



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

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July 27, 1995

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

RE: Draft Proposed Plan, Parcel A, Hunters Point Annex

Dear Mr. Radzevich:

EPA has reviewed the Proposed Plan for Parcel A, Hunters Point Annex. Our comments are presented directly on the enclosed pages of the draft document or below.

General

1) In general, EPA is concerned that the way the proposed plan worded, we are losing sight of the overall Parcel A picture. We would like the RI Report, Proposed Plan and ROD to focus more on Parcel A overall and why site conditions are protective of the environment.

2) Both the RI Report and the Proposed Plan need to provide a clearer picture of the overall Parcel A investigation and how we arrived at no action. The proposed plan in particular should include a more detailed history of Parcel A. The plan should tell a story, inform the public about what went on at Parcel A and how the Navy logically selected no action as the preferred alternative. As an example, the following sentence, found on page 5 is problematic: "this proposed plan does not address those seven sites, because of the previous determination that no remedial action was necessary at those sites." There was no clear explanation of these previous determinations. The plan should clearly explain what the SI phase yielded for these sites. The SI document could be referenced and results summarized. Then the Navy should further describe why other sites were carried through the RI and FS phases. This will help the public to better understand the overall environmental condition of Parcel A and why the no action alternative was chosen.

3) The phrase "soils left in place" is used often in the plan. Language must be added to clarify what this means. The public may not understand what is meant when this phrase is used. More detail on the investigation by investigation and what was done is very important to assist the public in understanding the overall picture.

4) It is not necessary that every page include a footnote explaining what the bold type means. One explanation in the introduction will be sufficient.

Introduction

1) The first sentence of the plan should probably read something like: "This fact sheet is the proposed plan for Parcel A at Hunter Point Annex (HPA). HPA is a deactivated Navy Shipyard in southeastern San Francisco, California adjacent to San Francisco Bay. The U.S. Department of the Navy..."

2) In the first or second paragraph of the introduction where we first mention the RI/FS report, please note that the draft RI/FS report which includes all of the background information, is also available for public review and comment at the information repositories.

3) The last sentence of the first paragraph is incorrect and should be re worded. In the case of Parcel A, a FS was not performed to evaluate the best alternative for addressing contamination because no CERCLA regulated substances were identified in the groundwater at levels of concern.

4) Based on comment 3 above, EPA continues to have trouble understanding why the Navy chose to conduct an FS under CERCLA to address non-CERCLA regulated contaminants (e.g. motor oil)? Is it because the Navy believes institutional controls such as monitoring, well abandonment and/or deed notices or restrictions need consideration?

Figures and Tables

1) Figures. EPA would like to see the Navy include a clear and easy to understand figure which shows all nine sites investigated for Parcel A, even the portions of the basewide utility sites. Please do not use Figure PS-1 or similar figures from the RI report as they contain a lot of information and are not very legible.

2) Table A. This table is misleading. The information presented is either unclear or incorrect. EPA standard levels has no meaning. What does the Navy mean to convey? In the RI Report it states that contaminants were compared to a number of criteria and that PRGs were just one of them. Please delete "EPA standard levels" and replace with language which clearly state what screening criteria were used and what the findings were. In addition, no samples were collected at SI-51, so the statement "No contamination was found" is not accurate. It would be more accurate to say that "there was no visible evidence (staining, etc.) of contamination." In the case of SI-50 and SI-77, samples were collected and VOCs or pesticides were detected. These are not naturally occurring compounds, so it is not correct to say that "no contamination was found." In these cases, wording like "there were no contaminants of concern" or "contamination was not detected at levels that required action" would be more acceptable. Finally, only human health risks are mentioned. Perhaps "No potential human health

risk" should be revised to state "no risk to human health or the environment. Should mention that conclusions reached about these sites occurred during the SI and that excavation of contaminated soil preceded the replacement with clean soil.

3) Table B. The sites should appear in the same order as they do in the text of the plan. It is not an accurate statement that no CERCLA regulated substances were found in the groundwater. Metals and SVOCs were detected. Perhaps this table should say that no CERCLA regulated substances were found at levels of concern. Also this table only addresses human health risk. The environment must also be addressed. Wording could be added that levels in the groundwater present no threat to eco-receptors.

