

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2

HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737

July 3, 1996



Engineering Facility Activities, West  
Attn: Mr. Richard Powell [1832]  
900 Commodore Drive  
San Bruno, California 94066-5006

Dear Mr. Powell:

**PARCEL B DRAFT FINAL REMEDIAL INVESTIGATION (RI) REPORT HUNTERS POINT**

The Department of Toxic Substances Control (Department) received the Draft Final Parcel B RI report and responses to comments on June, 3 1996. The Department recognizes the effort by the Navy in producing the RI report, knowing the complexities of issues. However, to impart our remaining concerns with the responses, we are forwarding the following and enclosed comments.

In our comment letter of March 18, 1996, the Department asked the Navy a series of questions pointing to the reasons behind drafting and submitting an incomplete and insufficient report. The Department also requested the Navy to expand discussions on nature and extent of contamination, provide additional descriptions on data gaps, and to clarify ambiguous conclusions. To assist the Navy, on April 16, 1996 the agencies met with the Navy and its contractors to discuss the issues.

To reflect the concerns raised by the EPA and the State for the Parcel B RI report, the Navy requested a 30-day extension to revise the entire report. Assurances were given that a 30-day extension was necessary to respond to all the concerns. To facilitate cooperation and hopefully generate a complete report, the agencies agreed to that extension. On June 3, 1996 the Department received the Draft Final RI report and responses to comments.

In our comment letter of March 18, 1996, the Department requested the Navy to identify and discuss data gaps. These data gaps have been known to the Navy for several years. For example, area adjacent to IR-18 was identified as a data gap in 1994. It is still unclear to us how the Navy failed to fulfill its obligation to fill data gaps in the allotted time. Chapter 5 of the Draft Final RI identifies some data gaps though no discussion is provided as to how and where they will be carried out.



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In addition, the Draft Final RI did not contain modifications as stated in the response to comments. For example, response to comment 3 of the Hydrogeological Sections states "Figures 3.7-6 through 3.7-10 have also been amended to incorporate first encountered groundwater". This information has not been added to the new pertinent figures 3.7-10 through 3.7-10.

The Draft Final Parcel B RI report also provides a window to the cleanup activities by another Navy unit outside of the FFA and CERCLA oversight. To the concerns raised by the Department on the cleanup activity by the Caretaker Site Office at Hunters Point, the Navy has not been able to find any documentation on the nature of the cleanup. The RI report indicates that some removal actions have taken place by that office. However, it is not known to what degree that office has been conducting independent cleanups. We ask the Navy to adhere to the FFA. Any CERCLA activities outside the FFA is considered a violation of that agreement subject to dispute resolution.

The report appears to have confused differences between removal and remedial actions. It is not clear if, for example, the exploratory excavation is considered a remedial action or a removal action. The Exploratory Excavation Engineering Evaluation/Cost Analysis was scoped for a removal action. Although, the Navy plans to remove limited amount of contaminated soils, it is premature to consider the removal as final.

The site characterization and plume maps in the RI report seem to have focused on contamination from surface to 10 feet below surface. However, there are areas with contamination deeper than 10 feet below surface that have not been addressed. There is a potential that such contamination might impact the groundwater. Present development of mitigation measures do not address those contaminants that will potentially migrate into the groundwater.

Despite our request, the Navy has not considered the impact of groundwater migration to the Bay. Instead, the Navy has deferred the potential impact of the groundwater to the Bay to the Ecological investigation. It is important to note that the Ecological investigation has only focused on the sediments in the Bay. It does not address any groundwater migration from different parcels into the Bay. The Navy needs to explain how such investigation will be addressed in the ecological investigation.

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The Draft Final RI contains references to removal actions which have not been planned by the BCT. It is not clear how these removal actions will fit into the overall cleanup at Parcel B. For example, fuel line and DNAPL removal actions have not been planned and it is not clear when they will be completed.

The bedrock aquifer seems to be characterized in order to understand the extent of contamination. We have found that groundwater samples in some bedrock aquifer wells were not analyzed for VOCs. We believe it is important to understand if contamination in the bedrock aquifer has extended onto Parcel A. We recommend the Navy to undertake the analysis as part of the monitoring program.

In conclusion, we have found the report to be inadequate in areas described above. Despite data gaps and inadequate explanations on the above issues, we believe it is still possible to proceed with developing a feasibility study. The Department accepts the Draft Final RI report with stipulation that all the above issues will be addressed in the upcoming CERCLA documentation. To accelerate that process, we ask the Navy to respond to the above and enclosed comments on the human health risk assessment by August 1, 1996. We also ask the Navy to proceed with field work to fulfill the data gaps as soon as possible.

Should you have any questions with respect to this letter, please call me at (510)540-3821.

Sincerely,



Cyrus Shabahari  
Project Manager  
Office of Military Facilities

Enclosures

cc: Please See Next Page

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## MEMORANDUM

**TO:** Cyrus Shabahari, Project Manager  
Site Mitigation Branch, Region 2  
700 Heinz, Second Floor, Building F  
Berkeley, CA 94704

**FROM:** James M. Polisini, Ph.D.  
Human and Ecological Risk Division (HERD) 

**DATE:** July 2, 1996

**SUBJECT:** PARCEL B DRAFT FINAL HUMAN HEALTH RISK ASSESSMENT  
[PCA 14740, SITE 200050-45 49]

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### Background

We have reviewed portions of the document titled *Parcel B Remedial Investigation Draft Final Report, Hunters Point Shipyard, San Francisco, California* dated June 3, 1996 and prepared by PRC Environmental Management, Inc. The volumes received for review included: Volume X, Appendix N, Human Health Risk Assessment; Volume XI, Appendix N, Attachment N-C, Concentration Terms; Volume XII, Appendix N, Attachment N-E through Attachment N-H; and, Volume XIII, Appendix N, Attachment N-H through Attachment N-J. These volumes were received in our offices on June 17, 1996. This review is in response to your written work request dated February 1, 1996.

