



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

N00217.003326
HUNTERS POINT
SSIC NO.5090.3

July 3, 1996

Richard Powell
Mail Code 09ER1
Engineering Field Activities West
900 Commodore Drive, Building B102
San Bruno, CA 94066-2402

RE: Draft Final Parcel B Remedial Investigation Report, Hunters Point Shipyard, San Francisco, California

Dear Mr. Powell:

EPA has reviewed the above referenced document submitted by PRC Environmental Management, Inc on June 4, 1996. In general, the draft document has incorporated the changes and revisions required by the agencies subsequent to review of the draft submittal. Because the major changes were comprehensively and adequately addressed, EPA approves the draft final remedial investigation for parcel B.

Bearing in mind the extensive nature of the revisions from draft to draft final, it is understandable that there remain a few items in the draft final document that need further clarification or follow-up. While it is not necessary to revise the document, and the items do not compromise the conclusions and recommendations contained in the document, EPA suggests that the concerns listed below be addressed via a letter of correspondence between the Navy and EPA which can be attached to the final document.

The concerns deal with conclusions and recommendations for further actions with regard to data gaps described in Section 5 of the text. Although it will not be necessary to resolve these data gaps for purposes of the final RI, it will be necessary to

take measures to deal with the gaps in the draft final FS and perhaps the remedial design phase for parcel B. The data gaps that need to be addressed in future documents are discussed below:

1. Establishing background levels for groundwater will require that the potential exposure pathways and associated risks posed by inorganics in groundwater be re-evaluated in the draft final FS.
2. Likewise, due to the rescoping of the IR-50 Storm Drain removal action, a follow-up infiltration study will need to be performed on the storm drains after sediment has been removed. The impact of migration of hazardous substances in groundwater to the Bay, either through storm drain conduits and the sand and gravel packs that may surround utility lines, or through migration within the A-aquifer, will have to be investigated and any necessary remedial action taken. It is important to realize that the Ecological Risk Assessment (ERA), repeatedly referred to in the RI, examines the effects of Hunters Point activities on sediment contamination, but does not address the impact of groundwater on aquatic receptors or the effects of mass loading of contaminants from groundwater on the Bay.
3. The extent of potential VOC and possibly DNAPL plumes at sites IR-6, IR-10, and IR-26 needs further characterization before or during the remedial design stage. There is a danger that any remediation performed on soils at these sites could be compromised by volatilization of potential contaminants in groundwater back into the soil.

Apart from the concern with data gaps, EPA would like to provide two general comments. The first comment pertains to the responses to comments found in Appendix P. In some instances a response has been given but has not been subsequently incorporated into the text or has been incorporated in a place other than that stated, or the comment has not been fully responded to. For future documents these inconsistencies can be easily resolved by stating in the response section where the changes have been made in the revised text. This step will enable the writers to verify that the changes have been incorporated into the revised document and will allow the reader to easily find the relevant changes.

The second general comment relates to the use of the OSHA permissible exposure limits (PELs) as the standard by which to evaluate indoor air pathways and associated risk. The OSHA standards are levels designed to assure worker safety in an industrial setting and they do not take into account potential additional exposures caused by environmental contamination. It

is more appropriate to compare indoor air pathway risk levels to residential air PRGs, and use the industrial exposure defaults, than to use PELs as a comparison.

Feel free to call me at (415) 744-2367 with any questions you may have regarding these concerns.

Sincerely,



Anna-Marie Cook
Remedial Project Manager

cc: Cyrus Shabahari, DTSC
Richard Hiett, RWQCB
Bill McAvoy, EFAWEST
Mike McClelland, EFAWEST
Jim Sickles, PRC