specific areas requiring further rationale.
4. The Hunters Point facility boundary adjacent to Parcel E extends several hundred feet into the Bay. There are potential pathways of contaminant migration, either from Parcel E sources or through Parcel E from other parcels which may contribute risk to biota which reside in, or rely on, the bay. In response to EPA's 12/16/93 comment No. 1, the Navy indicates data from the sanitary sewer, steam lines, and storm drain lines were not compared to HBLs because there is no exposure pathway. Storm drains, however, represent an aquatic receptor exposure pathway as may old sewer lines, steam lines, vaults, sumps, and floor drains. The RI work plan should be integrated with the ecological risk assessment, where possible. This plan should identify and incorporate criteria to screen on shore data for potential to cause ecological risk to the intertidal and near shore ecosystems and include sampling locations appropriate for determining the extent to which shore based contaminants have migrated to the bay.
5. The Navy and EPA should agree on the scope of removal actions, remedial actions, housekeeping activities, and routine facility maintenance. See EPA's 12/16/93 comment Nos. 2 and 6.
6. The SI report should include an integrated discussion of the IR, SI, and SA results, conclusions, and recommendations for all of Parcel E. This comprehensive preliminary

conceptual model of the site should identify the individual contaminants and/or classes of contaminants that are of concern across Parcel E, illustrate exposure pathways for human and other biological receptors, and summarize the areas that are of concern as well as the historical operations associated with each of these areas. See EPA's 5/11/94 general comment Nos. 3, 4, 5, and specific comment No. 37.

7. In response to EPA's 5/11/94 general comment No. 10, the Navy should alter the name and or acronym for the Navy's own internal Base Closure Team or BCT. It is unnecessarily confusing to identify two separate groups by this name and acronym. If need be, the Navy's internal BCT could be identified as Internal WESTDIV BCT.
8. In response to EPA's 5/11/94 general comment No. 11, the Navy should better respond to the Restoration Advisory Board suggestion that the Public Summary provide an assessment of the purpose and findings of the Site Inspection, but in an abbreviated, user-friendly format and language.
9. In response to EPA's 5/11/94 specific comment No. 11, the Navy should address the observation that analytical detection limits for beryllium are greater than EPA Region 9 preliminary remediation goals. The analytical detection limits for analytes of concern should be lower than levels of interest for risk assessment,
10. In response to EPA's 5/11/94 specific comment No. 42, the Navy should propose the soil capping as an interim action with the appropriate agency consultation, public involvement, and documentation.
11. In response to comment No. 1 of the 5/5/94 EPA memorandum from Matthew Hagemann to Alydda Mangelsdorf, the Navy says that "the type and quantity of data requested for the CBEC report format were not a component of the SI work plans and therefore were not provided in the Parcel E SI report." With this, the Navy does not acknowledge that the Parcel E RI work plan should be revised to fill gaps in the current understanding of tidal influence on groundwater flow and the quantification of aquifer and hydrogeologic characteristics. These issues should be addressed in the RI work plan or associated parcel conceptual model presentations.

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

| PA Site | Description | RI Work Plan Concurrency | Comments or Rationale |
|---------|---|-----------------------------|--|
| PA-45 | Steam Lines | Concur Do not concur | Navy to remove friable asbestos outside the RI program. Removal of oil contaminated fluids should be conducted as part of RI program. Navy should develop arguments for the RI report to support the representativeness of steam line sampling points. The Navy should verify that analytical detection limits will support risk assessment data requirements. |
| PA-47 | Fuel Distribution Lines, Tank S-505 | Concur | No further comments. |
| PA-50 | Storm Drain and Sanitary Sewer Systems | 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 should be collected at storm drain outfalls. |
| PA-51 | Former Transformer Sites | Do not concur | Further rationale should be provided for not considering areas contaminated with Aroclors for further investigation. |
| PA-38 | Former Buildings 507 and 509 | Do not concur | Further rationale should be provided for not considering areas contaminated with As and Be for further investigation. |
| PA-39 | Building 707 NRDL Animal Colony | Concur | No further comments. |
| PA-40 | Building 527 Electrical Substation | Concur | No further comments. |
| PA-52 | Offsite Railroad Right-of-Way | Do not concur | The Navy should bore to groundwater, collect, and analyze groundwater samples in addition to soil samples. |
| PA-54 | Former Building 511A Woodworking Hobby Shop | Do not concur | Further rationale should be provided for not considering areas contaminated with benzo(a)pyrene for further investigation. |

| PA Site | Description | RI Work Plan Concurrence | Comments or Rationale |
|---------|--|-----------------------------|---|
| PA-56 | Area VII, Railroad Tracks and UST Site | Do not concur | Further rationale should be provided for not considering areas contaminated with PAHs and As for further investigation. |



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75 Hawthorne Street
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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 C
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.