



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

N00217.003151
HUNTERS POINT
SSIC NO.5090.3

September 25, 1995

William Radzevich
Remedial Project Manager
Engineering Field Activity, West
900 Commodore Drive
San Bruno, CA 94066-5006

RE: Preliminary Draft Record of Decision, Parcel A, Hunters Point Annex

Dear Mr. Radzevich:

EPA has reviewed the Preliminary Draft Record of Decision for Parcel A, Hunters Point Annex. As requested, we are providing our comments on this preliminary draft by September 25, 1995. Our comments are presented directly on the enclosed pages of the draft document or below.

- 1) Please include a table of contents.
- 2) Please note that the Navy need not include so much detail in the declaration statement. Please review exhibit 9-2 of EPA guidance on preparing decision documents (copy enclosed).
- 3) Please ensure that the draft ROD clearly and often explains that no further action was determined appropriate for the SI sites earlier in the process. Thus, by selecting no action for the two RI sites the Navy has effectively determined that the condition of the overall parcel is protective of human health and the environment and that the Parcel appears to be suitable for transfer.
- 4) Where is the section of the ROD entitled "Description of the No Action Alternative" per the EPA guidance (again, see enclosed copy of exhibit 9-2).
- 5) The preliminary draft record does not mention the deed notification for groundwater requested by the state. As I have previously stated, EPA does see the need to mention the deed notification in the ROD. The issue will come up in the responsiveness summary and be addressed there.
- 6) Prior to the responsive summary text, there should be a brief summary of the comments and responses. This is typically what is attached to the ROD. The point by point response to

specific comments is often so lengthy that it is included as a separate document in the administrative record. Again, this discussed under section 6.4 of the EPA guidance mentioned above as well as in an additional guidance document I have enclosed here for your review.

Should you have any questions about these comments, please do not hesitate to contact me at (415) 744-2409.

Sincerely,



Claire Trombadore
Remedial Project Manager

cc: Cyrus Shabahari, Cal/EPA
Scott Weber, PRC

**HUNTERS POINT ANNEX
PARCEL A**

**PRELIMINARY DRAFT
RECORD OF DECISION**

**(Pursuant to the Comprehensive Environmental Response,
Compensation, and Liability Act)**

October 1995

~~Issued By:~~

**U.S. Department of the Navy,
Engineering Field Activity West,
Naval Facilities Engineering Command**

~~and~~

~~U.S. Environmental Protection Agency
Region IX - San Francisco, California~~

1.0 DECLARATION FOR NO ACTION AT PARCEL A

1.1 SITE NAME AND DESCRIPTION

Engineering Field Activity West (EFA WEST)
Hunters Point Annex, Parcel A
San Francisco, California

This federal facility ^{was placed} is on the National Priorities List (NPL). Hunters Point Annex (HPA) was deactivated and placed in industrial reserve in 1974. ^{In 1989} In 1991, HPA was selected and approved for closure under the Base Realignment and Closure (BRAC) program.

1.2 STATEMENT OF BASIS AND PURPOSE

This decision document presents the selected remedial action for Parcel A at the HPA in San Francisco, California, which was chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

This decision is based on the administrative record for the site. The administrative record index is Attachment A of this Record of Decision (ROD).

The State of California ^{and the United States Environmental Protection Agency (US EPA)} concurs with the selected remedy.

1.3 DESCRIPTION OF THE SELECTED REMEDY : NO ACTION

The U.S. Department of the Navy (Navy) and the U.S. Environmental Protection Agency (EPA) Region IX have selected no action for the following sites at Parcel A of HPA:

- IR-59: The groundwater underlying Parcel A

- IR-59 Jerrold Avenue Investigation (JAI): The soil at a residential lot on Jerrold Avenue within Parcel A

