



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

N00217.003444  
HUNTERS POINT  
SSIC NO. 5090.3

December 2, 1996

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

**RE: Draft Record of Decision for Parcel B at Hunters Point Shipyard, San Francisco**

Dear Mr. Powell:

The above referenced document was prepared by PRC Environmental Management, Inc and submitted to EPA on October 17, 1996. The enclosed comments address EPA concerns with the draft document. We are confident that these concerns can be resolved through discussions and working meetings before the issuance of the draft final ROD.

This letter will also serve to inform you that, with the submission of these comments, I will conclude my work as EPA Parcel B RPM on Hunters Point Shipyard. My concurrent commitments as RPM on two other assigned bases make it too difficult to continue my role on the Hunters Point team. Claire Trombadore will be taking over EPA oversight duties on Parcel B, and all related future correspondence should be directed to her.

I would like take this opportunity to express my deep appreciation for the patience and support extended to me by you and Mike McClelland while I gained familiarity with Hunters Point activities. I have enjoyed working on this project, and it has been especially a pleasure to work with you both. I commend the active roles you play in facilitating the progress of investigation and clean up work at Hunters Point.

Please call me at (415) 744-2367 if you have any questions on the attached comments or if I can be of any other assistance. I look forward to working with you in the future.

Sincerely,

A handwritten signature in cursive script that reads "Anna-Marie Cook".

Anna-Marie Cook  
Remedial Project Manager

cc: next page

cc list:

Claire Trombadore, EPA  
Sheryl Lauth, EPA  
Vicky Lang, EPA  
Cyrus Shabahari, DTSC  
Richard Hiatt, RWQCB  
Mike McClelland, EFAWEST  
Bill McAvoy, EFAWEST  
Jim Sickles, PRC

## General Comments on Parcel B Draft Record of Decision:

1. The ARARs discussion in the ROD is very sparse and needs to be expanded. Table 3-5 in the Parcel D FS may be a good starting point, since the ARARs given in this table are quite comprehensive and also pertain to the remedy selection for Parcel B.
2. The contingency for use of alternative S-2 needs to be more thoroughly laid out in the text, with a description of target dates and actions that would necessitate the use of this alternative. If the pilot studies performed on soil show that the soil cannot be treated to levels appropriate for landfill cap material, then S-2 will be used as a default remedy. A date for performing the relevant pilot studies should therefore be included in the text. In addition, should the use of EPA presumptive remedy for the IR-1/21 landfill not be feasible, alternative S-2 will be selected, and, again, the date by which this decision will be made should be included in the document.
3. The selected groundwater remedy included groundwater monitoring guard wells to get an early warning of potential contamination reaching the Bay. Language should be included describing what actions will be taken, particularly with respect to methods and dates by which the regulatory agencies will be notified, should contaminants be detected above trigger levels in the monitoring wells. The regulatory agencies must be involved in any decisions on whether or not to take subsequent remedial action.
4. At IR-7, soil source removal is proposed as a method to prevent further leaching of contaminants into groundwater. While this approach is likely to result in no further contamination of groundwater in IR-7, existing levels of nickel above water quality criteria in groundwater at IR-7 need to be monitored to ensure that this contaminant does not pose a threat to the Bay. Although monitoring wells in IR-7 have been included in the ROD, language should be added to address the potential problem of the ineffectiveness of the soil removal remedy on groundwater contamination, i.e. what actions/notifications would occur if contaminated groundwater from this site appears to be impacting the Bay.
5. The potential soil and groundwater off-site contamination near IR-18 and IR-7 should be mentioned. The problems to date in gaining off-site investigation/characterization data make it difficult to provide in the ROD any definitive resolution to remediating contamination in this area. The Navy may want to consider placing guard wells on the boundary of IR-18 and IR-7 and the off-site area to monitor any movement of contaminated groundwater onto Parcel B and briefly state a contingency plan as to what actions/notifications will occur should contamination be detected.
6. It may be helpful to describe the location of the thermal desorption unit(s). How many units will be on-site? Will they be located adjacent to the areas to be excavated or will the excavated soil need to be moved to the units?

