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HUNTERS POINT
SSIC NO. 5090.3

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

July 18, 2000

Mr. Richard Mach
Southwest Division Naval Facilities
Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5180

RE: Parcel B Excavation Delineation Report #1, Hunters Point Shipyard, dated July 10, 2000

Dear Mr. Mach:

EPA has completed its review of the above referenced document. Comments are included as an attachment. If you have any questions regarding these comments, please call me at (415) 744-2409.

Sincerely,

Claire Trombadore
Remedial Project Manager

cc: Mr. Chein Kao, DTSC
Mr. Brad Job, RWQCB
Mr. Jason Brodersen, TTEMI
Mr. Adam Klein, Tech Law Inc.
Mr. John Chester, City of SF
Ms. Amy Brownell, City of SF
Mr. Dave DeMars, Navy
Mr. Rich Pribyl, Navy
Mr. Tom Shoff, TTEMI

USEPA Review and Comment
Parcel B Excavation Delineation Report #1 dated 7/10/00

General Comments

1. The figures showing the existing/proposed excavations indicate that the Navy will not be excavating the portion of the sidewalls were the exceedances of the site cleanup goals were detected. This issue was discussed with the Navy at the July 13 BCT Meeting, and the Navy has agreed to modify the figures to indicate that the excavations will include the area where the sidewall exceedances were observed. However, it is not clear exactly how much of the sidewall will be excavated. Because the previous sidewall samples were composite samples, and therefore it cannot be determined where along the sidewall the sample exceedances occurred, the entire sidewall where exceedances were detected should be excavated.

2. Because the actual area proposed to be excavated will now include the sidewalls where exceedances were detected, the calculated bottom areas for the new excavations are incorrect. EPA's contractor, TechLaw, has attempted to calculate the new bottom areas for the proposed excavations, and where appropriate, we have recommended additional bottom samples be collected from these bottom areas.

3. It is not clear how some of the proposed excavation depths were determined. In particular, because the previous sidewall samples were composite samples collected from depths of 1-7 feet below ground surface (bgs) (shallow samples) or depths of 7-10 feet bgs (deep samples), it is not possible to determine at what depth the actual exceedance occurred at. This issue occurs at excavations B3422, B3822 and 60-2, and our recommendations for appropriate depths for these excavations are presented below in the summaries for these excavations.

4. If possible, please post the final confirmation sample data on the 11x17 map figures.

5. In the table the PAHs and Aroclor values may vary but all are reported ND. To be clear, please add footnotes to the confirmation sampling results tables noted the detection limit values used.

6. In general, EPA continues to have concerns with the use of single discrete samples for bottom confirmation in excavations that stop short of 10 feet. EPA would like to discuss issues of certainty associated with excavation depth and pre-excavation samples as bottom confirmation in greater detail. EPA needs assurances that the Navy has eliminated the possibility of leaving contaminants above levels of concern in the soil at Parcel B in excavations with depths less than 10 feet.

Specific Comments

IR-7, Excavation B0628.

Data Presentation Problems

- The excavation bottom surface area appears to have been calculated using the top of the excavation contours, instead of the bottom of the excavation contours.
- The proposed excavation area begins at the top of the excavation sidewall, and does not

include the sloped portion of the excavation sidewall where a sample exceedance occurred.

Recommended Revisions

- The Navy should collect one additional bottom sample, from the area of the proposed additional excavation. Including the excavation sidewall, the additional excavation will generate approximately 1,000 ft^2 of excavation bottom, at a depth of approximately 8 feet below the ground surface (bgs). A total of 2 bottom samples should be collected from this excavation for confirmation. The Navy has already collected 1 sample at a depth of 8 feet bgs, during the pre-excavation confirmation sampling, and therefore needs to collect 1 more bottom confirmation sample from the new excavation area.

IR-20, Excavation B4519.

Data Presentation Problems

- The excavation bottom surface area appears to have been calculated using the top of the excavation contours, instead of the bottom of the excavation contours.
- The proposed excavation area begins at the top of the excavation sidewall, and does not include the sloped portion of the excavation sidewall where a sample exceedance occurred.

Recommended Revisions

- The Navy should collect one additional bottom sample from the area of the proposed excavation. The new excavation will generate approximately 234 ft^2 of excavation bottom, at a depth of approximately 7 feet bgs. The Navy collected one biased "near-bottom" sample during the pre-excavation sampling, but this sample was collected from a depth of 6 feet bgs, and the excavation is proposed to extend to 7 feet bgs. The Navy collected one bottom sample from the previous excavation area, but once the additional excavation is completed, there will be approximately 900 ft^2 of excavation bottom, and therefore the Navy should collect one more bottom confirmation sample.

IR-24, Excavation 24-3.

Data Presentation Problems/Recommended Revisions - The figures indicate the excavation sidewalls are vertical, and therefore there do not appear to be any data presentation problems. Based upon the data presented, the appropriate number of samples have been collected, and the excavation area that is presented in the figure is also appropriate.

IR-24, Excavation 24-7.

Data Presentation Problems

- The excavation has vertical sidewalls, so there do not appear to be data presentation problems.

