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From: Commanding Officer, Engineering Field Activity West  
To: Distribution

Subj: HUNTERS POINT ANNEX PARCEL A RI/SI SCOPING MEETING ON  
JANUARY 11, 1995

Encl: (1) January 20, 1995 PRC Environmental Management, Inc letter

1. Enclosure (1) contains the summary of the subject meeting, and it is forwarded for your review and reference.

2. If you have any questions regarding this letter, please contact either myself at (415) 244-3596, or Mr. William Radzevich at (415) 244-2555.

**Original signed by:**

RICHARD E. POWELL  
By direction

**Distribution:**

U.S. Environmental Protection Agency (Attn: Alydda Manglesdorf)  
Cal EPA, Department of Toxic Substances Control (Attn: Mr. Cyrus Shabahari)  
Regional Water Quality Control Board (Attn: Mr. Richard C. Hiett)  
PRC Environmental Management (Attn: Mr. James Sickles, w/o encl)  
Harding Lawson Associates (Attn: Mr. David Leland, w/o encl)

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January 20, 1995

Mr. William Radzevich (Code 09ERIWR)  
Department of the Navy  
Engineering Field Activity West  
Naval Facilities Engineering Command  
900 Commodore Drive, Building 101  
San Bruno, CA 94066-2402

**Subject: Summary of Hunters Point Annex Parcel A RI/SI Scoping Meeting Held on January 11, 1995, at PRC Environmental Management, Inc., San Francisco, CA**

Dear Mr. Radzevich,

This letter is a summary of the meeting at PRC Environmental Management, Inc. (PRC) on January 11, 1995, with the Navy, U.S. Environmental Protection Agency (EPA), Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB), PRC, and Harding Lawson Associates (HLA). The meeting was held to discuss the scope of the remedial investigation and site inspection reports for Parcel A at Hunters Point Annex (HPA). The meeting opened at 1:00 p.m. and concluded at 5:25 p.m. The agenda, outline for the Parcel A remedial investigation (RI), and proposed Parcel A schedule are attached. Items discussed and action items are as follows:

#### Discussion Items

The first item discussed was a summary of the sandblast/pesticide investigation.

- EPA will pick a sample delivery group (SDG) to check the validation. The Navy will complete the sample validation summary reports for the sandblast/pesticide investigation and send them to the EPA.
- DDT detected in one surface sample at a concentration of 0.45 parts per million (ppm) and not detected at depth, north of the lot, was discussed at length. EPA will discuss this issue internally. Concentrations of DDT in soil in residential areas from across the country (345 samples) range from 0.01 to 5.86 ppm.
- DTSC wanted future residents to be notified that DDT was detected in the weep holes in the retaining wall at this lot, if the DDT is not removed. The City of San Francisco plans to raze all of the structures on Parcel A.

The second item discussed was the status of the drilling and installation of the groundwater monitoring well in the parking lot at building 101, in Parcel A. On January 12, 1995 the development crew will begin developing the well.

Navy's proposed Parcel A SI/RI report scope consists of the following.

- Revise the October 1993 Parcel A SI report incorporating the addenda into the text. The SI would contain all of the Parcel A soil investigations, including the one for sandblast/pesticide.
- The Parcel A RI would include the groundwater investigation and summaries of the Parcel A soil investigations.

Regulatory Agency's counter proposal for Parcel A SI/RI report scope.

- Stop work on the Parcel A SI report; leave in the draft final stage.
- Include the soil investigations in the RI report along with the groundwater investigation. This will mean one less comment period on the documents.
- The EPA wants a more detailed fate and transport section and an ARARs section added to improve the Parcel A SI report. These two sections would also be included in the RI report. The fate and transport section could be a paper study. The human health risk assessment in the SI report and the qualitative ecological risk assessment conducted by EPA for Parcel A would be adequate for the RI report.
- The sites with contamination will be discussed in more detail and the sites with minimal contamination will be summarized.
- EPA wants the highest concentrations at each of the soil investigation sites included in the summaries because of the length of time the contaminants were in the soil and the possibility of leaching to the groundwater.

After a caucus the Navy revised its proposal for the Parcel A RI report. The following proposed items will need to be agreed on by the agencies before the Navy can concur on the preparation of an RI report only and stopping work on the SI report.

1. Prepare ARARs for chemicals with residential risk analysis greater than  $10E-6$
2. Human health risk assessment currently in the Parcel A SI report is adequate
3. Eco-risk assessment prepared by EPA is complete and satisfactory, and ecological ARARs would not be reviewed
4. Prepare fate and transport for those compounds with risk analysis greater than  $10E-6$
5. Feasibility study for soils is not necessary

The schedule for the Parcel A RI and ROD was discussed, although it was set up based on the original proposal.