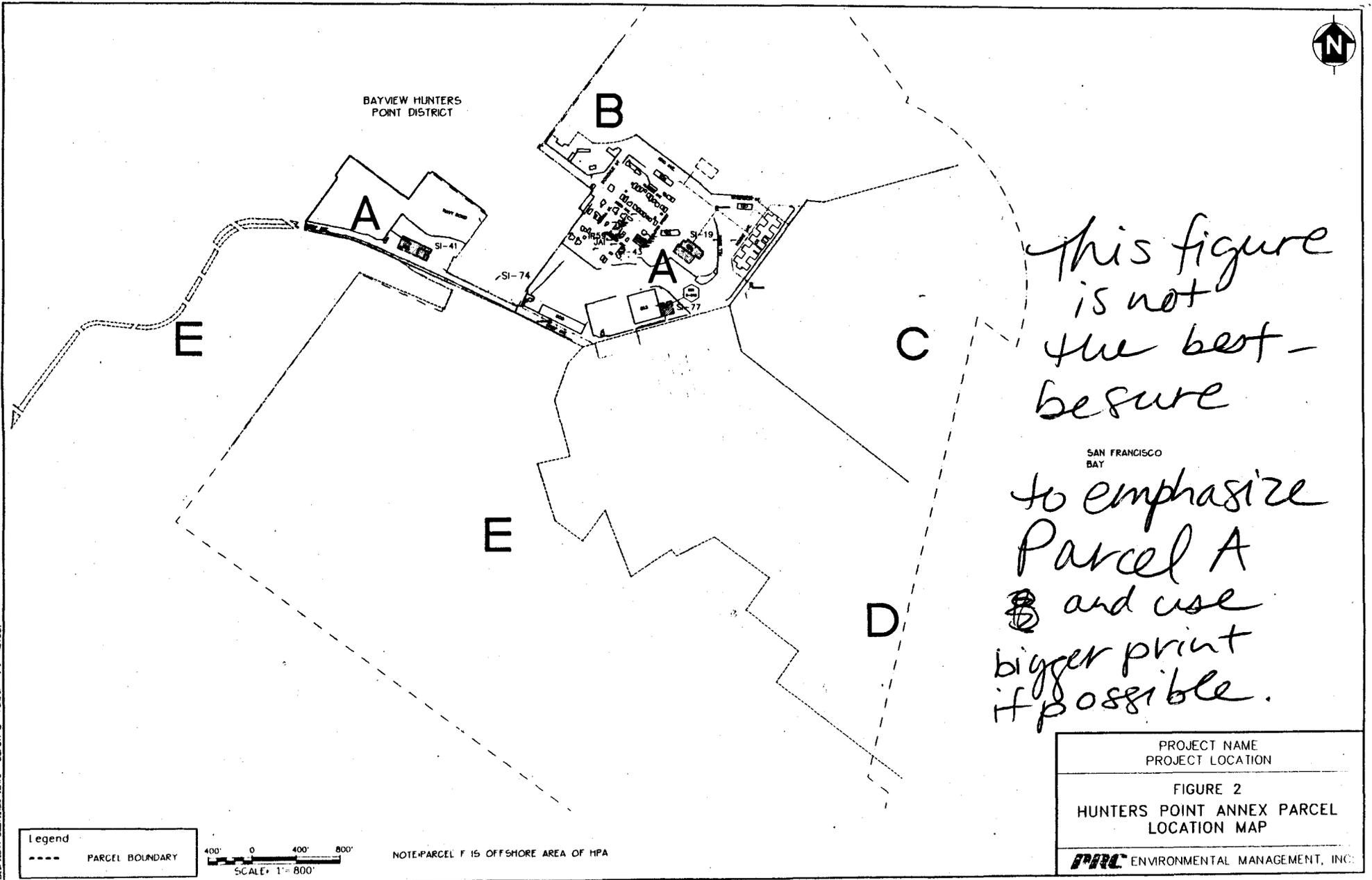
These sites are the only two sites at Parcel A that were carried through to the remedial investigation ^{determined} (RI) stage. All other sites investigated on Parcel A were ~~found~~ to require no further action at the conclusion of the SI stage of ~~Parcel A~~ investigations.

1.4 DECLARATION STATEMENT

Based on an evaluation of analytical data and other information, the Navy, EPA Region IX, and the California Environmental Protection Agency (Cal/EPA) have determined that no remedial action is necessary to ensure the protection of human health and the environment at Parcel A. Specifically, this ROD selects the final remedy for sites IR-59 and IR-59 JAI at Parcel A. The groundwater underlying Parcel A (IR-59) is not a potential source of drinking water. The semivolatile organic compounds (SOC) and metals detected in groundwater samples were ^{concern with the Navy's determination} present only at concentrations [^] were not found to exceed below EPA Region IX preliminary remediation goals (PRG). The only other substance detected, motor oil, is a petroleum product specifically excluded from the definition of "hazardous substance" and "pollutant or contaminant" in Section 101 of CERCLA. Accordingly, the Navy is prevented ⁺ from taking a response action on the groundwater under CERCLA authority. Although the State of California has authority to regulate the remediation of motor oil in groundwater, the State concurs that the levels in groundwater do not require further investigation, remediation, or groundwater monitoring (RWQCB 1995b). The concentrations of hazardous substances in the soil at IR-59 JAI are either within or below EPA's acceptable risk levels or, for metals, are at background levels. There

spacing here?

Please note: With the exception of section 1.4 sentences 1 and 2 and the last sentence, ~~at the end of~~ section 1.4 goes into much greater detail that necessary. Please see Exhibit 9-2, page 9-5 of EPA guidance document on RODs, OSWER Directive 9355.3-02. Could simply say no action is appropriate based on the fact that no unacceptable risks are present in soil or gw at Parcel A.



BAYVIEW HUNTERS
POINT DISTRICT



*this figure
is not
the best -
be sure*

SAN FRANCISCO
BAY

*to emphasize
Parcel A
and use
bigger print
if possible.*

Legend
--- PARCEL BOUNDARY



NOTE: PARCEL F IS OFFSHORE AREA OF HPA

PROJECT NAME PROJECT LOCATION
FIGURE 2 HUNTERS POINT ANNEX PARCEL LOCATION MAP
EMRC ENVIRONMENTAL MANAGEMENT, INC.

S:\SF\2004-0287\REC-12MG - 06/07/09 - Planref - 1.dwg - 8/10/09

move to previous page

are no other sites on Parcel A that require investigation or remediation. Accordingly, because hazardous substances are not present at Parcel A at concentrations above acceptable risk levels, the 5-year review requirement of CERCLA Section 121(c) does not apply.