4) Perhaps a table comparing alternatives would be beneficial to the public. This type of table is very common in EPA proposed plans. Or the Navy should provide more detailed language to the text comparing alternatives. Based on what is in the draft, there is no basis for comparison and it is unclear why alternative 1 is preferred. For example if there are costs associated with alternative 2, state what they are as the FS chapter of the RI report does.

Meeting Announcement

1) The time for the public meeting is listed as 5:00 pm to 7:00 pm. As I related to you earlier in a telephone conversation, I think that this start time is too early. For community members who work and have families, 5:00 pm is probably too early. I suggest that we move the meeting to 6:00 pm to 8:00 pm to better accommodate community members' schedules.

2) It was surprising to see Michael McClelland, the BEC, as the only contact for questions and comments. It is usually most appropriate to have the RPM be the contact. I know that Mr. McClelland has a secretary available to answer the phone but most specific questions will likely be referred to Bill Radzevich. For this reason, the Navy might consider listing Bill Radzevich as the contact or including him as a second contact in addition to Mr McClelland.

Background

1) In the background section, it is important to briefly explain everything that went on during the environmental investigations at Parcel A. This includes which sites included investigation by excavation, where the excavated soil was disposed of and that clean fill (name source?) was used to backfill the excavations. Also, it is important to explain more clearly what activities occurred at what sites during the SI phase versus the RI phase of work. In addition, please clarify the nature of the investigations at each site- were they soil, groundwater or both and why.

2) Under the background section the both RI and IR are mentioned but there is no clear description of how these two acronyms differ. IR is discussed under the Introduction but it the relationship

between the Navy's IR program and a CERCLA RI process should be explained in greater detail in the Background section of the plan.

3) Under the background section the 77 HPA sites are mentioned. This reference should probably be deleted as it can be confusing and the reader may think all 77 sites affect Parcel A in some way.

4) Page 4, paragraph 4. The description of the steam line system suggests that the lines in Parcel A were used to pump waste oil. It is more likely that the lines in other Parcels were used for waste oil as the lines in Parcel A are more distant from repair activities. This sentence should be rewritten to state that the lines in Parcel A were unlikely to have been used for transport of waste oil, but were inspected in order to eliminate the remote possibility for this former use.

5) Need to include clear references to the SI Report and other reports that provide additional background on the seven sites that reach no action at the SI stage. In addition, greater detail on why that conclusion was reached for those sites at the end of the SI should be expanded upon in the text of the plan.

6) First paragraph, last sentence on page 4. Please add "portions of" in front of the words "four parcel-wide sites."

7) Fifth paragraph, page 4. Need to explain investigation by investigation in detail, at what sites it was used and why.

8) Fifth paragraph, page 4, second to last sentence should be revised to read something like this: "Since contaminated soils were excavated, seven of the nine Parcel A sites investigated required no further investigation or remedial action."¹¹

Summary of Remedial Investigations

1) In alternative 2 - why is the Navy proposing to abandon its Parcel A wells? How does this further protect human health and the environment? Are these wells potential conduits of contamination? The Navy needs to provide the basis for this recommendation.

2) Please include a more detailed explanation as to why the Navy decided to perform a FS. It is particularly important to explain this given that motor oil, a non CERCLA regulated contaminant, was the only contaminant of concern detected at levels of concern in the groundwater. If the Navy can provide adequate rationale and feels strongly and FS is required maybe the terms "modified" or "limited" FS should be used both in the RI report and proposed plan.

3) May want to delete references to the field screening method because it not necessary. The public just needs to know that sampling was performed and what the results were. If the references to field screening are left in the plan be sure to include language describing the scope and results of any lab confirmation.

4) What about a statement about the protectiveness of the motor oil left in place. The public will certainly wonder about this since this contaminant drove the FS but no action is the preferred alternative. Perhaps the RWQCB can assist the Navy with some wording.

5) Under IR-59 JAI, need to explain better why this site was carried through RI. How is it different from the other seven soil sites which stopped at the SI stage. Please include an explanation in the plan.

