



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

JAN 12 1987

In Reply
Refer To: T-4-3

Mr. Alan Ramo
Legal Director
Citizens For A Better Environment
942 Market Street, Suite 505
San Francisco, CA 94102

Dear Mr. Ramo:

Thank you for the concerns expressed in your December 4, 1986 letter regarding hazardous waste evaluation activities at the Hunters Point Naval Shipyard (NSY). Regarding those aspects of the comments provided by Mr. Strauss of MHB Technical Associates related to Superfund matters, including the Initial Assessment Study (IAS) and the EMCOM Plan of Action, Mr. Strauss has accurately assessed their relationship to the Environmental Impact Statement (EIS) process. As he states, the IAS and current EMCON study are designed to identify and verify the existence of contamination by hazardous substances at all sites on Hunters Point NSY. Once completed, the Navy will initiate additional, including remediation, phases of its Navy Assessment and Control of Installation Pollutants (NACIP) program. Consistent with EPA's Superfund process, this will require full remedial investigations at all sites of concerns, feasibility studies with comprehensive alternatives analysis, and remedial actions, where appropriate. In accordance with the Superfund Amendments and Reauthorization Act of 1986 (SARA), all these activities must comply with all policy, guidelines, and procedures used by EPA in our own Superfund process.

The Navy's NACIP process is not meant to address all potential environmental concerns, such as those raised in the second paragraph of Mr. Struass' letter dated December 3, 1986, many of which must be addressed in the EIS process. As you know, that process incorporates several opportunities for public comment. EPA has submitted comments on the Navy's Final Supplemental EIS for the Reserve Frigate homeporting at Hunters Point NSY (Enclosure 1). If you have any questions related to the EIS process, please contact Mr. Rick Hoffman, Federal Activities Branch, at (415) 974-8191.

There are three issues raised by your letter dated December 4, 1986 which bear further discussion. Should the Navy decide to construct or otherwise impact areas currently involved in the NACIP process, including any site described in either the IAS or EMCON study, the Navy, in order to assure consistency with SARA, must first complete its remedial investigation, must fully evaluate remedial action alternatives, consistent with the Guidance

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on Feasibility Studies Conducted Under CERCLA, EPA, June 1985, then must implement the selected remedial action. As alluded to by Mr. Strauss, the timeline for execution of this process is typically extremely long (on the order of several years). In order to meet certain priorities, however, there is nothing preventing the Navy from accelerating this process, as long as consistency with SARA and the thoroughness and quality of the process are maintained.

Secondly, I agree that the current scope of the NACIP program may not include review of all sites contaminated by hazardous substances, as required by SARA. This potential deficiency could be due to poor record keeping and potentially unsound waste management practices by non-Navy tenants. This limitation is inherent in the Department of Defense Installation Restoration Program (IRP), and is commonly dealt with by inclusion of additional sites, at the time of discovery, in the current phase of IRP activities.

Finally, EPA feels that the Navy is making a good faith, albeit slow, effort at characterizing the hazardous waste sites currently known to exist at Hunters Point NSY. Given the past history of the NACIP efforts at the base, as evidenced in the limited verification phase budget and scope of work, the current remedial investigation efforts, which are necessary prerequisites to remedial action alternative evaluation efforts, may not be complete for several years to come.

If I can be of any further assistance regarding matters relating to the Superfund process, please do not hesitate to contact me at (415) 974-8603.

Sincerely,



Nicholas Morgan
Superfund Federal
Facilities Coordinator

Enclosure

cc: Mr. Alex Dong, WESTDIV
Mr. Roger James, RWQCB

ENCLOSURE 1

EPA COMMENTS ON
THE NAVY'S FINAL SUPPLEMENTAL
ENVIRONMENTAL IMPACT STATEMENT

RESPONSE TO COMMENTS
ON DECEMBER 1986 LETTER REGARDING
HAZARDOUS WASTE EVALUATION ACTIVITIES

THE ABOVE IDENTIFIED ENCLOSURE IS NOT
AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
NAVFAC SOUTHWEST TO LOCATE THIS
ENCLOSURE. THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED SHOULD
THE MISSING ITEM BE LOCATED.

FOR ADDITIONAL INFORMATION, PLEASE CONTACT:

**DIANE C. SILVA, RECORDS MANAGER
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