(Name)
(Title)
Navy EFA WEST

Date

~~Ms. Felicia Marcus~~ *Julie Anderson*
~~Regional Administrator~~ *Chief, Federal*
~~EPA Region IX~~ *Facilities Cleanup Office*

Date

(Name)
(Title)
Department of Toxic Substances Control
Cal/EPA

Date

2.0 DECISION SUMMARY FOR PARCEL A

2.1 SITE NAME, LOCATION, AND DESCRIPTION

HPA is located on a promontory in southeast San Francisco (see Figure 1). The promontory is bounded on the north and east by the San Francisco Bay and on the south and west by the Bayview-Hunters Point district of the City of San Francisco. The entire HPA covers 936 acres, 493 of which are on land and 443 of which are under water. To facilitate the environmental investigation and remediation, and ^{to the City of San Francisco} ultimate transfer of the property, HPA was divided into Parcels A through F (see Figure 2). This ROD addresses the remedy for sites at Parcel A.

Please make sure Parcel A stands out - shade it or something.

Parcel A is bounded by the other portions of HPA and the Bayview-Hunters Point district (see Figure 3). Parcel A covers approximately 88 acres. Land use adjacent to Parcel A is residential or, in the case of other HPA parcels, currently undergoing investigation and remediation for future redevelopment. Under ^{San Francisco's Proposed B-F} ~~the Community Reuse~~ Plan, these parcels will ultimately be used primarily for commercial and industrial purposes. *(March 1995)*

while Parcel A will remain largely residential.

Parcel A consists of the upland area of HPA and a portion of the lowlands. Ground surface elevations at Parcel A range from 0 to 18 feet above mean sea level (msl) in the lowlands to 180 feet above msl at the ridge crest.

The peninsula forming HPA is within a northwest trending belt of Franciscan bedrock. Bedrock is present at the ground surface over most of Parcel A. In localized areas, the bedrock is overlain by fill material.

No wetlands or surface waters are located at Parcel A. Limited quantities of groundwater are present in localized fractures of the bedrock. However, Parcel A groundwater is not suitable as a potential source of drinking water because of low well yield. Groundwater from the bedrock aquifer discharges through springs and seeps along Parcel A slopes.

No underground storage tanks (USTs) ~~or subsurface structures, except for sewer lines, storm drains, and steam lines, are located at Parcel A.~~ Likewise, no aboveground tanks, drums, or hazardous materials storage areas are located at Parcel A. ~~≠~~ Sewer lines, storm drains, and steam lines are located at Parcel A. ~~These subsurface structures were included in the early environmental investigations of the Parcel.~~

2.2 ~~SITE HISTORY AND ENFORCEMENT ACTIVITIES~~

2.2.1 Background

↑ have there been any enf. activities?

Hunters Point was first developed for dry dock use in 1867. The Navy acquired title to the land in 1940 and began developing the area for various shipyard activities. In 1942, the Navy began using HPA for shipbuilding, repair, and maintenance. From 1945 to 1974, the shipyard was primarily used as a repair facility by the Navy. The Navy discontinued activities at HPA in 1974. From 1976 to 1986, the Navy leased 98 percent of HPA, including all of Parcel A, to the Triple A Machine Shop (Triple A), a private ship repair company. In 1986, the Navy reoccupied the property. Currently, portions of Parcel A are subleased for use as artists' studios.

Throughout its history, both the Navy and Triple A used Parcel A primarily for residential purposes. In addition, the Navy used one building on Parcel A as a radiation laboratory. Most of the other structures were used as offices and warehouses. Currently, approximately 61 buildings are located on the property, 45 of which are former residences. In addition, the foundations of 43 other structures are located on Parcel A.

The Navy began environmental studies at HPA in 1984 under the U.S. Department of Defense's Installation Restoration Program. Between 1984 and 1991, the Navy performed a series of installation-wide investigations to identify potential ^{contamination} source areas (WESTEC 1984; EMCON 1987; ERM West 1988; YEI 1988a and 1988b). In addition, the Navy conducted investigations in discrete areas of Parcel A (HLA 1987 and 1988; ATT 1987). ^{Insert 1 from page 7 here} Based on these investigations, seven areas at Parcel A, referred to as site inspection (SI) sites, were identified as potential source areas. Site-specific histories of each of these areas are provided below. ^{Insert 2 from p. 7, as an intro}

2.2.2 Site Inspection Activities at Parcel A

Parking medians in front of Building 901: The landscaped medians in front of Building 901, the Officers' Club, were identified as a potential source because the medians were filled in part with sandblast waste and oily materials. The medians are referred to as site SI-19.

Buildings 816 and 818: Building 816 is the former Naval Radiological Defense Laboratory (NRDL) High Voltage Accelerator Laboratory and Building 818 is the former Chlorinating Plant. The NRDL operated until 1976. Building 818 was used for chlorinating water. Because of the presence of a former drum storage area behind Building 816, the area was identified as a potential source area. These buildings and the surrounding areas are designated as site SI-41.

and fact 816 was an NRDL facility?

Former Building 906: Building 906, the Gardening Tool House, may have been used to store pesticides. For this reason, the building was identified as a potential source area and is designated as site SI-43.

Portions of the steam line system within Parcel A: The steam line system, constructed in 1950, spans the entire installation. The system was used to supply steam to heat facility buildings and docked ships and to facilitate the flow of oil through oil lines. Steam for Parcel A was generated at boiler plants located on other parcels. The Navy identified the lines as a potential source based on the remote possibility that waste oil was transported through the Parcel A steam lines. The HPA-wide steam line system is designated as site SI-45.