A fourteen page facsimile copy of the response to agency comments on the Draft Parcel B Remedial Investigation was also furnished for review. The response to comments is dated June 3, 1996 with a transmittal memorandum dated May 30, 1996.

Hunters Point Annex (HPA) is situated on a promontory in the southeastern portion of San Francisco Bay. HPA is bounded on the north and east by San Francisco Bay and on the south and west by the Bayview Hunters Point district of San Francisco. The on-base property at HPA is approximately 497 acres on land of which 66 acres are contained in Parcel B. Parcel B is bounded on the north and east by San Francisco Bay, on the south-southwest by Parcel A, on the south-southeast by Parcel C, and on the west by a construction materials recycling facility.

### General Comments

A significant number of changes have been made in this draft final of the Parcel B RI which make the product much more cohesive. We appreciate the Navy response to comments made on the previous draft. There are, however, some minor changes which would improve the document.

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### Specific Comments

Please amend Table N.3-4 to clearly indicate which uptake factors are from Baes, et al. (Section 3.2.3.2.4, page N-3-18) and those which are calculated using equation 3-7 (Section 3.2.3.2.4, page N-3-21). Table N.3-4 contains a footnote referring to equation 3-7 for only some contaminants. I assume that all the other uptake factors are from Baes, et al., but a footnote indicating the source should be included for the uptake factors not currently footnoted.

We do not agree with the overly-broad statement that 'Mutagenesis is rarely seen in mammals' (Section 4.5, page N-4-7). Broadly defined, mutagenesis includes induction of DNA damage and all types of genetic alterations ranging from changes in one or a few DNA base pairs to gross changes in chromosome structure or chromosome number (Casarett and Doull's Toxicology). Please amend or remove this sentence.

We appreciate the effort which went into removing the concrete to obtain an air sample from building 134 for use in this risk assessment (Section 5.2.2, page N-5-9). The degree to which one sample can reflect site-specific conditions is always in question. Ambient concentrations of benzene in the San Francisco Bay region have been detected at concentrations higher than the building 134 concentration of 1.82 ug/m<sup>3</sup>. This seems odd when benzene is a site-related contaminant of the A aquifer. The original proposal from U.S. EPA Region IX was to compare indoor air to U.S. EPA indoor air Preliminary Remediation Goals (PRGs). Comparison of air concentrations with U.S. EPA Region IX PRGs, as long as exposures are summed, is the appropriate comparison for RI/FS decisions. Comparison of air concentrations with lower of the OSHA Permissible Exposure Levels (PELs), or the California PELs contained in Title 8 of the California Code of Regulations (CCR), would allow evaluation of a work place after any RI/FS cleanup.

The second sentence of the discussion of chromium in the toxicity assessment (Section 6.3, page N-6-3) should be amended. It currently contains the word 'not' which indicates that chromium VI was measured in samples which were not analyzed for chromium VI.

### **Responses to Comments - Appendix P**

The responses to General Comment number 1 and Appendix P Specific Comment number 4 indicate that information has been included to allow the San Francisco Regional Water Quality Control Board (SFRWQCB) to make a determination regarding the beneficial uses of Aquifer A in Parcel B. Has the SFRWQCB yet made a determination regarding Aquifer A?

The response to Specific Comment number 5 on Volume II of the draft RI report indicates that site-specific screening criteria (HGALs) will be included in the '...final remedial investigation report'. Do not include site-specific screening criteria in the final RI without submittal for review and discussion. We recommend that any site-specific screening criteria be submitted as a separate project note for review and discussion.

We agree that the Phase 1A ecological risk assessment is adequate for characterization of the terrestrial ecological threat (Response to Specific Comment 11). I was unable to locate the reference text in the new formulation of the risk assessment, but any reference to 'adverse ecological effects' should refer to 'adverse terrestrial ecological effects' to indicate that the aquatic assessment is not yet completed.

The point of Specific comment number 9 was that comparison of measured or modeled indoor air concentrations with EPA indoor air PRGs does not consider the added dose of some

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organic compounds from 'ambient' air or other routes of exposure. We will accept the comparison with U.S. EPA PRGs as long as the correct additive methodology is utilized.

**Conclusions**

The remaining critical issues are the apparent lack of a determination on beneficial use of the A aquifer by the San Francisco Regional Water Quality Control Board (SFRWQCB) and use of PELs in the industrial-use scenario evaluation of air. The A aquifer may need to be considered as a potential source of direct exposure if the SFRWQCB does not determine the A aquifer is unsuitable for domestic use. We believe the U.S. EPA indoor air PRGs, rather than the OSHA PELs, are the appropriate criteria for indoor air in all exposure scenarios, as long as the correct additive methodology is utilized.

Reviewed by: A. Kimiko Klein, Ph.D.  
Staff Toxicologist  
Human and Ecological Risk Division

cc: Michael J. Wade, Ph.D., DABT, Senior Toxicologist, DSMOA Coordinator, HERD

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