DTSC had a few immediate comments and will review the Navy's proposed schedule further and will send additional comments.

The regulatory agencies recommended that the Parcel A boundaries be changed to exclude those areas that contain portions of chemical plumes which originate in other parcels.

Action Items

1. The EPA will provide the Navy with a reference identifying raptor egg shell thinning at a DDT concentration of 0.1 parts per million.
2. The Navy will send the EPA copies of the validation reports for the sandblast/pesticide investigation.
3. The EPA will conduct a quality control review of the laboratory data. After concurrence with the data validation results, the EPA and DTSC will contact the Navy regarding backfilling of the areas of the lot that have been excavated for the sandblast investigation by January 13, 1995. The EPA and DTSC will provide their recommendation for the area with DDT detected at 0.45 ppm.
4. The regulatory agencies will prepare an outline for the Parcel A RI report.
5. For discussion purposes the Navy and its' contractors, and the regulatory agencies will each prepare a draft summary of the PA-43 write up and outline of the sections necessary for inclusion in the RI report.
6. EPA will discuss an internal EPA memo (from Matt Hagemann to Alydda Mangelsdorf) of items that need to be addressed in the Parcel A RI report.
7. The regulatory agencies will look at the proposed Parcel A schedule and send comments to the Navy.

Sincerely,



Scott Weber  
Assistant Project Manager

cc: Richard Powell, Navy  
Michael McClelland, Navy  
Jim Sickles, PRC  
Carl Michelsen, HLA  
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## **AGENDA**

**Hunters Point Annex Parcel A  
SI/RI Scoping Meeting  
PRC Environmental Management, Inc. San Francisco  
January 11, 1995, 1 p.m.**

1. Summary of Field Work Parcel A
  - Sandblast Grit Investigation
  - Groundwater Investigation
2. Navy's Proposed Parcel A SI/RI Scope
  - SI/RI Scope
  - Justification
3. Navy's Proposed Parcel A SI/RI Schedule
4. Agencies Responses/Discussion
5. Other Parcel A Topics
6. Action Items

**DRAFT OUTLINE  
IR-59 RI/FS  
HUNTERS POINT ANNEX**

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1.0 INTRODUCTION

- 1.1 Purpose and Scope of Work
- 1.2 Facility-Wide Investigation Program
- 1.3 Report Organization

2.0 BACKGROUND AND SITE HISTORY

- 2.1 Site Description
- 2.2 Previous Investigations
  - 2.2.1 Parcel A Site Inspection
    - 2.2.1.1 PA-19, Summary of Current Conditions
    - 2.2.1.2 PA-41, Summary of Current Conditions
    - 2.2.1.3 PA-43, Summary of Current Conditions
    - 2.2.1.4 PA-50, Summary of Current Conditions
    - 2.2.1.5 UST S-812, Summary of Current Conditions
    - 2.2.1.6 Jerrold Avenue Lot, Summary of Current Conditions
  - 2.2.2 Other Investigations

3.0 GENERAL PHYSICAL CHARACTERISTICS

- 3.1 Land Use and Topography
- 3.2 Surface Water Drainage
- 3.3 Geologic and Hydrogeologic Setting
- 3.4 Ecology

4.0 REMEDIAL INVESTIGATION AT IR-59, PARCEL A GROUNDWATER

- 4.1 Methods of Investigation
  - 4.1.1 Source Area Evaluation
  - 4.1.2 Drilling and Monitoring Well Installation
  - 4.1.3 Aquifer Testing
  - 4.1.4 Surface Water Sampling
  - 4.1.5 Sampling and Laboratory Analysis
- 4.2 Findings
  - 4.2.1 Source of Motor Oil
  - 4.2.2 Geology
  - 4.2.3 Hydrogeology
    - 4.2.3.1 Groundwater Hydraulics and Flow
    - 4.2.3.2 Groundwater Quality
    - 4.2.3.3 Surface Water Flow and Quality
  - 4.2.4 Nature and Extent of Contamination
  - 4.2.5 Contaminant Fate and Transport
    - 4.2.5.1 Potential Migration Pathways
    - 4.2.5.2 Contaminant Mobility and Persistence

5.0 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

- 5.1 Definition of ARARs
- 5.2 ARAR Categories
- 5.3 ARARs Related to Groundwater Remedial Alternatives

