

DEPARTMENT OF TOXIC SUBSTANCES CONTROLREGION 2
700 HEINZ AVE., SUITE 200
EMERYVILLE, CA 94710-2737

July 28 , 1995

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Engineering Field Activity, WEST
Naval facilities Engineering Command
Mr. William Radzevitch [Code 1832.2]
900 Commodore Drive
San Bruno, California 94066-5006

Dear Mr. Radzevich:

PARCEL A PROPOSED PLAN, HUNTERS POINT ANNEX, SAN FRANCISCO

The Department of Toxic Substances Control (Department) has reviewed the Parcel A Proposed Plan sent to us via facsimile on July 14, 1995 from PRC. We are still awaiting to receive the formal proposed plan from the Navy. The following and enclosed comments from the Regional Water Board are forwarded for your consideration.

The Department finds the above report to be confusing and incomplete. The proposed plan focuses mainly on the groundwater and ignores previous soil excavations and removals. The Department believes that these actions need to be articulated to present a total picture of events at areas of concern at Parcel A. Especially, when the proposed plan discusses identified sites, it is important to explain what happened at these sites.

It seems that the proposed plan focuses on "cost" as a driving factor in selecting an alternative. Further, the proposed plan does not consider the long-term effectiveness when evaluating the alternatives. The Department believes that alternatives must meet all criteria. The proposed plan should identify and provide a discussion of the reasons that supports the preferred alternative. It should also provide a summary explanation of any waiver identified or applied, if any.

1. Page 4, paragraph 5, sites identified in the SI scope of work encompassed site characterization, excavation and disposal of contaminated soils. It is therefore, incomplete to state that " data collected during the SI investigations" indicate no need to undertake remedial action. It is relevant and appropriate to explain the process and basis of removing contaminated soils.

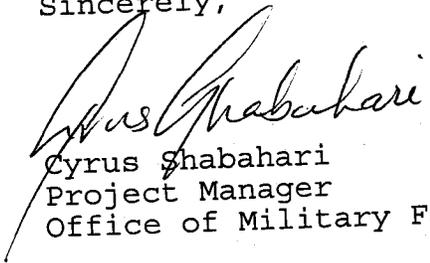


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2. Page 7, paragraph 2, it is important to indicate that contaminated soils were excavated and disposed of off site.
3. Page 8, please clarify the purpose of this table. Although motor oil is not a CERCLA substance, it is a substance regulated by the State.
4. Page 10, paragraph 1, the paragraph does not provide information on "Risks from exposure to groundwater". This paragraph needs to provide information consistent with the title. Further, it is not sufficient to only state that the groundwater is or is not a drinking water source. The Navy needs to initially explain the concerns before providing a rationale for not investigating further. It is important to note that drinking water is not the only exposure route. Please explain how the selected alternative is protective of human health and the environment through all exposure routes.
5. Page 10, paragraph 2, it is not clear why there is no explicit reference to any threat to the environment. It is believed that some environmental degradation has occurred. It is thus, important to provide a rationale that chemical residuals left in place will not cause further degradation of the environment. Please explain.
6. Page 11, the Navy's preferred alternative does not address an important criterion of "long-term effectiveness". The Navy needs to address that important criterion.

Should you have any questions regarding this letter and would like to seek clarification, please call me at (510) 540-3821.

Sincerely,


Cyrus Shabahari
Project Manager
Office of Military Facilities

Enclosure

cc: Please See Next Page

Mr. Radzevich
July 28, 1995
Page Three

US EPA
Region IX
Attn: Claire Trombadore
Mail Code H-9-2
75 Hawthorne Street
San Francisco, California 94105

Regional Water Quality Control Board
Attn: Richard Hiett
2101 Webster Street, Suite 500
Oakland, California 94612



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

2101 WEBSTER STREET, SUITE 500

OAKLAND 94612

PHONE: (510) 286-1255

FAX: (510) 286-3986

VIA FACSIMILE

510.540.3819

Mr. Cyrus Shabahari

DTSC, Office of Military Facilities

700 Heinz Avenue

Berkeley, CA 94710

July 27, 1995

File: 2169.6032(RCH)

RE: DRAFT PROPOSED PLAN - HUNTER'S POINT ANNEX (HPA)

Dear Mr. Shabahari:

Regional Board Staff have reviewed the aforementioned proposed plan and have the following comments:

As described in the *Summary of Proposed Alternatives*, it is unclear if monitoring wells will be abandoned (closed) in both alternatives or only in Alternative 2. Both alternatives should properly close all monitor wells that will not be in service. Further clarification is required. The costs associated with well closing are nominal in comparison to the overall project and should not be the reason for alternative selection. Therefore the difference in these "alternatives" appears to be the deed notification.

Board staff have previously discussed property transfer concerns and deed notification requirements, for the residual motor oil pollution in groundwater, with Navy staff and their consultants. Board staff concur that based on the level of effort expended in these investigations and the type of pollutants found, the concentrations of motor oil detected in groundwater within the Parcel A bedrock does not require further investigation, remediation or groundwater monitoring. However, as stated in the draft RI, the groundwater at Parcel A is not well characterized due to the inherent complexities within the bedrock formation. Because of these complexities Board staff have always maintained that deed notification should be included as part of any no action alternative for Parcel A. The purpose of a deed notice is to alert potential buyers and developers. It is not intended to thwart development or stigmatize the property. Disclosure of past and present environmental problems is part of most, if not all, real estate transactions. HPA is no exception.

Proposed Plan
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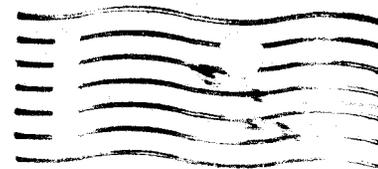
Board staff are available to work with City and Navy staff to draft acceptable language that meets all parties needs. For further discussion of this issue please contact the undersigned at (510) 286- 4359 or Ms. Shin Roei Lee at (510) 286-0699.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Hiatt", written in a cursive style.

Richard Hiatt
Groundwater and Waste Containment
Division

STATE OF CALIFORNIA
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
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