



Department of Toxic Substances Control

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HUNTERS POINT
SSIC NO. 5090.3



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Agency Secretary
California Environmental
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February 21, 2001

Commanding Officer
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
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Attention: Richard Mach

FINAL SAMPLING AND ANALYSIS PLAN (TIME-CRITICAL REMOVAL ACTION), PARCEL C SITE DELINEATION, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Dear Mr. Mach:

California Department of Toxic Substances Control has completed the review of Final Sampling and Analysis Plan, Parcel C Soil Site Delineation, Hunters Point Shipyard, San Francisco, California DS.0011.15694 (SAP). The SAP, dated January 18, 2001, was prepared for the Department of the Navy, Southwest Division, Naval Facilities Engineering Command (Navy) by Washington Group International, Inc. And Tetra Tech EM Inc. It is important to note that this document is intended to direct the Time-Critical Removal Action (TCRA) and should not be confused to be a new plan or addendum to the Remediation Investigation Sampling and Analysis Plan. We want to reiterate our comments during the review of the draft Plan that Exploratory Excavation (EE) confirmation samples (Appendix C) have not been reviewed. Both EE and this TCRA will have to be reevaluate based on the final remediation goals at the Feasibility Study/ Proposed Plan stage for their completeness.

Our comments are provided below.

Comments

1. TCRA cleanup goals (or removal action goals). It should be noted

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that the final remediation goals are to be set in the Record of Decision (ROD) and they may not be the same as the Navy's TCRA cleanup goals.

2. In general, the sampling proposed extends the remedial investigation for some sites, especially with regard to subsites which have a single sample or very few samples. For site characterization sampling, DTSC's position is that risk-based screening criteria should be used. Tables and figures should show all exceedences of risk-based criteria, not just exceedences of the Navy's TCRA cleanup goals.

For example, DTSC disagrees with the Navy's exclusion of samples (and sites) with PAHs above risk-based criteria but below the Navy's TCRA cleanup goals.

In addition, it is noted that reporting limits for PAHs and cyanide are cited as TCRA cleanup goals, and that these reporting limits are higher than risk-based criteria. However, for tetraethyl lead, risk-based criteria are cited as TCRA cleanup goals, despite the higher reporting limit for tetraethyl lead.

3. Response to comments, page 5, comment 5. Dropping chemicals of potential concern (COPCs). It is noted that the Navy has agreed to not drop COPCs as an investigation/excavation proceeds.

4. Response to DTSC's Comments, page 6, comment 6. Tentatively identified compounds (TICs). Please note that TICs should be explicitly summarized in the report which summarizes field activities.

5. Response to DTSC's Comments, comment 7, and elsewhere. Waste profiling results. Please note that any exceedences of risk-based criteria in waste profiling reports should be explicitly summarized in the report which summarizes field activities.

6. Response to DTSC's Comments, page 15, comment 2 and Table 2. Regarding de minimus area 8025 (DM8025), the Navy does not propose action for manganese exceedence (at 1900 mg/kg) in the buffer zone area. Since residential goals apply in the buffer zone, it is not consistent to exclude DM8025 from further action. DM8025 should be included as a manganese site.

7. SAP Overview, page 5, paragraph 2, and elsewhere. The Navy designates "non-VOC [volatile organic compound] sites as those sites where "...VOCs are not the only contaminants that exceed removal action cleanup goals". As previously noted, the use of the terminology "non-VOC sites" to apply to sites where VOCs do exist or may likely exist

is strongly discouraged, since it is obfuscating and misleading terminology.

8. SAP Overview, page 12. To be consistent with text elsewhere in the SAP and especially with Table 2 of the Field Sampling Plan (FSP), please delete "only" from the sentence: "The samples collected from each soil site will be analyzed *only* for the site-specific contaminants present at levels that exceeded the removal action cleanup goals for soil." (Emphasis added).

Similarly, in the FSP, page 3, paragraph 2, please amend the text by the phrase shown in italics to the end of the sentence: "Samples will be analyzed for chemicals of potential concern (COPCs) as listed in the SAP and QAPP, *and for additional compounds as indicated on FSP Table 2.*"

9. FSP, Appendix B. Copy error. The chain of custody form is illegible: only a portion of the form has been copied onto the page. Similarly SOP .019 and HMLs SOP are poor quality reproductions.

10 QAPP Table 1-1. Please amend the footnote to read "HPALs are ambient levels of metals", not "background" levels of metals.

If you have any questions, Please contact me at (510) 540-3822.

Sincerely,



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