Portions of the storm drain and sanitary sewer systems within Parcel A: The storm drain and sanitary sewer systems for HPA were constructed in the 1940s and 1950s as a combined system. By 1976, the two systems had been separated. Currently, the storm drains at Parcel A flow into storm drains at other parcels, eventually discharging into San Francisco Bay. Flow from the sanitary sewer system is directed to Pump Station A, which pumps sewage off site for treatment and ultimate discharge through the City of San Francisco's publicly-owned treatment works. The HPA-wide system is referred to as site SI-50.

→ is this description of SI-51 accurate based upon our latest discussion of the transformer/PCB RI Report - please update.

Former locations of transformers containing polychlorinated biphenyls: In 1988, 199 transformers were removed from service at HPA, and during an inventory of the remaining transformers, another 118 transformers were identified. Based on available records, none of these transformers were used at Parcel A. To ensure that no additional transformer locations existed at Parcel A, further investigation was conducted as part of the SI. Buildings and areas throughout HPA where transformers containing polychlorinated biphenyls (PCB) were formerly located are referred to as site SI-51.

Then why does SI-51 apply to Parcel A.

Former underground storage tank S-812: A steel UST installed in 1976 was used to store fuel for a boiler located in Building 813. It is unknown when the UST was taken out of service. In August 1991, the UST and its associated piping were excavated and removed from the site. The former UST location is designated as site SI-77.

In 1989, EPA added HPA to the NPL. In 1990, the Navy, EPA Region IX, and the State of California entered into a Federal Facilities Agreement (FFA) to coordinate environmental activities at HPA. In 1991, the U.S. Department of Defense designated HPA for closure as an active military base under its BRAC program.

As the first phase in the CERCLA process, the Navy conducted a preliminary assessment/site inspection (PA/SI) of the seven potential source areas listed above and identified during the Navy's previous investigations. Upon completion of the SI in 1993 (PRC and HLA 1993), the Navy concluded that no further action was required at the SI sites. The EPA and Cal/EPA concur that no action is required at these sites.

2.2.3 Remedial Investigation Activities at Parcel A.

As a result of the SI investigation at site SI-50 (the storm drains and sanitary sewer systems), the Navy conducted an RI of the groundwater underlying Parcel A (referred to as the IR-59 site).

During the groundwater investigation, the Navy discovered sandblast grit waste containing paint chips in the backfill of a sanitary sewer line in a lot along Jerrold Avenue. Accordingly, the Navy included this area (referred to as the IR-59 JAI site) in the RI. The draft RI report was completed in June 1995. ~~The Navy also prepared a draft feasibility study (FS) report; however, based on the~~

and the Draft Final on September 22, 1995.

this will become clear in your responsiveness summary when you mention you received this comment and how it was handled.

Insert 1 Move to page 5

Insert 2 Move to page 5 as intro to 2.2.2

~~conclusion that Parcel A does not pose a risk to human health and the environment, the Navy, EPA, and Cal/EPA agreed that the FS report was not necessary, and the report was therefore not finalized.~~

The Navy has also conducted a series of facility-wide air quality investigations (ATT 1987; HLA 1992; Brown & Caldwell 1995). Human health risk assessments performed using data from these air quality investigations found that human health exposures at Parcel A are at acceptable levels.

2.3 HIGHLIGHTS OF COMMUNITY PARTICIPATION

move to site risks section.

In the late 1980s, the Navy formed a technical review committee (TRC) consisting of community members and representatives of regulatory agencies. The TRC met to discuss environmental issues pertaining to HPA. In 1993, pursuant to the Defense Environmental Restoration Program, 10 U.S.C. Section 2705(d), the Navy formed a Restoration Advisory Board (RAB), which replaced the TRC. The RAB is comprised of members of the community, the Navy, and the regulatory agencies. The RAB meets monthly to discuss environmental progress at HPA.

The draft RI ~~and FS~~ reports for Parcel A ^{was} released to the public in June 1995. The proposed plan for Parcel A was released to the public in August 1995. Both the ~~draft RI/FS~~ report and the proposed plan were made available to the public in the administrative record file and in information repositories located at the City of San Francisco Main Library and the Anna E. Waden Branch Library. A notice of availability of the Proposed Plan was published in *The San Francisco Sunday Examiner/Chronicle* on August 6, 1995, in *The Independent* on August 15, 1995, and in *The New Bayview* on August 20, 1995. A public comment period on the proposed plan was held from August 7, 1995, through September 5, 1995. A public meeting was held on August 22, 1995. At that meeting, representatives of the Navy presented the basis for the proposed no action alternative and were available to answer questions about the proposed plan. A response to the comments received at the public meeting and during the public comment period are included in the Responsiveness Summary which is Section 3.0 of this ROD. These community participation activities fulfill the requirements of Section 113(k)(2)(B)(i-v) and Section 117(a)(2) of CERCLA.

In addition to the PP was mailed to the people on the project for a mailing list today and reviewed comment.

2.4 SCOPE AND ROLE OF THE NO ACTION ALTERNATIVE

HPA is a large federal facility containing numerous potential source areas. To facilitate the investigation, remediation, and property transfer process under BRAC, sites on HPA have been grouped into geographical parcels.