6) Under IR-59 groundwater, need to explain more about the metals detected and why not concerned. Weren't SVOCs also detected?

Assessment Of Health Risks

1) Need to include a concise explanation of risk assessment. For example, "A risk assessment is a scientific procedure that uses facts and assumptions to estimate the potential adverse effects on human health and the environment."

2) The ecological risk assessment is not discussed in the plan. The document needs to include results of the ecological risk assessment to support that the preferred alternative is protective of the environment. Summary discussion similar to that presented in the RI report Section 6 should be included in the plan.

3) Risks from exposure to groundwater. The text of this paragraph is inconsistent. If this pathway was determined not to exist then why did was an FS performed. This does not make sense. As EPA stated in its letter to you of April 13, 1995, "Since no CERCLA-regulated substances were identified in the groundwater, a risk assessment [for groundwater] is unnecessary." This is the type of wording that should be used here.

4) Under Risks from Exposure to Surface Soil. Please delete this entire paragraph with the exception of the first sentence. Then, add the following sentence: "Excavating contaminated soil and replacing it with clean soil at these four sites eliminated possible exposure to contaminants."

5) The risk assessment summary appears to overestimate the risks at Parcel A. Dr. Stralka of my office informs me that he has spoken with PRC directly about this issue and EPA hopes the draft final plan will not include language that overestimates the risks.

Summary of Proposed Alternatives

1) It is awkward to have two alternative 1's. Throughout the report and the plan it is emphasized that the FS was conducted to address the groundwater and not the soil. Then at the end a no action alternative for the IR-59 JAI soils is mentioned. This is inconsistent.

2) Not enough information is presented to make a comparative analysis of alternatives. Cost information should be summarized as

should other criteria in order for the public to compare the two alternatives. As the plan is worded now, it is difficult to see why alternative 1 is preferable other than it does not cost anything. The Navy should be wary about how the public might view this section as it is worded in this draft. A table listing all nine criteria for each alternative could be one way of approaching it.

3) In addition to more detail on the comparative analysis of the alternatives, the Navy needs to be more clear on why Alternative 1 is preferred. Again, it could appear to the public that the primary reason is cost.

Information Repositories

1) In the first sentence, please add "Parcel A" in front of RI/FS Report.

2) Please include the days and hours of operation of the two libraries.

Glossary

1) Please delete the following from the glossary: Ambient Levels, Hazard Index, Human Health Risk Assessment, Jerrold Avenue Investigation and Potential Risk of Cancer.

2) Please add the following to the glossary: Site Investigation, Installation Restoration, Risk Assessment (can touch on both human health and ecological risks)

3) If possible, please use the EPA glossary of environmental terms to determine definitions. Please let me know if you need a copy of this document.

Additional Comments on Proposed Plan provided by EPA Counsel

A. General Comments

If this document is truly being written to support a decision that "no action" is necessary to achieve protection of human health or the environment, then the "limited action" alternative should not be discussed. As explained in EPA's guidance on documenting "no action" decisions in a Proposed Plan where no action is necessary to ensure protection, a description of the no action preferred alternative should substitute for the standard "Summary of Alternatives" or "Evaluation of Alternatives" section. If alternatives were developed in the FS, the RI/FS should be cited in the Proposed Plan, but the descriptions and analyses of these alternatives should not be included in the Proposed Plan (OSWER Directive 9355.3-02, p. 9-4, exhibit 9-1, paragraph 5). By including the "limited action" alternative in the Proposed Plan, the Navy is heavily undercutting their selection of the "no action" alternative.

Throughout the document there are references to the PA, the

SI, and the RI, as well as to "environmental investigations." It appears that the term "environmental investigations" may be meant to be a synonym for the PA work but it is unclear and will be confusing to the public. The document should specify which phase of work is being discussed to eliminate confusion.

The discussions of risk all lack a time component. For example, on page 9 the discussion of risk from exposure to surface soil defines the risk range for contact with soil by simply saying "contact with soil" without reference to a time frame. The time frame is a very important component of the risk calculation and should be added. Similarly, in the Glossary, the document uses an example regarding drinking water to explain "potential risk of cancer" and says only that the risk arises "if 1,000,000 people drank the contaminated water..." with no reference to a time frame. This definition is incomplete and will mislead and unnecessarily alarm the public.

