



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

N00217.003674  
HUNTERS POINT  
SSIC NO. 5090.3

April 14, 1997

Mr. Richard Powell  
Lead Remedial Project Manager  
Hunters Point Shipyard  
Engineering Field Activity, West  
900 Commodore Drive, Code 09ER1  
San Bruno, CA 94066-5006

Mr. Michael McClelland  
BRAC Environmental Coordinator  
Hunters Point Shipyard  
Engineering Field Activity, West  
900 Commodore Drive, Code 62.3  
San Bruno, CA 94066-5006

RE: IR Sites 25, 28 and 36, Hunters Point Annex

Dear Mr. Powell and Mr. McClelland:

At our April 7, 1997 BCT/RPM meeting, EPA discussed its concerns with the VOC DNAPL and vinyl chloride off-gas associated with three IR sites on Hunters Point Shipyard: IR-25 on Parcel B, IR-36 on Parcel D and IR-28 on Parcel C. We appreciate that the Navy has listened to our concerns and is willing to pursue remediation and monitoring to address them. Due to the FFA schedules for each parcel and the need to address these IR sites in accordance with CERCLA requirements, the Navy made a proposal for EPA's consideration. This letter responds to that proposal.

IR-28, Parcel C. The Navy proposed that IR-28 be addressed as currently planned in the Parcel C documents. EPA agrees with this proposal.

IR-36, Parcel D. The Navy proposed that the IR-36 be carved out of Parcel D and addressed in the FS (as necessary) and decision documents for Parcel E. EPA agrees with this proposal. In the Parcel D ROD, the Navy would state that while the data on IR-36 can be found in the RI/FS documents for Parcel D, the proposed and selected remedies for IR-25 will be presented in the decision documents for Parcel C.

IR-25, Parcel B. The Navy proposed that IR-25 be left in the Parcel B ROD and that we change the selected remedy to something like SVE with air sparging to address not only the DNAPL in soil and groundwater but the VC off-gas as well. EPA does not like this

proposal. For a number of reasons, EPA proposes carving out the decision for IR-25 and addressing it in the Proposed Plan and ROD for Parcel C. IR-25 could be addressed along with IR-28. EPA would suggest adding some discussion on IR-25 to the IR-28 write-up in the Parcel C Draft Final FS on possible remedies and a brief nine criteria analysis. In the Parcel B ROD, the Navy would state that while the data on IR-25 can be found in the RI/FS documents for Parcel B, the proposed and selected remedies for IR-25 will be presented in the decision documents for Parcel C. Not only would this resolve the issues on Parcel B but would eliminate duplication of effort and buy the Navy some more time to evaluate and select the appropriate remedies for both IR-25 and IR-28. As you know review schedule for the Parcel C FS has been extended for 30 days by EPA and therefore we have some additional time to incorporate this site into the draft final FS due June 30, 1997.

Please contact Sheryl Lauth at 744-2387 or me at 744-2409 with any questions or comments.

Sincerely,



Claire Trombadore  
Remedial Project Manager

cc: Vicky Lang, EPA  
Tom Huetteman, EPA  
Bill McAvoy, EFAWEST  
Bill Radzevich, EFAWEST  
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