In addition to Parcel A, five other parcels have been designated and are undergoing assessment activities. Under the current FFA schedule, the ^{Final approval} ROD dates for the other parcels are as follows:

<u>Parcel Designation</u>	^{Final} ROD Schedule <u>Approval Date</u>
Parcel B	February 1997
Parcel C	December 1997
Parcel D	July 1997
Parcel E	May 1998

The Navy also intends to perform an ecological risk assessment for the recently designated Parcel F, which encompasses the submerged portions of HPA.

The Navy's site management strategy is to accelerate actions at sites while identifying and closing out assessment activities at sites not requiring action. This strategy allows resources to be concentrated on those areas requiring action and meets the President's goal of quickly identifying parcels of property that can be transferred to the community or other agencies under the BRAC program.

This ROD selects the remedy for the two RI sites at Parcel A. The soil at IR-59 JAI does not pose a significant risk to human health or the environment; therefore, no action is necessary for the site. Similarly, no action is necessary for IR-59, which encompasses the groundwater underlying Parcel A, for two reasons. First, SOCs and metals were detected ~~only~~ ^{that did not exceed} at levels ~~below~~ EPA Region IX PRGs. PRGs are health-based chemical concentrations, developed for a single environmental medium and a specific land-use scenario, that are used for screening purposes in site investigations. Second, the only other substance detected in groundwater was total petroleum hydrocarbons (TPH) as motor oil.

Also, as w/TPH, no exposure pathway for GW so anything in it would not impact human health.

by the USEPA in San Francisco to screen ^{potential} human health risks at sites during the environmental investigations. Since levels of haz. sub. did not exceed PRGs, it does no unacceptable risk.

wording needs improving. Point is, there is no exposure pathway because no one will be drinking this water - it's not a drinking H₂O source. No risk assess. (done for TPH.)

The presence of this TPH does not pose a risk to human health because groundwater is not a drinking water source and because the detected levels of TPH as motor oil are low (600 micrograms per liter or less). Moreover, TPH is not a hazardous substance as defined under CERCLA and, therefore, the Navy has no authority to take a response action under CERCLA for the TPH. Although the State of California has authority to regulate the remediation of TPH in groundwater, the State concurs that the TPH levels in groundwater do not require further investigation, remediation, or groundwater monitoring (RWQCB 1995b). In summary, based on current information, no action is required at any site on Parcel A.

→ this statement can be confusing. If EPA lead, we can not spend of fund \$ to address non-CERCLA contaminants but Navy can spend its \$ to meet state requirements as appropriate.

2.5 SITE CHARACTERISTICS

2.5.1 IR-59

The Parcel A groundwater investigation was initiated as part of the SI for the Parcel A storm drain and sanitary sewer systems (SI-50). During the groundwater assessment of these systems, groundwater collected from a boring was analyzed and found to contain SOCs, TPH as motor oil, and metals. As a result, the preliminary investigation conducted during the SI was expanded to an RI, and the groundwater under Parcel A was designated as site IR-59. Although TPH is not defined as a hazardous substance under CERCLA, TPH analysis was included in the RI analytical program.

Three aquifers underlie HPA: the A-aquifer, the B-aquifer, and the bedrock aquifer. The only aquifer present at Parcel A is the bedrock aquifer, which is the upper weathered and deeper fractured portions of the Franciscan bedrock. Groundwater in bedrock at Parcel A is present in localized fractures that are sporadic and discontinuous.

Parcel A groundwater is not a potential source of drinking water under the California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) definition of drinking water because of the low yield of wells at Parcel A. Under the RWQCB's definition, groundwater is not a suitable or potentially suitable source of water for municipal or domestic water supply if it does not provide sufficient water to supply a single well capable of producing an average, sustained yield of

200 gallons per day (gpd). Based on aquifer tests, Parcel A groundwater wells are unable to produce 200 gpd. The RWQCB concurs that Parcel A groundwater is not a source of drinking water (RWQCB 1995a).

During the RI, the Navy collected groundwater grab samples from open boreholes and trenches as well as samples from six monitoring wells. Samples were analyzed for volatile organic compounds (VOC), SOCs, TPH, pesticides, PCBs, and metals. To evaluate whether further action was appropriate, analytical results were compared against EPA Region IX PRGs and federal and state maximum contaminant levels (MCL) for drinking water.

explain why/what of this comparison

No VOCs were detected in any groundwater samples. With the exception of a common laboratory contaminant, bis(2-ethylhexyl)phthalate, the only SOCs detected (naphthalene, 2-methylnaphthalene, and n-nitrosodiphenylamine) were present at concentrations below EPA Region IX PRGs. The highest concentrations of the SOCs detected and their respective PRGs are shown on Table 1.

Arsenic was detected in groundwater samples at levels above its PRG but below drinking water standards. Low concentrations of TPH as motor oil were detected in two small areas on Parcel A. A comprehensive discussion of the groundwater investigation and the nature and extent of the compounds detected in groundwater is presented in the RI report (PRC 1995b). No hazardous substances as defined under CERCLA were detected above health-based levels in any of the groundwater samples.

MCLs ?

why at end of discussion ?

2.5.2 IR-59 JAI

The IR-59 JAI RI was initiated upon the discovery of sandblast grit containing paint chips during the groundwater investigation at a lot along Jerrold Avenue. A sample of mixed sandblast grit and soil was analyzed and found to contain pesticides, low levels of SOCs, TPH as diesel fuel and as motor oil, and metals.

The Navy used field screening analysis and investigation by excavation to characterize the nature and extent of chemicals of concern in soil and to accelerate the overall investigation of IR-59 JAI. Under

Need to state this somewhere to justify no action.

