

## Arc Ecology

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August 12, 1996

Mr. Richard Powell, Code 1832  
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Post-it* Fax Note	7671	Date	Aug 12	# of pages	3
To	Richard Powell	From	Chris Shirley		
Co./Dept.		Co.			
Phone #		Phone #	495-1786		
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Dear Mr. Powell:

Arc Ecology has reviewed the Parcel D Remedial Investigation Draft Report, dated June 28, 1996. This letter summarizes our concerns with the document.

We expected the RI report to be more than a data-dump for the IR program. We hoped the report would develop a cogent picture of conditions at each IR site so that appropriate remedial alternatives may be developed. Because developing this picture is a subjective endeavor, not merely a rendering of scientific data, results of the analysis ought to be subject to public and regulatory review and scrutiny. This draft RI report offers little more than raw data. As a result, we find the draft report not only difficult to review, but pointless. The real work has yet to be done.

Members of the community, the RAB, and regulators ought to have an opportunity to craft and review the conclusions that will drive selection of a remedial alternative. We suggest that the report be revised so that each subsection within Section 4.0 begin with a one to three paragraph description of conditions at the subject IR site. Data used in support should follow. The description should address the extent of contamination, which contaminants and pathways drive any human health or ecological risks, potential for identified contaminants to migrate, degrade, or transform in the environment given site geology and hydrology, data gaps and uncertainties, and any restrictions imposed by proximity, past use, buildings, and other infrastructure.

The schematic cross section drawings begin to address this concern. However, they do not appear to be drawn to scale nor do they appear to be rigorously related to site data. For example, Figure 4.2-4 implies that highest concentrations of PCBs are associated with the dry well. We see no data in the report in support of this conclusion.

**Index:** please provide volume numbers for the figures.

**List of Acronyms:** DNAPL needs to be added to the list

### Section 4.0: Parcel D Remedial Investigation

Page 4-66, and all other parcel-specific recommendations: It may not be appropriate to evaluate TPH at the IR sites under a petroleum corrective action plan since many of the sites also are contaminated with PCBs, heavy metals, and SVOCs. Why was this recommendation made for every IR-site?

Figures 4.1-1 through 4.1-83: We do not find the 83, large-format, chemical-specific maps (requiring four three-inch binders and 83 plastic covers) to be useful or necessary. It seems that a less resource-intensive and better integrated approach to presenting this information may be possible, especially given

congressional and DoD concerns about the cost of these projects. Furthermore, the expense of duplicating these oddly-formatted and bulky reports limits their availability to the public for review and comment.

#### Section 4.2: IR-08

According to page 4-24, potential sources of contamination associated with former building 503 include floor drains and exterior storage yards, but sampling was not done in areas outside the PCB spill area. How was sampling strategy for IR-8 developed?

Page 4-26: Why was source characterization not conducted at IR-08?

The Navy used former Building 503 as a laundry. What is the possibility that dry-cleaning took place within Building 503?

Page 4-44 summarizes soil chemistry of IR-8. It appears that significant PCB contamination exists along the perimeter of IR-8, and for deeper soils in IR-8. This suggests that the extent of possible PCB contamination is still unknown. How will the Navy approach developing remediation strategy in the feasibility study if the full extent of contamination is not known? What steps will be taken to ensure that the site is fully characterized?

We would like more information about the investigation of the PCB spill area, accomplished between 1986 and 1987. Where were the 72 soil borings drilled? What did the 157 soil samples reveal? What is meant by the words "spill area?" Does this refer to the area contaminated as a result of the pipe rupture? What report lists this data? Please provide the sampling data in the RI report.

Page 4-49 states that the dry well may have provided a migration pathway for PCBs, yet page 4-52 and 4-53 state that the PCBs are expected to remain in their present locations and not degrade. Please reconcile these statements. The RI speculates that PCBs and other contaminants may be diffusing through the soil via the dry well associated with the stormwater system. What evidence do you have to support this conclusion? Where is the dry well located with respect to identified contamination? Figure 4.2-1 suggests that the dry well is located upgradient of the soil contamination.

#### Section 4.9: IR-33 South

We are concerned that potential radiation contamination prevented the Navy from thoroughly sampling the sumps and trenches outside Building 364. Does the Navy plan to sample this site after radiation contamination is removed?

#### **Section 5.0: Summaries and Recommendations**

Section 5.4.2: The potential data gaps section seems weak. We would like the data gaps section to address whether all sources of contamination within the IR site were explored, including soil testing for radiation.

#### **Appendix B: Calculation of Hunters Point Ambient Levels**

Was this document ever approved by the regulators and finalized?

#### **Appendix E: Radiological Investigations**

Is Building 506 considered part of Parcel E?

#### **Appendix N: Human Health Risk Assessment**

Petroleum contamination was not directly evaluated in the health risk assessment. Rather, BTEX is evaluated. What percentage of samples were analyzed for both BTEX and TPH? What percentage of samples were analyzed for TPH alone, without BTEX? What percentage of samples were analyzed for BTEX alone, without TPH? It seems that BTEX can be used as a stand-in for evaluating risk due to petroleum contamination only if BTEX were analyzed for each time petroleum products were detected. In the absence of BTEX (and SVOC) data, we prefer the Navy use a surrogate method of evaluating risk due

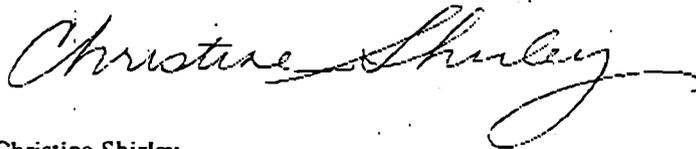
to TPH, as opposed to ignoring the TPH data altogether. In short, we disagree with the implied assertion that because TPH has not been assigned a toxicity value by EPA or DTSC it poses no risk to human health.

It appears that exposure under the worker scenario is evaluated for a 24 hour work day. Was 24 hours assumed for estimating worker dose, or should the description of assumptions used in the exposure dose equations be modified to account for exposures of shorter duration?

We are concerned that past and on-going radiation studies are poorly integrated into the RI report. Known radiation contamination at building 346, 315A, and surrounding grounds are not considered in the human health risk assessment. Why was residual radiation contamination not evaluated in the health risk assessment?

We value this opportunity to comment on the Parcel D RI and look forward to working with you to address our concerns.

Sincerely,



Christine Shirley  
Environmental Analyst

Cc:  
Community Members, Hunters Point RAB  
Hunters Point Citizen's Advisory Committee  
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