7. More details, such as location and ARARs, need to accompany the discussion on Corrective Action Management Units (CAMUs) and Temporary Units (TUs). If, as discussed in the November 14, 1996 meeting between the Navy and the regulatory agencies, CAMUs and TUs are not longer being considered, the ROD should be revised to reflect these changes.
8. Throughout the document, the term "cleanup goals" is used to refer to standards that apply to risk based cleanup goals, treatment levels and disposal levels. It is difficult to understand the level implied simply through context, and EPA suggests for clarity that different terms be used to refer to each type of cleanup level.

**Specific Comments:**

1. **pg 2, last paragraph:** Include in the second bullet, the plan to grout the bedding material in which the storm drains are located.
2. **pg 3, first bullet:** Deed restrictions should prohibit the use of groundwater for purposes such as drinking, agricultural and industrial uses.
3. **pg 7, second paragraph:** The first sentence should be reworded to include the San Francisco Bay as a surface water body, since activities on Parcel B do impact this media.
4. **pg 8, last paragraph:** Update the removal action status for the IR-50 removal action to reflect that removal activities are currently underway.
5. **pg 12, second paragraph:** Recommend defining presumptive remedy since the term is not necessarily self-explanatory.
6. **pg 13, third paragraph:** The wording on this paragraph leads the reader to the conclusion that most of the sites are petroleum contaminated and thus will be remediated under a separate corrective action plan. EPA's understanding is that most of the sites consist of co-mingled substances and thus will be remediated under CERCLA. Please clarify.
7. **pg 14, second paragraph:** Suggest referencing off-site contamination contingencies here.
8. **pg 15, first paragraph:** This paragraph should be reworded to make it clear that the risk analysis took into account all COPCs, including VOCs, SVOCs, and inorganic compounds above established ambient levels, in soil and in groundwater. The current wording sounds like only inorganics above ambient levels in soil were considered in the risk analysis, period.

9. **pg 15, last paragraph:** The use of the term "groundwater" is very confusing throughout this document. For instance, this paragraph refers to only the groundwater in the bedrock water-bearing zone being assessed for future domestic purposes. There is no explanation of why the A-aquifer is not considered, and the first and last sentences of the paragraph seem to contradict each other. It appears that the confusion lies in distinguishing A-aquifer groundwater from bedrock groundwater. Perhaps two different terms could be used, such as "groundwater" for the A-aquifer and "potential drinking water source" for the bedrock?
10. **pg 17, fourth paragraph:** Recommend defining "lifetime" in number of years.
11. **pg 18, last paragraph:** PELs are OSHA standards and are not applicable to evaluation of risk posed by environmental contaminants. Risk should be compared to ambient air PRGs with the standard default values used for industrial exposure.
12. **pg 19, third paragraph:** same comment as above.
13. **pg 19, last paragraph:** Using  $1 \times 10^{-4}$  risk level as the cutoff here appears inconsistent with the decision to use  $1 \times 10^{-6}$  risk level for the clean up goal for Parcel B. All sites posing a risk greater than  $1 \times 10^{-6}$  should be included in this paragraph to be consistent with the cleanup goals.
14. **pg 19, fourth paragraph:** See comment # 11 above regarding the use of PELs.
15. **pg 19, last paragraph:** See comment # 13 above regarding the use of sites above the cleanup goal range.
16. **pg 28, first bullet:** After the words "ambient concentrations" add the words "of inorganics".
17. **pg 30, last paragraph:** Under the description of off-site disposal alternatives, please include as ARARs the Department of Transportation regulations for transporting hazardous waste.
18. **pg 33, fourth and fifth paragraphs:** Here, and elsewhere in the document, the term "cleanup goals" is used to refer to standards that apply to risk based cleanup goals, treatment levels and disposal levels. Please clarify which levels are being discussed in each situation and perhaps call the different levels by different names.
19. **pg 34, first paragraph:** To what levels, by which method and when would the other solid waste streams such as cyclone and baghouse residuals be treated?
20. **pg 36, first paragraph:** Please include deed restrictions on such uses as agricultural and industrial in addition to drinking of groundwater.