Because invest. by excavation mitigated the risks at IR-59, no further action is required at this site.

and disposed of at an approved off-site facility,

this approach, 339 soil samples were collected from the ground surface to 5.5 feet below ground surface at IR-59 JAI. Soil and sandblast grit were excavated, and confirmation samples were collected and tested using an EPA-approved immunoassay-based test method. Soil excavation and confirmation sampling continued until field testing resulted in pesticide concentrations below the detection limit. In addition, samples were sent to a laboratory and analyzed primarily for SOCs, pesticides, PCBs, TPH as motor oil and diesel, and metals. Soil excavated during the investigation by excavation was replaced with clean soil. Tables 2, 3, and 4 summarize data on the compounds remaining in soil after the completion of the investigation by excavation. A comprehensive discussion on the soil investigation and the nature and extent of compounds detected in soil is presented in the Parcel A RI report (PRC 1995b).

2.6 SUMMARY OF SITE RISKS

2.6.1 Human Health Risk Assessment

Human exposure to groundwater at Parcel A is highly unlikely for the following reasons:

- Parcel A groundwater is present only in limited fractures or in poorly interconnected and sporadic fractures in the bedrock.
- In areas where groundwater was detected, individual wells are capable of yielding only insignificant and nonsustainable quantities of water.
- Historical records confirm that groundwater in Parcel A bedrock has never been used as a source of drinking water.
- The City of San Francisco's current groundwater policy excludes groundwater in Parcel A bedrock from future development based on the distribution of water in the bedrock and its characteristics.

Based on these considerations and the fact that no CERCLA-regulated substances were detected in groundwater, no human health risk assessment for exposure to groundwater was performed. EPA and Cal/EPA concur that a human health risk assessment for groundwater is unnecessary (EPA 1995b).

then we should not state in earlier sections that no risk - better to focus on no pathway/no exposure route. Careful how we use risk.

were not detected above PRGs (remember - they were detected, just not at levels of concern) (see p. 11)

Note: nasty stuff removed during RI work - only evaluating residual risks for soils!

stuff that remained at the site following excavation by investigation during the RI. Depths?

The Navy conducted a human health risk assessment based on exposure to soil at IR-59 JAI under both a commercial/industrial worker scenario and a residential scenario. To evaluate human health risks, EPA has established an acceptable range of risk levels that are presented as hypothetical excess lifetime cancer risks (CR) for carcinogens. Acceptable exposure levels are generally concentration levels that represent a hypothetical excess upper-bound lifetime cancer risk to an individual of between 10^{-4} and 10^{-6} . EPA has also established hazard indices (HI) to evaluate the risks associated with noncarcinogens. An HI of less than 1 is generally considered protective of human health. If the HI is greater than 1, an assessment of the chemicals is performed to determine whether the HI represents an unacceptable noncarcinogenic human health risk.

EPA Region IX PRGs were used as reference concentrations to evaluate potential risks from exposure to soils. The PRGs assume the reasonable maximum exposure (RME) to an individual that is expected to occur. Risk-based PRGs use RME parameter values to estimate concentrations in environmental media that correspond to a CR of 10^{-6} or an HI of 1.0. The Region IX PRGs are used to convert exposure point concentrations for each chemical detected at each site to a CR or HI as appropriate. To characterize the CR, the Regional IX PRG is used to convert the exposure point concentration for each chemical of concern into a CR number.

Commercial and industrial workers may be exposed to compounds detected at IR-59 JAI through direct soil exposure. Direct soil exposure includes ingestion and dermal contact with soil and inhalation of fugitive dusts. The potential risks associated with direct soil exposure were determined using EPA Region IX PRGs; for chromium, the PRG for total chromium was used. The total HI was calculated to be 0.1 under the commercial/industrial worker scenario. Because this value is less than 1, noncarcinogenic health effects are not expected under the commercial/industrial worker scenario. The estimated CR for all detected chemicals from soil exposure is 5×10^{-7} , which is below the lower end of EPA's acceptable risk range of 10^{-4} to 10^{-6} . Therefore, no significant carcinogenic risks are expected from exposure to IR-59 JAI soils under a commercial/industrial worker scenario.

residuals

Future residents may be exposed to chemicals through direct soil exposure and through ingestion of homegrown produce. The potential risks associated with direct soil exposure were determined using

the EPA Region IX PRGs; for chromium, the PRG for total chromium was used. The potential risks related to ingestion of homegrown produce were calculated using standard risk assessment methodology. To account for all potential risks, the residential HI was calculated for exposure of children to soil, and the residential CR was calculated for the first 30 years of life. Nickel, chromium, and manganese primarily drive the noncarcinogenic risk. Based on the fact that most of the chromium and nickel detected is present at concentrations similar to ambient levels (see Table 4) and using the toxicity value for manganese based on food ingestion, the HI is probably less than 1.0. The CR is primarily driven by chromium, benzo(a)pyrene, and heptachlor. The total estimated CR at IR-59 JAI under the residential use scenario is estimated to be 7×10^{-6} , which is within EPA's acceptable risk range. Accordingly, under a residential use scenario, no significant carcinogenic risks are expected from exposure to IR-59 JAI soils.

can we say anything more about the unlikelihood of complete exposure pathway for the concentrations driving risk (such as direct exposure to residual soils at depth unlikely, etc.)