At various points in the document, including Tables A and B, there are descriptions of SI and RI sites "requiring no remedial action" which include the statement that "contaminated soil was replaced with clean soil." This makes it sound as though action was both required and taken. The concept of remediation by excavation (or whatever the Navy called it) needs to be explained better.

B. Specific Comments

p.1, ¶ 2, Delete the entire 2nd sentence.

p. 2 - In the reference to submission of "verbal" and written comments, change verbal to oral. Verbal means with words, i.e. the opposite of verbal is pictorial. Something written can be considered verbal. What they really mean is spoken or oral. Also, pluralize the word "comment" on line 4 of the middle paragraph.

p. 3, ¶2 (Background) line 7, delete the words "Usually" and "chemical".

p. 3, final sentence - Wasn't parcelization also down to break down the cleanup to more manageable components?

p. 4, ¶4 - SI-51 sounds more like a parcel specific site than a parcel-wide site.

p. 4, ¶5, last line - change "required" to "would require".

p. 9, list of exposure pathways - Contact with surface soil should be elaborated on to explain inhalation, ingestion, dermal contact, etc.

p. 10, top line regarding eating fruit and vegetables - specify exactly how many years.

Glossary - Definition of ROD - add that the ROD selects the clean up alternative as well as explaining it.

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

Sincerely,

A handwritten signature in cursive script that reads "Claire Trombadore".

Claire Trombadore
Remedial Project Manager

cc: Gavin McCabe, EPA
Cyrus Shabahari, Cal/EPA

NAVY'S DRAFT PROPOSED PLAN FOR PARCEL A

INTRODUCTION

The U.S. Department of the Navy (Navy), in cooperation with the U. S. Environmental Protection Agency (EPA), the California Department of Toxic Substances Control (DTSC), and the California Regional Water Quality Control Board for the San Francisco Bay Region (Regional Board), is requesting public comment on this *proposed plan* for Parcel A at Hunters Point Annex (HPA), San Francisco, California (see Figure 1). ~~The proposed plan for Parcel A, based on the Remedial~~

Investigation (RI) and Feasibility Study (FS) report ~~calls for a no action alternative.~~ *prepared for Parcel A, the Navy is pursuing* The RI/FS

report was prepared as a result of three separate ~~phases of~~ investigations; a preliminary assessment (PA), a site inspection (SI), and an RI and a FS under the Navy's Installation Restoration (IR) program. The investigations were conducted by the Navy to characterize the nature and extent of the environmental contamination at Parcel A; the feasibility study was done to evaluate the best alternative for addressing the contamination.

Insert sentence about the public meeting here - then refer the reader to the last page for more details.

This proposed plan provides background information on Parcel A, discusses the contamination identified, summarizes the cleanup alternatives, provides information on public involvement opportunities, and describes the ~~preferred~~ *Navy's proposed no action* cleanup alternative. ~~This proposed plan does not replace the RI/FS report, but is intended to serve as a companion document to the report. This document fulfills the public participation requirements of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), Section 117(a), which states that the lead agency must~~

publish a proposed plan outlining the cleanup alternatives developed in the RI/FS report.

Members of the Bayview Hunters Point community ~~are encouraged to comment on all alternatives detailed in the RI/FS report, including the Navy's proposed cleanup alternative, during the comment period from August 7 through August 31, 1995. Based on the Navy's consideration of the~~ *and other interested parties* *no action* *public comment* *and the AR for Parcel A,*

~~community's comments, the Navy may change the preferred alternative or choose another alternative.~~

Following the comment period, the Navy will summarize and respond to ~~public~~ *public* comments in a document called a Responsiveness Summary and a Record of Decision (ROD) will be signed

documenting the final cleanup selection. *These documents will then be made available for public review at the information repositories listed on page - .*

Is this realistic?

* Words that appear in bold italics are defined in the glossary on page 13 of this plan.