

**RESPONSE TO AGENCY COMMENTS ON THE
DRAFT ACTION MEMORANDUM
FOR HUNTERS POINT SHIPYARD
SITE IR-1/21: INDUSTRIAL LANDFILL
GROUNDWATER PLUME
SEPTEMBER 13, 1996**

This document responds to comments on the draft action memorandum (AM) for the IR-1/21: Industrial Landfill Groundwater Plume removal action at Hunters Point Shipyard (HPS), dated July 19, 1996. The comments addressed below were received from the U.S. Environmental Protection Agency, the California Department of Toxic Substances Control (DTSC), and the California Regional Water Quality Control Board (RWQCB) on August 29, 1996.

RESPONSE TO COMMENTS FROM EPA

The following comments were received by telephone by Mr. Michael McClelland of Engineering Field Activities West from Ms. Anna-Marie Cook of EPA on September 5, 1996.

1. **Comment:** Section 2.2, Paragraph 2, Line 2. The words "soil and floating product at" should be deleted from item (3) of the sentence regarding current removal activities at HPS.

Response: The appropriate change has been made in the AM.

2. **Comment:** Section 2.2, Paragraph 2, Line 4. The phrase "removal of hazardous materials" should be changed to read "removal of hazardous substances."

Response: The appropriate change has been made in the AM.

3. **Comment:** Section 2.2, Paragraph 2, Line 7. The phrase "removing and disposing of, or treating floating product and a limited volume of impacted soil after which remaining affected soil will be isolated" should be replaced with the phrase "isolating impacted groundwater."

Response: The appropriate change has been made in the AM.

4. **Comment:** Section 5.1, Paragraph 3. There is no description of characterization or approval from CCSF of the extracted groundwater prior to discharge to the sanitary sewer.

Response: The following sentences have been added to the referenced paragraph,

"After startup, there will be an initial shakedown period during which all groundwater will be stored and sampled prior to discharge. Once approved by the CCSF, groundwater will be discharged continuously with periodic monitoring."

5. **Comment:** Section 5.5, Action-Specific ARARs, Paragraph 2. The handling and management of any extracted groundwater should proceed on the

RESPONSE TO COMMENTS FROM RWQCB

1. **Comment:** For the location specific ARARs section for IR-21, the Navy should include the Porter Cologne Water Quality Control Act as a State ARAR to ensure that point and nonpoint sources of pollution discharging (seeping) to surface water are addressed. This is particularly important for California only listed and nonlisted wastes found at IR-21.

Response: The Porter Cologne Water Quality Act is not practicable to meet for the IR-1/21 removal action because it is outside the scope of the removal action. In accordance with Section 300.415(i) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), removal actions shall, to the extent practicable, attain ARARs. The practicability of attaining ARARs is evaluated considering the urgency and scope of the removal action. Because the objective of the IR-1/21 removal action is to contain contaminated groundwater, determining the extent to which the action complies with the nonpoint source discharge requirements of the Porter Cologne Water Quality Act is not practicable at this time. Compliance with the Porter Cologne Water Quality Act will be evaluated as part of the final remedial action for IR-1/21 and Parcel E.

2. **Comment:** The AM for the IR-50 storm sewer removal action should state where groundwater will be addressed (e.g. *An investigation of groundwater pollution infiltrating or exfiltrating this system has been deferred from this removal action and will be addressed in the RI/FS [remedial investigation and feasibility study]*).

Response: This comment does not apply to the IR-1/21 removal action