The RI report presents a comprehensive analysis and discussion of the human health risk assessment (PRC 1995b). Based on these results, the Navy, EPA, and Cal/EPA agree that sites IR-59 and IR-59 JAI do not pose a significant threat to human health.

2.6.2 Qualitative Ecological Risk Assessment

Potential risks to ecological receptors from Parcel A were qualitatively evaluated by the Navy as part of the Basewide Phase 1A ecological risk assessment (PRC 1994) and by EPA in a screening level qualitative ecological risk assessment (QERA)(EPA 1994). Because most of Parcel A is developed and covered by manmade structures, such as housing and roads, the Basewide Phase 1A ecological risk assessment does not identify any significant exposure routes for terrestrial species. Accordingly, the ecological risk assessment report concludes that the risk to ecological receptors is minimal.

Likewise, in the QERA, EPA concludes that the risks to terrestrial ecological receptors are minimal based on the limited availability of habitat, the scarcity of potential receptors, and the low level of compounds detected.

*Wording Again:
however per earlier statement in this ROD - no risk ass. done for GW!!! Again, no pathway.*

2.7 DESCRIPTION OF "NO ACTION" ALTERNATIVE (this section appears to be missing.)

2.7.4 EXPLANATION OF SIGNIFICANT CHANGES

The proposed plan for the Parcel A RI sites was released for public comment in August 1995. The proposed plan identifies no action as the preferred alternative for the sites. The Navy and EPA reviewed all written and oral public comments submitted during the public comment period. Upon review of these comments, it was determined that no significant changes to the remedy originally identified in the proposed plan were necessary.

3.0 RESPONSIVENESS SUMMARY

[to be added after completion of the public comment period]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

claire

JUN 4 1990

OSWER Directive No. 9230.0-06

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Superfund Responsiveness Summaries
(Superfund Management Review: Recommendation #43E)

FROM: Henry L. Longest II, Director
Office of Emergency and Remedial Response
[Signature]
Bruce M. Diamond, Director
Office of Waste Programs Enforcement
[Signature]

TO: Director, Waste Management Division
Regions I, IV, V, VII, VIII
Director, Emergency and Remedial Response Division
Region II
Director, Hazardous Waste Management Division
Regions III, VI, IX
Director, Hazardous Waste Division
Region X

PURPOSE:

To improve responsiveness summaries so that they are more responsive to local communities' concerns.

BACKGROUND:

The Administrator's Superfund Management Review (the "90-Day Study") raised important questions about the structure and use of responsiveness summaries in the selection of remedy process. As the "90-Day Study" concluded:

"Whether EPA can do what citizens ask or not, we should always provide them a clear explanation of the basis for our decision. A responsiveness summary should reflect a genuine attempt to come to grips with citizens' questions and concerns; it should not appear to be an advocacy brief piling up evidence for why EPA's original decision was the only possible one."

The responsiveness summary serves two vital functions: first, it provides the decision-maker with information about the views of the public, government agencies, the support agency and potentially

responsible parties (PRPs) regarding the proposed remedial action and other alternatives. Second, it documents how comments have been considered during the decision-making process and provides answers to all significant comments.

As the "90-Day Study" notes, the public needs "clear, candid" responses. They need simple, accessible information that may not be provided by summaries aimed at PRPs. Many citizens do not see the responsiveness summary as a valid vehicle through which their concerns can be addressed. This perception by citizens frustrates them and makes the Agency's job of meaningful response to citizens much more difficult.

POLICY:

The new format described below addresses these problems. It is intended to provide responsiveness summaries that can deal thoroughly with complicated legal and technical issues while maintaining true responsiveness to local communities. This will be accomplished by dividing the document into two parts. It will satisfy the needs not only of the public, but also of the PRPs.

- 1) Responsiveness summaries should be divided into two parts.
- 2) Part I will be a summary of commentors' major issues and concerns, and will expressly acknowledge and respond to those raised by the local community. "Local community" here means those individuals who have identified themselves as living in the immediate vicinity of a Superfund site and are threatened from a health or environmental standpoint. These may include local homeowners, businesses, the municipality, and, not infrequently, PRPs. Part I should be presented by subject, and should be written in a clear, concise, easy to understand manner.
- 3) Part II will be a comprehensive response to all significant comments. It will be comprised mostly of the specific legal and technical questions and, if necessary, will elaborate with technical detail on answers covered in Part I. This part shall be of such length and terminology as deemed necessary by the authors. Like Part I, it will be divided according to subjects.
- 4) Part I's importance is in the simplicity and accessibility of both its language and presentation. Because Parts I and II will inevitably deal with similar or overlapping issues, the responsiveness summary should state clearly that any points of conflict or ambiguity between the two parts shall be resolved in favor of the detailed technical and legal presentation in Part II.

5) Ordinarily, the Community Relations Coordinator and the Remedial Project Manager should be responsible for preparing the responsiveness summary, with Office of Regional Counsel acting in an advisory capacity.

6) Where possible, a response to a "yes or no" question should begin with a "yes" or "no," before launching into a detailed explanation. If the question cannot be answered with a "yes" or "no," then a statement to that effect should be made at the beginning of that answer.

This approach will often lengthen the overall responsiveness summary. However, the trade-off will be that local communities will receive a much more "responsive" document, where the public can easily retrieve and understand answers without compromising the other statutory goals of the responsiveness summary.

