



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

AR_N00217_003397
HUNTERS POINT
SSIC NO. 5090.3.A

October 9, 1996

Richard Powell [1832]
Department of the Navy
Engineering Field Activity, West
900 Commodore Drive
San Bruno, CA 94066-5006

**RE: Draft Action Memorandum Soil Removal Action for Tank Farm
IR-6 Site, Hunters Point Annex**

Dear Mr. Powell:

EPA received the above referenced document, prepared by CH2M Hill, on September 25, 1996. We offer the following comments:

- The action memorandum should contain a table of contents and pages should be numbered.
- Under Section III.A (Threats to Public Health or Welfare), it is stated that the Parcel B risk assessment will confirm residual risk in the Tank Farm at the completion of this removal action and determine whether the action meets remediation goals for Parcel B. Since the Feasibility Study has overtaken this removal action, it would be appropriate to use the information in the FS to determine remediation goals prior to implementing the removal action.
- The text under Section III.B (Threats to the Environment) does not seem to address the heading of the section. Please incorporate a paragraph demonstrating that there exists an actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants. Under the endangerment determination, state which media presents a threat to which receptor(s).
- Section V.A.5 describing ARARs is incomplete. The EE/CA states that the substantive requirements of RCRA for management of hazardous wastes are ARARs and this should be reiterated under the appropriate section in the Action Memo. In addition, the U.S. Department of Transportation (DOT) requirements are applicable to the transportation of any

hazardous waste from Hunters Point Annex to a treatment,
storage or disposal facility.

○ If you have any questions, please call me at (415) 744-2367.

Sincerely,

Anna-Marie Cook

Anna-Marie Cook
Remedial Project Manager

cc: Cyrus Shabahari, DTSC
Rich Hiett, RWQCB
Mike McClelland, EFAWEST
Bill McAvoy, EFAWEST