

STATE OF CALIFORNIA

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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Date: July 31, 1981
File No: 2169.6032 (WBH)

Attn: Mr. Greg Brown
Code 1142 A
NAVCOM
P.O. Box 727
San Bruno, CA 94066-0720

Subject: Hunters Point Naval Shipyard, San Francisco, CA

Dear Mr. Brown,

This letter transmits the Regional Water Quality Control Board (RWQCB) staff's major comments regarding the Confirmation Study Verification Step Report for the subject site. RWQCB staff offer the following comments:

1) Areas identified in the San Francisco District Attorney's investigation of Triple A Machine Shop should be included in the NACIP Studies (Installation Remediation Program).

2) The report inappropriately uses TTLC and STLC as regulatory cleanup action levels. These threshold concentrations are criteria used for hazardous waste classification.

3) The report states that for certain sites (Oil Reclamation Ponds, Industrial Landfill, Bayfill Area, and the Sub-Base Sandblast Fill, Painting and Additional Areas), groundwater concentrations of VOC's and SOC's are below acceptable regulatory threshold concentrations. This is incorrect. Cleanup levels acceptable to the Regional Board will be determined after completion of the RI/FS phase of the IR program. The Regional Board will consider the State Water Resource Control Board's Antidegradation Policy in making these determinations. It is the policy of the Regional Board that all pollutants be defined to background levels and that the feasibility of remediation alternatives, which would provide for cleanup to background levels, be examined.

4) The report indicates that pollutant concentrations tend to increase with depth at the Oil Reclamation Ponds. Contamination was encountered in the deepest samples taken from most bore holes (approximately 11.5 feet below grade). The vertical and lateral extent of this contamination must be fully defined.

5) The subsurface conditions explored at the Scrap Yard only ranged in depth from 3.5 to 6.0 feet. PCB's and lead were found in the soil. Lead exceeded the STLC and therefore has the potential to leach out of the soil. Inferring from data for nearby areas, groundwater beneath the Scrap Yard can be expected at 7 to 10 feet below grade. What was the rationale for not testing the groundwater at this site? Groundwater conditions at the Scrap Yard must be examined prior to, and/or during the Characterization Step of the NACIP (IR) Studies.

6) No soil borings extended beyond 2.0 feet in depth at the Old Transformer Storage Yard. PCB's were found in the soil, yet no groundwater samples were taken. Why were the borings terminated at such a shallow depth?

7) Was the soil or groundwater tested at the Pickling and Plate Yard? If not, why not?

8) The recommended additional geotechnical investigation for the Tank Farm should include examination of the groundwater.

9) As described in the Verification Report, "the Painting Area is underlain by heterogeneous artificial fill underlain by Bay Muds. Due to insufficient depth of exploration, Bay Muds were not encountered at the Painting Area". Future geotechnical investigations at the Painting Area should extend throughout the entire depth of the artificial fill layer down to the Bay Muds.

10) There were no wells installed in the Additional Areas adjacent to the Sub-Base Sand Blast Fill Area. The analytical results for two soil samples indicate diesel fuel in excess of 100 ppm. The RWQCB's Fuel Leak Guidance Document requires the installation of a monitoring well wherever fuel in excess of 100 ppm is encountered in the soil.

11) The Verification Report does not address the fifteen five gallon containers of xylene, metal conditioning agent and paint, identified in the Initial Assessment Study, which are located adjacent to Building 521. If there are signs of leakage or spillage on the concrete pad or surrounding soils, soil samples should be collected and analyzed to define the extent of the pollution.

12) The report's conclusion is not clear which (nine?) sites are specifically being recommended for the Characterization Step.

13) All comments contained in this letter should be responded to prior to completion of the workplan for the Characterization Step of the NACIP (IR) Studies.

14) Regional Water Quality Control Board (RWQCB) staff agree with the Verification Report's general conclusion that significant levels of pollution exist at Hunters Point and that

these levels pose a threat to the environment. RWQCB staff recommend that all sites, with the possible exception of the various asbestos contaminated areas which may require immediate remediation, be included in the Characterization Step of the NACIP (IR) Studies.

If you have any questions concerning this matter, please contact William Hurley at (415) 464-0841.

Sincerely,

A handwritten signature in cursive script that reads "Donald D. Dalke". The signature is written in dark ink and is positioned above the typed name and title.

Donald D. Dalke
Chief, Toxics Division

cc: Chein Kao, Department of Health Services
Amy Zimpfer, U.S. EPA, Region IX
David Wells, Environmental Health, City of San Francisco
Steve Castleman, S.F. Office of the District Attorney