



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

VIA FACSIMILE
(415) 244-2774

February 20, 1998

Mr. Larry Douchand, BRAC Environmental Coordinator
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, Ca 94066-2402

Re: U.S. EPA Review of Draft Phase II Remedial Investigation
Field Work Plan Naval Fuel Depot Point Molate

Dear Mr. Douchand:

The U.S. Environmental Protection Agency (U.S. EPA) appreciates the opportunity to review *Draft Phase II Remedial Investigation Field Work Plan Naval Fuel Depot Point Molate Richmond, California* (RI work plan). The RI work plan was prepared by Tetra Tech EM Inc. on behalf of the Department of the Navy and is dated January 19, 1998. The RI work plan was reviewed against *U.S. EPA Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA* (EPA/540/G-89/004, October 1988).

Based upon its review, U.S. EPA has determined that the RI work plan contains a number of significant deficiencies that require major revision/additional documentation and therefore, is unacceptable. Due to the extent of the deficiencies, U.S. EPA believes a draft RI work plan should be re-submitted. Further, due to the extent of the deficiencies, U.S. EPA comments are limited to general comments only. Please see the Enclosure A for U.S. EPA's general comments. Additional comments are also provided by Dr. Jeffrey Paull, U.S. EPA Technical Support Team Toxicologist, in Memorandum dated February 19, 1998 (please see Enclosure B).

In order to minimize any further delays in producing an acceptable RI work plan, U.S. EPA suggests that the RI work plan be the primary focus of the March 3, 1998, Project Managers meeting. U.S. EPA also requests that the Navy provide an estimated date for revising the Draft RI work plan.

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

Sincerely,

A handwritten signature in cursive script that reads "Phillip Ramsey". The signature is written in black ink and is positioned above the printed name.

Phillip Ramsey
Remedial Project Manager

Enclosures

cc: James Nursala, California Regional Water Quality Control
Board - San Francisco Bay Region
Patricia Jones, City of Richmond
Don Gosney, Community Chairperson, Point Molate RAB

ENCLOSURE:

February 20, 1998

U.S. EPA review of Draft Phase II Remedial Investigation Field Work Plan Naval Fuel Depot Point Molate, dated January 19, 1998

General Comment:

1. Consistent with U.S. EPA CERCLA RI/FS Guidance, the Point Molate RI work plan should include, at a minimum, the following elements:
 - 1.1 Introduction: The Introduction should present a general explanation of the purpose of the RI, the expected results or goals of the RI process, and the organization of the RI work plan. An expanded discussion is required of this section.
 - 1.2 Site Background and Setting: The purpose of this section is to establish the physical and historical setting of the site based on available information. A major revision is required of this section.
 - 1.3 Existing Data Analysis and Summary: The work plan should present the initial evaluation of existing data and background information performed during the scoping process, including the following:
 - a. An analysis and summary of previous responses
 - b. Presentation of the conceptual site model, including an analysis and summary of the nature and extent of contamination; preliminary assessment of human health and environmental impacts; and the additional data needed to conduct the baseline risk assessment
 - c. Preliminary identification of general response actions and alternatives and data needed for the evaluation of alternatives

A major revision is required. More specifically, U.S. EPA has determined the description of site data is incomplete and disorganized. Analysis and summary of existing data should be organized by Installation Restoration (IR) Sites [and not by Contracting Task Order (CTO)] and should be more accurately described within the text. Also, U.S. EPA notes that some of the data presented in the appendices may not be accompanied with site maps showing locations of sampling points. Use of maps and figures should be expanded (e.g., IR Site boundaries, soil contaminant distribution,

groundwater contaminant distribution, geologic profiles and cross-sections, and water elevation maps).

- 1.4 DQOs and the RI workplan approach: Data Quality Objectives (DQOs) should specify the quality of the data required to support decisions during remedial response activities. DQOs should be determined based on the end use of the data to be collected. The description of the RI work plan should present the major work elements to be performed. A major revision/additional documentation is required of these elements.
 - 1.5 RI Tasks: This element should clearly identify each task and state the specific work that will occur under each task, including its objectives and scope, information sources, and methods to be used. A sampling and Analysis Plan should also be prepared for the work. While not approved by U.S. EPA, Health and Safety Plans should be submitted for agency review and comment.
2. Rational National Standards Initiative, Section 2.4.11. U.S. EPA is unclear on tasks that will be completed during the RI based upon the January 1997 RNSI document. As indicated in U.S. EPA's March 28, 1997, review letter the RNSI ecological screening protocol is not suitable for use. Furthermore, a protocol for screening sites in the early stages of ecological risk assessment already exists in the guidance available from the State of California...This protocol has been accepted by the Region IX BTAG.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

MEMORANDUM

To: Phillip Ramsey
Remedial Project Manager
Federal Facilities Cleanup Office

From: Jeffrey M. Paull, DrPH, CIH
Regional Toxicologist
Superfund Technical Support Team

Date: February 19, 1998

Subject: Review of "Draft Phase II Remedial Investigation Workplan, Baseline Human Health Risk Assessment Methodology," for Naval Fuel Depot Point Molate, Richmond, California"

Scope of Review

We conducted an initial review of Chapter 4 of the Draft Phase II Remedial Investigation Workplan containing the Baseline Human Health Risk Assessment (HHRA) Methodology, for scientific and technical accuracy, and for conformance with USEPA Region 9 risk assessment guidelines, policies, and procedures. The document, dated January 19, 1998, was prepared by PRC Environmental Management, Inc., San Francisco, California, on behalf of the Department of the Navy, Engineering Field Activity West, Naval Facilities Engineering Command, San Bruno, California.

General Comments

Although the methodology employed in the Baseline HHRA for conducting a human health risk assessment appears to be generally sound, there are currently many significant data gaps unresolved health risk issues, including:

- The results of the screening level risk assessment for IR Site 2, which will determine whether this site will be included in the HHRA, have not yet been evaluated.
- The appropriateness of combining the analytical data from previous investigations with the Phase II RI data set has not yet been determined.

-
- An approach for establishing ambient background concentrations of contaminants detected at NFD Point Molate has not yet been developed.
 - An approach for evaluating the potential for human exposure to surface water and sediments in the HHRA has not yet been developed.
 - Specific information on whether edible fish species are present at the site, and in what quantity they may be present, is not currently available.
 - Contaminant fate and transport mechanisms have not been identified and fully characterized.
 - Exposure point concentrations for soil and air contaminants have not, as yet, been estimated.

Due to the many significant data gaps and unresolved human health risk assessment issues in the HHRA, and recognizing that USEPA project staff have identified major deficiencies in other sections of the Draft Workplan, which will require that a revised Draft Workplan be re-submitted, we are deferring a comprehensive review of the Draft HHRA at this time, with the expectation that the revised Draft Workplan will address many of these data gaps, and unresolved human health risk assessment issues.

cc: Dan Opalski, USEPA Region 9
John Christopher, CAL-EPA/DTSC

jmp/nfdpm3.mem