Additional information on preparing a responsiveness summary may be found in Community Relations in Superfund: A Handbook, Interim Version, OSWER Directive 9230.0-3B, and in Community Relations During Enforcement Activities and Development of the Administrative Record, OSWER Directive 9836.0-1A. If you have any questions about responsiveness summaries, or wish to make comments please contact Jeff Langholz of the Community Relations staff at FTS 382-2460.

NOTICE: The policies set out in this memorandum are intended solely for the guidance of Government personnel. They are not intended, nor can they be relied upon, to create any rights enforceable by any party in litigation with the United States. EPA officials may decide to follow the guidance provided in this memorandum, or to act at variance with the guidance, based upon an analysis of specific site circumstances. The Agency also reserves the right to change this guidance at any time without public notice.

cc: Community Relations Coordinators, Regions I - X
Regional Counsel, Regions I - X

Superfund



Guidance on Preparing Superfund Decision Documents:

The Proposed Plan
The Record of Decision
Explanation of Significant
Differences
The Record of Decision
Amendment

Interim Final

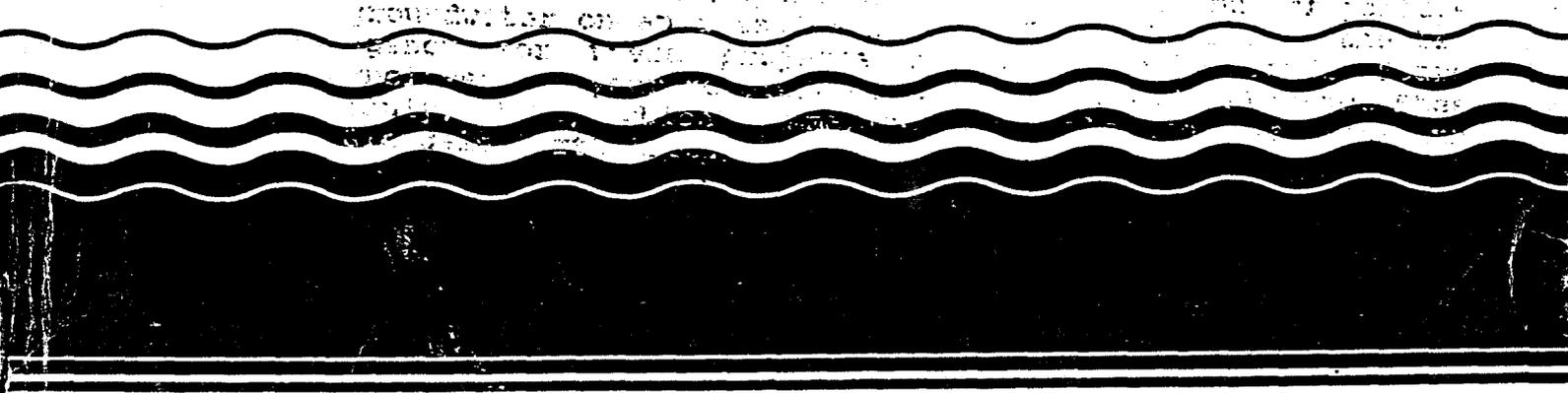


EXHIBIT 9-2**Documenting a No Action Decision:
Action Not Necessary for Protection****OUTLINE FOR THE ROD**

The preparation of a ROD to document a decision that no action is necessary to ensure protection of human health and the environment should follow the guidance presented in Chapter 6 with the special modifications noted below.

1. Declaration

- Site Name and Location
- Statement of Basis and Purpose
- ~~Assessment of the Site~~
- Description of the Selected Remedy: No Action
- ~~Statutory Determinations~~
- Declaration Statement - None of the Section 121 statutory determinations are necessary in this section. Instead, a brief statement should be made noting that no remedial action is necessary to ensure protection of human health and the environment. It should also be noted whether a five-year review is required. A five-year review will be necessary under a "no action" ROD when previous removal or remedial actions at the site result in the implementation of engineering or institutional controls to prevent unacceptable exposures from hazardous substances and when these controls will remain over the long-term.
- Signature and Support Agency Acceptance of the Remedy

2. Decision Summary

- Site Name, Location, and Description
- Site History and Enforcement Activities
- Highlights of Community Participation
- Scope and Role of Operable Unit or Response Action
- Site Characteristics
- Summary of Site Risks - The information presented in this section provides the primary basis for the "no action" decision. The discussion should support the determination that no remedial action is necessary to ensure protection of human health and the environment. This can be accomplished by demonstrating how the current and reasonable maximum exposure scenarios considered under the baseline risk assessment indicate that unacceptable exposures will not occur. Any exposure controls implemented as part of previous actions that contribute to protection of human health and the environment should be discussed.

EXHIBIT 9-2 (continued)**Documenting a No Action Decision:
Action Not Necessary for Protection****OUTLINE FOR THE ROD****2. Decision Summary (continued)**

- ~~Description of Alternatives~~
- ~~Summary of Comparative Analysis of Alternatives~~
- ~~Selected Remedy~~
- ~~Statutory Determinations~~
- Description of the "No Action" Alternative
- Explanation of Significant Changes

Note: The ROD should not include the "Description of Alternatives" or "Summary of the Comparative Analysis of Alternatives" sections. If alternatives were developed in the FS, the RI/FS report should be referenced.

3. Responsiveness Summary