



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

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San Francisco, Ca. 94105-3901

VIA FACSIMILE
(415) 244-2774

December 13, 1996

Mr. Larry Douchand
BRAC Environmental Coordinator
Engineering Field Activity West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94006-2402

Re: Draft Time-Critical Removal Action Memorandum, Shoreline
Areas (IR-04), Naval Fuel Depot Point Molate

Dear Mr. Douchand:

The U.S. Environmental Protection Agency (U.S. EPA) appreciates the opportunity to provide comments on a removal report entitled "Draft Time-Critical Removal Action Memorandum, Shoreline Area (IR-04), Naval Fuel Depot Point Molate, Richmond, California" (removal memo). The removal memo is prepared by PRC Environmental Management and is dated November 15, 1996.

During a portion of a December 5, 1996, Naval Fuel Depot Point Molate (Pt. Molate) BRAC Cleanup Team (BCT) project managers conference call, preliminary comments were provided by California Department of Toxic Substances Control (DTSC), California Regional Water Quality Control Board-San Francisco Bay Region (RWQCB), California Department of Fish and Game (CDFG) and U.S. EPA. As expressed during the conference call, U.S. EPA agrees with the State that the proposed containment trench may not contain all of the groundwater contamination in the Shoreline area and migration of contaminated groundwater may pose an environmental risk to the ecological habitat of San Francisco/San Pablo Bay. As expressed previously by U.S. EPA and the State, there is also major benefits to the Navy in completing the containment trench at this time, including cost savings and completion of a removal action that could bring closure to a significant source of contamination at Pt. Molate. For additional U.S. EPA comments, please see the Enclosure A.

During the above referenced BCT conference call, you announced that the Navy is conducting a "re-evaluation" of its decision to conduct removal actions at Shoreline Area (IR-04). As the Navy is aware, the environmental priorities and funding issues for Point Molate were the subject of multiple meetings

this year between the State (DTSC and RWQCB), U.S. EPA, and Navy. These meetings did result in the Navy's commitment to conduct necessary environmental actions to assess the impact of base operations and take necessary actions to ensure protection of human health and the environment (including containment of floating fuel products and contaminated groundwater at the Shoreline Area) and in doing so re-established a sense of trust, cooperation and coordination between the BCT. U.S. EPA is hopeful that the Navy will not seek to change or modify its current priorities or financial commitments with regards to environmental actions at Pt. Molate.

If you have any questions concerning this letter, please do not hesitate to contact me at (415) 744-2365.

Sincerely,



Phillip Ramsey

Remedial Project Manager

Enclosures

cc: Randy Adams, California Department of Toxic Substances
Control
James Nusrala, California Regional Water Quality Control
Board - San Francisco Bay Region

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Enclosure

U.S. EPA's Comments Regarding "Draft Time Critical Removal Action, Shoreline Areas (IR-04), Naval Fuel Depot Point Molate"

General Comments:

The U.S. EPA has reviewed the subject removal memo and has also reviewed comments provided by DTSC, RWQCB, and CDFG. U.S. EPA agrees with the state that the removal memo does not adequately address groundwater contamination in Drum Lot No. 1 and recommends that the containment wall be extended to include capture and control of groundwater contamination in the area of piezometer, PZ11-76. U.S. EPA also agree with the state regarding a need for performance monitoring wells, geologic cross-sections, and an expanded data evaluation.

In general, the Navy has made a good initial effort to document the distribution and magnitude of contamination at Drum Lot No. 1. However, the removal memo does not support a decision to terminate the containment trench at a location between PZ11-75 and PZ11-74. Based upon statements made by the Navy, U.S. EPA understands that the decision to terminate the trench at the proposed location was based primarily on funding limitations. U.S. EPA also understands that additional funding is possible from the Navy for priority projects, therefore, U.S. EPA encourage the Navy to seek necessary funds as soon as possible.

Specific Comments:

1. Section 2.1.5, NPL Status. Please revise text to indicate that Pt. Molate has been preliminarily scored as part of the Preliminary Assessment/Site Inspection (PA/SI) and is a low priority, active Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) site.
2. Section 2.1.4, Release or Threatened Release. No discussion is provided regarding past disposal practices at the shoreline area/treatment pond site. Since contamination detected at Drum Lot No. 1 may be a result of disposal activities at the pond site, these documented releases (i.e., batteries, miscellaneous sludges, contaminated fuels...) should be discussed in this section.
3. Section 2.1.4. It may not be necessary to collect samples to determine background concentrations of metals and polycyclic aromatic hydrocarbons (PAHs). The RWQCB has characterized background metals and PAHs for the North Bay. These numbers can be found in the attached Table 3.2-4 (see Enclosure B) of the Draft Long-Term Management Strategy for the Placement of Dredged Materials in the San Francisco Bay

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Region, Volume 1, April 1996, prepared by: U.S. EPA, Region 9; U.S. Army Corps of Engineers, San Francisco District; San Francisco Bay Conservation and Development Commission; RWQCB; and State Water Resources Control Board. The Navy should use the background data which already exists for the Bay.

4. Section 2.2.2, Current Actions. U.S. EPA notes that soil borelogs that are referenced as contained in Appendix B are not provided. U.S. EPA prefers to review these logs prior to receiving a final removal memo.
5. Section 2.2.2.2, and Table 2-1, Water Level and Product Thickness Measurements. U.S. EPA note that water levels and product thickness measurements are provided for all facility monitoring wells, however, only those wells within Drum Lot No.1 were illustrated. U.S. EPA recommend that groundwater elevation contours and product thickness illustration be included for all wells listed on Table 2-1.
6. Section 2.2.2.4, Groundwater Sampling and Figure 2-5, Drum Lot No.1 Groundwater Elevation Contours. Contrary to text, Figure 2-5 does not show locations of the thirteen (13) sampled wells or piezometers in Drum Lot No. 1; it shows the location of 20 existing wells/piezometers. Please clearly identify the thirteen wells sampled in Figures 2-3, 2-4, 2-5, 2-7, 2-8, and 2-9.
7. Figure 2-5, Drum Lot No.1 Groundwater Elevation Contours. For monitoring well MW11-54, the figure indicates 0.01-foot of diesel product was measured, however, Table 2-1 indicates "Bunker/Diesel".
8. Tables 2-4, 2-5, and 2-6. U.S. EPA requests that the three referenced data tables also include analyte-specific detection limits.
9. Appendix C, Well Development Forms. U.S. EPA notes that nine (9) of the piezometers (PZ11-70, PZ11-71, PZ11-72, PZ11-73, PZ11-75, PZ11-76, PZ11-77, PZ11-78 and PZ11-79) are described as having noticeable hydrocarbon (HC) or fuel odors. Noticeable HC and/or fuel odors are also recorded in Appendix E, Sampling Forms, for monitoring wells MW11-19, MW11-20, MW11-21, MW11-54, MW11-55, MW11-57. U.S. EPA note that no photo-ionization detector (PID) or flame ionization detector (FID) field screening values are included in Appendix C or E, however, PID/FID field screening is typically conducted as part of field sampling and health and safety monitoring.