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Ser 1146/HP/IR Program

5 OCT 1987

Mr. Donald Dalke
California Regional Water Quality
Control Board
San Francisco Bay Region
1111 Jackson Street, Room 6040
Oakland, CA 94607

Subj: EX-HUNTERS POINT NAVAL SHIPYARD INSTALLATION RESTORATION PROGRAM

This letter is in response to your letter of July 31, 1987 which provided comments on the Confirmation Study Verification Step Report for the subject program. We are preparing the detailed work plan and management documents for the Remedial Investigation and Feasibility Study (RI/FS) at Ex-Hunters Point Naval Shipyard (HPNS) and have included your comments in the development of these documents. The following provides our specific responses to each of the comments listed in your letter.

1. Preliminary investigations are in progress for some of the areas identified in the San Francisco District Attorney's investigation of Triple A Machine Shop (Triple A). Several of these Triple A sites are within the area to be covered by our Remedial Investigations (RI) and will be investigated during the RI. The Navy is currently performing preliminary investigations at the remaining Triple A sites. We will add those remaining sites requiring further investigation to the RI scope of work.
2. The Total Threshold Limit Concentration (TTLC) and Soluble Threshold Limit Concentration (STLC) values were used only to determine if the soils would be classified as hazardous waste in accordance with Department of Health Services (DHS) regulations. Other Applicable or Relevant and Appropriate Requirements (ARARs) standards, criteria and/or limitations will be used to determine if chemical concentrations pose a threat to surface and ground waters. As part of our investigations and data analysis work at HPNS, the ARARs will be developed with input from all appropriate regulatory agencies and utilized for remedial action purposes.
3. We will evaluate the lateral and vertical extent of contamination during the RI. Background levels for most constituents will be obtained by collecting data from areas considered to be uncontaminated.
4. Additional test borings and wells are planned for the Oil Reclamation Ponds to evaluate both the lateral and vertical extent of the contaminants.

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5. Additional soil and groundwater samples are to be collected in the Scrap Yard. Chemical analyses may include Waste Extraction Tests (WET) to evaluate the potential for leaching of metals out of the soil. Groundwater samples collected from monitoring wells should also provide data indicating if leaching has occurred.
6. Previous borings were limited to shallow depths because Polychlorinated Biphenyls (PCBs) were the suspected contaminant and were expected to be relatively immobile in the soil. Therefore, it was assumed that PCBs would be in the upper soils only. We will collect additional soil and groundwater samples at the Old Transformer Storage Yard during the RI.
7. No soil or groundwater samples were collected at the Pickling and Plate Yard. The investigation was limited to sampling of residue and sludges to determine if they presented an immediate hazard. Soil and groundwater sampling is planned for this site during the RI.
8. The Tank Farm will be investigated during the RI and soil and groundwater samples will be collected and analyzed.
9. The RI sampling plan for the Painting Area will include borings through the artificial fill and into the underlying bay mud.
10. During the RI, three monitoring wells will be installed in the Additional Area adjacent to the Sub-Base Sandblast Area.
11. The 5-gallon containers adjacent to Building 521 identified in the Initial Assessment Study (IAS) will be removed. Soil samples are to be collected and analyzed in the areas where those containers were stored.
12. All sites investigated in the Verification Step will be further characterized during the RI.
13. This letter provides the specific responses requested. Under the current plan, the Characterization Step of the Navy Assessment and Control of Installation Pollutants (NACIP) Program is incorporated into the RI, consistent with U.S. Environmental Protection Agency (EPA) terminology.
14. We intend to continue to investigate all sites that were investigated in the Verification Step of NACIP. Additional sites will be added to the RI, as necessary. The Building 503 PCB Spill Site, at which remediation is ongoing, will be addressed in the RI Work Plan. Asbestos in several areas is to be removed in the near future; cleanup of these asbestos areas is being coordinated with the Department of Health Services using the appropriate guidelines and regulations.

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We appreciate your comments and cooperation on the subject program. We will continue to work with you and the other regulatory agencies in the implementation of the IR program at HPMS. Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Mr. Alex E. Dong, Code 1146, (415) 877-7504).

Sincerely,

W. F. HARRIS
CAPTAIN, CEC, USN
ACTING COMMANDER

Copy to:

Department of Health Services, Emeryville (Attn: Ric Motini)
U.S. Environmental Protection Agency (Attn: Amy Zimpfer)
Environmental Health, City and County of San Francisco (Attn: David Wells)
San Francisco Office of the District Attorney (Attn: Steve Castleman)

Blind copy to:

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