6.0 GROUNDWATER RISK ASSESSMENT [PRC]

- 6.1 Human Health Risks/Ecological Risks
- 6.2 Derivation of Target Remedial Goals

7.0 IR-59, GROUNDWATER FEASIBILITY STUDY

- 7.1 Definition of Remedial Units
- 7.2 Remedial Action Objectives
- 7.3 Initial Screening and Evaluation of Remedial Technologies
- 7.4 Detailed Analysis of Remedial Alternatives
  - 7.4.1 Alternative 1 - No Action
    - 7.4.1.1 Overall Protection of Human Health and the Environment
    - 7.4.1.2 Compliance with ARARs
    - 7.4.1.3 Long-Term Effectiveness and Permanence
    - 7.4.1.4 Reduction of Toxicity, Mobility, and Volume of Contaminants
    - 7.4.1.5 Short-Term Effectiveness
    - 7.4.1.6 Implementability
    - 7.4.1.7 Cost
    - 7.4.1.8 State (Support Agency) Acceptance
    - 7.4.1.9 Community Acceptance
  - 7.4.2 Alternative 2 - Groundwater Extraction, Treatment, and Disposal
    - 7.4.2.1 Overall Protection of Human Health and the Environment
    - 7.4.2.2 Compliance with ARARs
    - 7.4.2.3 Long-Term Effectiveness and Permanence
    - 7.4.2.4 Reduction of Toxicity, Mobility, and Volume of Contaminants
    - 7.4.2.5 Short-Term Effectiveness
    - 7.4.2.6 Implementability
    - 7.4.2.7 Cost
    - 7.4.2.8 State (Support Agency) Acceptance
    - 7.4.2.9 Community Acceptance
- 7.5 Comparison of Remedial Alternatives and Selection of Preferred Alternative
  - 7.5.1 Comparison Based on CERCLA Criteria: Alternatives 1 and 2
  - 7.5.2 Selection of Preferred Alternative

8.0 SUMMARY AND CONCLUSIONS

- 8.1 Physical Characteristics
- 8.2 Nature and Extent of Contamination
- 8.3 ARARs
- 8.4 Risk Assessment
- 8.5 Remedial Alternative Selection

9.0 REFERENCES

Parcel A Groundwater Investigation  
Schedule Assumptions

**DRAFT**

January 11, 1995

This Parcel A Schedule is predicated on the following assumptions:

1. The scope of this schedule stems from the informal resolution of a dispute regarding characterization of the groundwater in the 50-acre upland portion of Parcel A; a petroleum sheen was subsequently found in the groundwater. No additional contamination will be identified in the Parcel A groundwater.
2. Regulatory agencies will review and respond to draft documents within 3 weeks of receipt. The Navy will address agency comments and submit draft final documents within 3 weeks of receipt of all regulatory agency comments
3. The draft final documents will serve as the final documents, with changes specified in the form of an addenda.
4. Summary of the soil data will be included in the RI report
5. List of appropriate ARARs will be agreed to by March 3, 1995.
6. The groundwater sampling (three samples) at the spring in front of building 101 will be completed by January 31, 1995.

**DRAFT**

SCHEDULE FOR PARCEL A

<u>Document</u>	<u>Deadline</u>	<u>Estimated Date</u>
Revised Final SI Report	3/24/95	-----
Draft Mini-RI Report	4/14/95	-----
Draft Mini-FS Report	4/28/95	
Draft Proposed Plan	with submittal of Draft Mini-FS Reports	4/28/95
Draft Final Mini-RI Report*	45 days after submittal of Draft Mini-RI Report	5/29/95
Draft Final Proposed Plan*	90 days after submittal of Draft Proposed Plan	7/31/95
Draft Final Mini-FS Report*	45 days after submittal of Draft Mini-FS Report	6/12/95
Final Proposed Plan Published	60 days after submittal of Draft Final Proposed Plan	9/29/95
Start of Public Comment Period on Draft Proposed Plan	5 business days after publication of Proposed Plan	10/4/95
Final Mini-RI Report*	30 days after submission of Draft Final Mini-RI Report	7/28/95
Final Mini-FS Report*	30 days after submission of Draft Final Mini-FS Report	7/12/95
Draft Record of Decision (ROD)	30 days after end of Public comment period on Proposed Plan	11/3/95
Final ROD (from USN with no signatures)	75 days after submittal of Draft ROD	1/17/96
Final ROD Approval	14 days after submittal of Final ROD	1/31/96

\* - Primary document subject to dispute resolution procedures, per Section 7.8.

Public Health and Environmental Evaluation (PHEE) is a Section in the Mini-RI/FS Report