



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

VIA FACSIMILE
(415) 244-2774

May 22, 1997

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

Re: Draft Sandblast Grit Areas (Site 2) Removal Action Field
Work Plan and Draft Time-Critical Removal Action Memorandum
Sandblast Grit Areas (IR-02), Naval Fuel Depot Point Molate

Dear Mr. Douchand:

The U.S. Environmental Protection Agency (U.S. EPA) appreciates the opportunity to provide comments on documents entitled *Draft Sandblast Grit Areas (Site 2) Removal Action Field Work Plan* (work plan) and *Draft Time-Critical Removal Action Memorandum Sandblast Grit Areas (IR-02) Naval Fuel Depot Point Molate, Richmond, California* (removal memo). The work plan and removal memo are prepared by PRC Environmental Management, Inc. on behalf of the Department of the Navy and are dated April 21, 1997 and May 7, 1997, respectively.

U.S. EPA comments are provided below (please see Enclosure). U.S. EPA's Technical Support Section is unable to complete its review of removal memo Appendix B, Risk Screening within the review period provided; however, U.S. EPA staff will transmit Technical Support's memorandum following receipt and review.

If you have any questions concerning U.S. EPA comments, please do not hesitate to contact me at (415) 744-2365.

Sincerely,

A handwritten signature in black ink that reads "Phillip Ramsey".

Phillip Ramsey
Remedial Project Manager

Enclosure

cc: Mary Rose Cassa, California Department of Toxic Substances
Control
James Nuszala, California Regional Water Quality Control
Board - San Francisco Bay Region

ENCLOSURE

U.S. EPA Review of Draft Sandblast Grit Areas (Site 2) Removal Action Field Work Plan and Draft Time-Critical Removal Action Memorandum Sandblast Grit Areas (IR-02), Naval Fuel Depot Point Molate

Specific Comments on Draft Sandblast Grit Areas (Site 2) Removal Action Field Work Plan:

1. Section 1.0, Introduction. U.S. EPA requests that the Navy includes a statement regarding agencies involvement in work plan review and document development process.
2. Section 2.2, Site 2 Operations. U.S. EPA requests that the description of Area 2B be modified to state, "While no sandblast grit was observed at Area 2B during a January 28, 1996, site visit, large debris and brush piles were noted in the general area where grit was reportedly disposed."
3. Section 4.1, Soil Sample Locations. Please provide Navy rationale for selection of hexavalent chromium samples.
4. Section 4.2, Sample Collection Methods. Please modify the forth sentence in paragraph number one to read, "[a] stainless steel trowel will be used to collect grab samples from the 0.0 to 0.5-foot interval".
5. Section 4.3, Analytical Methods. U.S. EPA is unclear why the Navy referenced Methods for Evaluating the Attainment of Cleanup Standards (U.S. EPA, 1989) after its acknowledgment that EPA Methods 7196A and extraction Method 3060A will be used for analysis of hexavalent chromium. U.S. EPA requests that the Navy reference personal communications between U.S. EPA staff (Phillip Ramsey) and PRC (Brian Schuller on approximately March 12, 1997 and indicate U.S. EPA notified PRC that it has not withdrawn any analytical methods for chromium and SW846 EPA Methods 7196A and 3060A (alkaline carbonate digestion) are the approved methods for analyzing hexavalent chromium samples. Also, on Page 4-4, please delete the sentence, "[e]xtraction method 3060A (an alkaline digestion extraction procedure) will be used as it is believed to be more accurate that using deionized water for extraction.
6. Section 4.4, Indicator Metals. Text proposes to analyze soil samples for nine (9) indicator metals (Antimony, Cadmium, Chromium, Cobalt, Copper, Lead, Nickel, Thallium, and Zinc), in order to "streamline" the investigation. If laboratory costs are greater for the analyses of indicator metals than for the entire suite of Method 6010 metals, U.S. EPA recommend that the entire suite of metals be analyzed.

**Specific Comments on Draft Time-Critical Removal Action
Memorandum Sandblast Grit Areas (IR-02), Naval Fuel Depot Point
Molate:**

1. **Section 2.1.5, National Priorities List 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. **Appendix A, Administrative Record List Applicable to Site 2 Removal Action.** Please include minutes from March 24, 1997, BRAC Cleanup Team (BCT) and Remedial Project Managers (RPM) meeting and all correspondence transmitted by regulatory agencies for IR Site 02 removal action in Administrative Record List.
3. **Appendix B, Risk Screening, Table 6, PRG Screening Evaluation, Residential and Occupational Exposure Scenarios.** Please check calculated risk ratio for carcinogenic chemicals under residential and occupational exposure scenarios.