



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

IN CODE 102

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February 12, 1996

Mr. Dave Song  
Engineering Field Activity, West  
900 Commodore Drive, Code 1832.3  
San Bruno, CA 94066

RE: EPA Review and Comment on the Draft Formerly Used Defense Sites (FUDS) Field Sampling Plan (FSP), Hunters Point Annex, San Francisco, California

Dear Mr. Song:

EPA has completed its review of the above-referenced FSP for FUDS at Hunters Point. EPA's comments are presented below.

In general, the FSP does not clearly state the rationale for proposed soil and groundwater sampling and how the locations proposed will meet the overall objectives of the sampling effort which is to conduct "field work and data analysis required for investigating the three FUDS for possible chemical contamination." The rationale for the selection of boring locations should be presented. In addition, the FSP should discuss how the monitor well locations will be selected if contaminants are not detected in the Hydropunch samples.

In addition, has the Navy considered site access issues that may arise during the investigation of these three FUDS? While site access does not need to be addressed in the FSP, EPA recommends that the Navy begin addressing site access as soon as possible particularly given the problems that occurred with obtaining access to property adjacent to Parcel B.

**Specific Comments:**

1. **Section 1.2, p. 3, paragraph 1.** EPA did not receive a work plan for NRDL sites in December 1995. Please correct the date of the NRDL Work Plan submittal.
2. **Section 1.2, p. 3, paragraph 2.** Please reorder the sentences in this paragraph for clarity. The text as submitted jumps back and forth between sites, which is confusing for the reader. All text describing Building SI-74 should in one paragraph. Then discuss SI-75 and IR-76, in turn.

3. **Section 1.2, p. 3-4.** Please include a table summarizing the data gathered during the preliminary environmental investigation of IR-76. The text on page four only generally addresses the contaminants detected.
4. **Section 1.2, pp. 3-4.** The locations of boring 01UC01 and surface water sample UCSW should be shown on a figure. The concentrations of detected analytes should either be discussed in this section or summarized in a table. The inclusion of this information would make it easier for the reviewer to evaluate the results and rationale for the proposed locations. This information should also be available to the field sampling crew.
5. **Section 1.3, p. 4, Purpose.** Please restate in this section that the radiological issues will be addressed under CTO 285 and include an estimated start date.
6. **Section 4.1, p. 9 and Figure 3.** The investigation would be more comprehensive if at least one boring was installed on the northeast side of the building. Explain why no borings were proposed in this area.
7. **Section 4.3, p. 10 and Figure 5.** Please discuss the rationale for the selection of boring locations. Also discuss how the monitor well locations will be selected if contaminants are not detected in the Hydropunch samples.

Questions or comments regarding this letter should be referred to me at (415) 744-2409.

Sincerely,



Claire Trombadore  
Remedial Project Manager

cc: Cyrus Shabahari, DTSC  
Mike McClelland, EFAWEST