

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704



April 18, 1988

Commanding Officer
Naval Station Treasure Island
Building I (Code 70)
San Francisco, CA 94130-5000
ATTN: Mr. Kam Tung

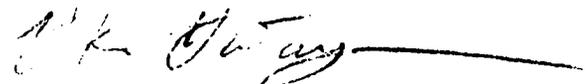
Dear Mr. Tung:

Attached are our comments on the Navy's proposed reconnaissance activities at Hunters Point Annex. Please revise this proposal and submit the final draft to us by May 16, 1988.

We realize the Navy and its consultant are anxious to begin the RI/FS at Hunters Point. However, because of DHS concerns that QA/QC and site safety procedures be fully addressed prior to any excavation work, we cannot approve the trenching and pilot boring programs (items 5 and 6 on page 1 of your proposal) until we accept the final QAPP and Site Safety Plan. However, once our enclosed comments are adequately addressed, you may proceed with the other tasks (items 1-4, 7 and 8 in the proposal) at your discretion.

Should you have any further questions, please contact Chein Kao of my staff at (415) 540-3052.

Sincerely,


Howard Hatayama
Chief, Site Mitigation
North Coast California Section
Toxic Substances Control Division

HH:wo

Attachment

cc: Attached List

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D/N 28

MAILING LIST - HUNTERS POINT

Telephone

Mr. Alex Dong, Head West Central Environment Section Department of the Navy Western Division Naval Facilities Engineering Command P.O. Box 727 San Bruno, CA 94066-0720	(415) 877-7494
Mr. Nicholas Morgan Remedial Project Manager U.S. Environmental Protection Agency 215 Fremont Street (T-4-3) San Francisco, CA 94105	(415) 974-8603
Mr. William Hurley California Regional Water Quality Control Board 1111 Jackson Street, Room 6040 Oakland, CA 94607	(415) 464-0841
Mr. Dave Wells Department of Public Health City and County of San Francisco 101 Grove Street, Room 207 San Francisco, CA 94102	(415) 558-3781
Mr. Scott B. Lutz Bay Area Air Quality Management District 939 Ellis Street San Francisco, CA 94109	(415) 771-6000

DHS COMMENTS ON PROPOSED RECONNAISSANCE ACTIVITIES, HUNTERS POINT

General Comment: When previous documents are referenced in the proposal, the specific page(s) of interest should also be cited. The failure to do so makes it both difficult and time-consuming to check cross-references, and ultimately delays the start-up of the proposed activities.

Surface Scintillation Survey: The term "100-foot centers" needs to be defined. Any proposal for grid sampling should refer to the distance between sampling points. A grid spacing of 100 feet is far too large to detect isolated pockets of radiation, since radioactivity falls off rapidly as you move away from the source. Ideally, the survey should be conducted using continuous readings along closely-spaced traverses (about 25 feet).

Topographic and Grid Surveying: Plate 1 shows the proposed locations of the pilot borings, geophysical survey lines and test trenches with no reference to any preliminary grid. The type of grid system planned should be specified, and a preliminary representation of this grid should be added to Plate 1.

Geophysical Test Program: The consultant should submit the results of the test program to DHS. This submittal can be a brief summary in the form of a letter report.

Geophysical Surveys: We will want to observe some of these surveys. Either the Navy or its consultant should notify DHS five (5) working days in advance of these surveys, and the method to be used should be specified. This will allow us sufficient time to coordinate with our Technical Support Section and arrange a possible site visit.

We also wish to receive copies of the survey data prior to interpretation. These should be sent to DHS within 5 working days of completion of each survey line.

Trenching: There are significant problems with the proposed trenching plan:

- 1) The soils beneath the landfill and bay fill areas are known to be heterogeneous. Trenching is recommended in part to verify the geophysical interpretations, yet trenches are only proposed between geophysical lines. Trenches should be either directly on or immediately adjacent to the survey lines.

- 2) In parts of the Bay Fill and Sub-base areas trenches are proposed running perpendicular to the geophysical lines, rather than parallel to them. This needs to be corrected.
- 3) No mention has been made as to what the Navy intends to do with the excavated soil. This deficiency should be addressed.
- 4) The proposal refers to the Site Safety Plan for trenching procedures, yet trenching operations in the safety plan are only mentioned in passing. Specific construction and safety procedures will have to be developed before trenching can be approved.

Since geophysics is being used to define the landfill boundaries, it is unnecessary to trench every profile. This defeats the purpose of using geophysics and creates an additional exposure risk. It should only be necessary to trench a representative number of profiles for correlation. Additional trenching should be limited to areas where the geophysics gives ambiguous results.

The Department will want to be on hand to observe the trenching activities. Again, we should be given 5 working-days' notice prior to start-up.

Drilling of Pilot Borings: The number and locations of the proposed borings are insufficient to adequately characterize the lithology. However, we are willing to accept the current boring proposal, under the condition that the results of these borings will be used to plan additional pilot holes.

The specific reference to grouting in the QAPP needs to be cited. The only references we found (pages 6-1 and 6-5 in the QAPP) defer details to the sampling plans. If there is no specific reference to grouting in the QAPP, this procedure should be spelled out in this section.

On page 5, second paragraph, the reference to surface samples in the second sentence should be deleted. You don't need borehole information to collect surface samples.

As mentioned for the Geophysical Surveys, we want to see copies of the lithologic logs and uninterpreted copies of the downhole geophysical logs. The same submittal time applies.