21. **pg 43, Table 5:** Actual or estimated dates need to be included in this table.
22. **pg 50, first paragraph:** Please include deed restrictions on such uses as agricultural and industrial in addition to drinking of groundwater.
23. **pg 52, last paragraph:** In the discussion of "Preference for Treatment as Principal Element" only contaminated soils are addressed. Please include the groundwater component of the remedy under this section as well.

**The following comments pertaining to ARARs are generated by EPA's attorney for Hunters Point:**

**Action Specific ARARs**

1. Corrective Action Management Unit: In designating a CAMU (pg 51), the Navy should clearly state where the CAMU will be located. The Navy should be aware that by designating a CAMU, the closure and monitoring requirements of 22 CCR sections 66264.552 and 66264 .553 will apply.
2. **Temporary Unit:** Requirements for this type of unit are set forth not only in 22 CCR section 66264.600, as stated in the ROD, but in the entire 22 CCR Division 4.5 Chapter 14, Article 16 (22 CCR sections 66264.601, 66264.602 and 66264.603) and 40 CFR Part 264, Subpart X. These requirements are applicable and should be listed in the ROD.
3. Air Emissions Relating to the Excavation, Handling, and Temporary Storage of Soils on Site: ARARs dealing with fugitive dust problems related to excavation, and requirements for excavating, stockpiling and controlling aeration of contaminated soils should be listed. Possible ARARs include various Bay Area Air Quality Management District (BAAQMD) rules, such as BAAQMD 6-305, 6-310, 6-301, and 6-302, as well as Regulation 11, Rules 1-300, 1-500 and 1-600, and Regulation 8, Rule 47. The Navy may want to consult Table 3-6 from the Parcel D FS for a thorough discussion of applicable ARARs related to air emissions.
4. Air Emissions from Thermal Desorption Units: The Navy should investigate and list the ARARs which relate to the air emissions from the thermal desorption unit. An example of a relevant and appropriate ARARs may be BAAQMD Regulation 2, Rule 2-301. In addition, 40 CFR Part 264, Subpart AA (or the State equivalent, if any) emission standards for process vents might be relevant and appropriate because the thermal desorption unit may have a process vent which is vented to the atmosphere.

Miscellaneous ARARs:

1. 22 CCR Division. 4.5, Chapter 11, Articles 2 and 3 (40 CFR part 261, Subparts B and C) which provides the criteria for determining whether a solid or liquid waste is a RCRA or non-RCRA hazardous waste. This ARAR is applicable to Parcel B in determining whether the excavated soils and groundwater removed in the excavations must be managed as a hazardous waste.
2. 22 CCR Division 4.5, Chapter 12, Articles 1-3 (40 CFR Part 262, Subparts A through C) which are applicable to excavated soils that are considered a hazardous waste and will be disposed off-site.

#### **Location Specific ARARs**

1. On page 51, the Coastal Zone Management Act and the California Coastal Act are cited and a general discussion of the Acts is provided. However, there should be an explanation as to whether these ARARs are applicable or relevant and appropriate and why they are considered. In Table 3-5 of the Parcel D FS, the Navy has identified 15 CFR Part 930 and 923.45 as applicable under the Coastal Zone Management Act, and various provisions of the Endangered Species Act have been identified as potential ARARs. Why would these provisions not also be applicable at Parcel B?
2. The National Historic Preservation Act, 16 U.S.C. Section 470 et seq. is identified as an ARAR on page 52, but a discussion on whether the ARAR is applicable or relevant and appropriate, why it applies and why the remedial actions will comply with this ARAR needs to be supplied. In Parcel D FS, 40 CFR Section 6.301(b) and Executive Order 11593 are identified as ARARs. Is it possible these would apply to Parcel B as well?

#### **To Be Considered:**

The following two TBCs may apply:

1. TSCA PCB Spill Cleanup Policy of 40 CFR 761.125
2. Soil Lead Cleanup Levels of EPA OSWER Directive 9355.4-12.