Recommended Revisions

- The Navy should collect one additional bottom sample from the area of the proposed excavation, and one additional sidewall sample from the south wall of the excavation. According to the sampling protocol presented in the Field Sampling Plan, there should be two discrete sidewall sampling locations and no biased "near-bottom" samples along the south sidewall, since the sidewall length is 28 feet and the excavation depth is 3 feet. However, the Navy collected one sidewall sample at a depth of 3 feet bgs, and one sidewall sample at a depth of 5.5 feet bgs. It is unclear why one of the pre-excavation confirmation

samples was collected at a depth of 5.5 feet (below the depth of both the original excavation and the proposed additional excavation). Additionally, the Navy has collected only one bottom sample from this excavation, even though the original excavation bottom area was 578 ft^2, and the additional excavation will generate another 141 ft^2, of bottom area.

IR-10, 24 Excavation B3422.

Data Presentation Problems

- The excavation bottom surface area appears to have been calculated using the top of the excavation contours, instead of the bottom of the excavation contours.
- The proposed excavation area begins at the top of the excavation sidewall, and does not include the sloped portion of the excavation sidewall where two sample exceedances occurred.

Recommended Revisions

- The Navy should collect two additional bottom samples, and revise the proposed excavation depth from 8.5 feet to 9.7 feet bgs. Additionally, although the sidewall where the pre-excavation confirmation samples were collected is approximately 44 feet in length, the Navy only collected sidewall samples at two locations along this sidewall. The initial excavation was to a maximum depth of 9.7 feet bgs. Two composite confirmation samples collected along the north sidewall of this excavation exceeded the ROD/ESD goals, with one of the composite samples collected from the shallow interval (1-7 feet bgs) and one of the composite samples collected from the deep interval (7-10 feet bgs.). The Navy's initial pre-excavation sampling collected samples from 2 locations, with samples collected at depths of 4 (sample 3422N1A1) and 7.5 feet bgs (sample 3422N1A2) at one location (along with duplicate sample 3422N1AX), and samples collected at depths of 3 (sample 3422N1B1) and 8.5 feet bgs (3422N1B2) at the other location. Because the initial excavation was to a depth of 9.7 feet bgs, and because the initial deep samples were composite samples from depths of 7-10 feet bgs, it is not clear why the Navy is proposing to only excavate to a depth of 8.5 feet bgs, instead of the original depth of 9.7 feet bgs. Additionally, based upon the square footage proposed for the additional excavation, the Navy should be collecting an additional 2 bottom confirmation samples

IR-24, Excavation B3822.

Data Presentation Problems

- In general, the large figure was difficult to interpret. The figure indicates the excavation has vertical sidewalls, however, the locations of the confirmation samples appear to be within the excavation, and not from the excavation sidewalls. Additionally, the figure shows two samples locations, 4600SSB and 4600SSA, where sample exceedances occur, but these data are not presented in the attached table. It appears that these data are from another excavation, possibly from the Fuel Line A Trench.

Recommended Revisions

- The depth of the excavation should be revised to be 9 feet bgs, instead of the currently proposed 8 feet bgs. Because the cleanup goal exceedance occurred in a composite sample collected from depths between 7 and 9 feet bgs, it is not possible to determine the exact depth of the exceedance. Because the original excavation extended to 9 feet bgs, the proposed new

excavation should also extend to this depth, to ensure that all of the potentially affected area is excavated. Additionally, the Navy should clarify the relationship between the locations of the samples shown in the figure and the excavation sidewalls, and the Navy should clarify the relationship between this excavation and samples 4600SSB and 4600SSA.

IR-24, Excavation B4018.

Data Presentation Problems

- The excavation bottom surface area appears to have been calculated using the top of the excavation contours, instead of the bottom of the excavation contours.
- The proposed excavation area begins at the top of the excavation sidewall, and does not include the sloped portion of the excavation sidewall where two sample exceedances occurred.

Recommended Revisions

- Collect one additional near-bottom biased sidewall sample from the west sidewall. Pre-excavation confirmation sampling was conducted along the east, south and western sidewalls of the original excavation. A sidewall sample and a near-bottom biased sidewall sample were collected from both the eastern and southern sidewall, but there was no near-bottom biased sidewall sample collected from the western sidewall.

IR-24, Excavation B4113.

Data Presentation Problems

- The excavation bottom surface area appears to have been calculated using the top of the excavation contours, instead of the bottom of the excavation contours.
- The proposed excavation area begins at the top of the excavation sidewall, and does not include the sloped portion of the excavation sidewall where sample exceedances occurred.

Recommended Revisions

- None

IR-60, Excavation 60-2:

Data Presentation Problems

- The excavation bottom surface area appears to have been calculated using the top of the excavation contours, instead of the bottom of the excavation contours.
- The proposed excavation area begins at the top of the excavation sidewall, and does not include the sloped portion of the excavation sidewall where sample exceedances occurred.

Recommended Revisions

- The excavation depth should be revised to be 7 feet bgs, instead of the 6 feet that is currently proposed. The original excavation was to a depth of 8 feet bgs. The sidewall samples collected from the original excavation were composited from depths of 1-7 feet bgs. Because the depth of the sidewall sample with an exceedance may have been collected from depths of 1-7 feet bgs, the additional excavation should be completed to the maximum depth of 7 feet bgs.