



DEPARTMENT OF THE NAVY
NAVAL STATION
TREASURE ISLAND
SAN FRANCISCO, CALIFORNIA 94130-5000

NOO217.000417
HUNTERS POINT
SSIC NO. 5090.3

IN REPLY REFER TO:

5090

Ser 00E/1673

08 JUL 1988

Mr. Andrew M. Lichterman
Litigation Director
Western States Legal Foundation
1440 Broadway, Suite #420
Oakland, CA 94612

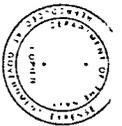
Subj: HUNTER'S POINT ANNEX COMMUNITY RELATIONS PLAN

Dear Mr. Lichterman:

We appreciate the time and effort spent to provide a written summary of your concerns regarding the community relations effort for the Hunter's Point Annex Installation Restoration Program. We have carefully considered all your comments and incorporated many of the suggestions into our Community Relations Plan. A few of your suggestions, however, were not adopted as part of the Plan and we thought it would be helpful to explain those to you at this time.

First, however, we want to respond to a couple of your concerns that evidence a misunderstanding of the purpose and scope of the hazardous waste investigation being conducted at Hunter's Point Annex. You state that "the Navy is segmenting its investigation and cleanup into construction area and non-construction area components" and "cleanup is being driven by the Navy's construction plans and not by environmental considerations." This is not accurate. The Remedial Investigation/Feasibility Study (RI/FS) at Hunter's Point Annex includes all areas of known or suspected contamination. The entire installation Restoration Program is being carried out in accordance with applicable federal and state law. Any necessary remedial action will be driven by all factors appropriately addressed in the Feasibility Study including environmental, land use, and economic considerations. In preparation of RI/FS the Navy will comply with all legal requirements for public notice and community involvement.

Some site investigations relating to construction projects are planned, but these are not part of the RI/FS. These are separate investigations designed to ensure that the construction sites, which are not suspected of being contaminated, are in fact uncontaminated. Additionally, as requested by the Environmental Protection Agency (EPA), these investigations will address any relationship the construction may have with the on-going RI/FS. The workplans detailing the investigation of any such construction sites, as well as the report on the results of the investigation, will be included in the administrative record since they will serve to add to the database on existing conditions at Hunter's Point Annex. Construction would proceed at these sites only after it was confirmed by the Navy in consultation with federal, state and local regulatory agencies that the area poses no health hazard and that construction would not interfere with any remedial actions necessary at the RI sites.



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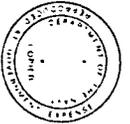
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Subj: HUNTER'S POINT ANNEX COMMUNITY RELATIONS PLAN

Secondly, your letter states that, 'Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)/Superfund Amendments and Reauthorization Act (SARA) requires the Remedial Action Plan for the entire facility to be prepared and the public be given an opportunity to comment on it before cleanup begins.' Actually this is not a correct statement of the requirements that govern Superfund cleanups. Section 300.68 of the National Contingency Plan provides that remedial actions, can be conducted in operable units. Implementation of operable unity may begin before selection of an appropriate final remedial so long as such measures are cost-effective and consistent with a permanent remedy. As you correctly note public comment would be solicited before such operable units were implemented. Because of the size and complexity of the RI/FS at Hunter's Point, it is conceivable that remedial actions will be proposed in operable units. The Scoping Document contains a more detailed explanation and rationale for the grouping of sites for purposes of the RI/FS work.

In response to some of your specific suggestions, actual construction plans for any new buildings at Hunter's Point Annex are not anticipated to be included in the administrative record for the cleanup of Hunter's Point Annex. These documents should be distinguished from construction site investigation workplans and report which, as explained above, will be included.

At this time the Navy does not intend to routinely provide free copies to the public of all documents in the Repository. The placement of documents in the Repository at San Francisco Public Library, Anne E. Waden Branch is intended to accomplish the goal of keeping the public informed as to the Navy's activities at Hunter's Point Annex. If use of the Repository is not adequate for some specialized need, individual requests for documents will be handled on a case-by-case basis. The Navy has proposed establishing a second Repository at the San Francisco Main Library to accommodate the interested public in the greater Bay Area.



Inter-agency agreement are only entered into for sites listed on the National Priorities List. Hunter's Point Annex is not presently listed nor proposed for listing. If that situation should change, then information relating to the agreement would be available in the Repository.

The Navy has prepared a 'Scoping Document' which summarizes in one place the various investigations that have been conducted, which areas have been covered, basic sampling methodologies and summary results for each, as well as an overview of the proposed RI/FS work to be conducted. The Scoping Document has been reviewed by federal, state and local regulatory agencies and is available in the Repository. Also monthly progress reports are prepared and will be placed in the Repository.

Finally, the Navy is aware of your concern that there may yet be undiscovered contamination at Hunter's Point Annex. We have done considerable investigation into all heretofore known sources of contamination, including the allegations of illegal disposal activity by Triple A Machine Shop. We believe that it is

Subj: HUNTER'S POINT ANNEX COMMUNITY RELATIONS PLAN

important to now begin field work on the known areas of contamination. At the same time, however, we are conducting a broader, more intensive preliminary assessment type review of records, personal interviews, and physical surveys to attempt to locate any additional potential areas of contamination. Any time a significant release or threatened release is discovered, it will be added to the on-going Remedial Investigation study.

A List of Documents currently located in the Repository is enclosed for your information. I hope that this letter and the documents now available through the Repository have responded to your concerns.

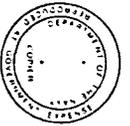
Sincerely,



C. T. VAUGHT
Captain, U. S. Navy
Commanding Officer

Enclosure (1):
A List of Documents

Copy to:
Department of Health Services (Attn: Mr. Dwight Hoening)
Bay Area Air Quality Management District (Attn: Mr. Scott Lutz)
U. S. Environmental Protection Agency (Attn: Mr. Jerry Clifford)
Regional Water Quality Control Board (Attn: Mr. Roger James)
City and County of San Francisco (Attn: Mr. David Wells)



PRELIMINARY ASSESSMENT REPORTS

Initial Assessment Study of Hunters Point Naval Shipyard (Disestablished). San Francisco, California, NEESA 13-059, Oct. 1984

Harding Lawson Associates, Hazardous Ranking System Package, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California, March 1988.

SITE INVESTIGATION REPORTS

EMCON Associates, Proposed Verification Step Plan of Action, Hunters Point Naval Shipyard (Disestablished). San Francisco, California, April 1986.

EMCON Associates, Health and Safety Plan, Hunters Point Naval Shipyard (Disestablished), San Francisco, California, May 1986.

EMCON Associates, Confirmation Study, Verification Step, Hunters Point Naval Shipyard (Disestablished), San Francisco, California, 19 Mar. 1987 (4 Volumes).

EMCON Associates, Area Study for Asbestos-Containing Material and Organic and Inorganic Soil Contamination, Hunters Point Naval Shipyard (Disestablished), San Francisco, California, 2 Jul 1987 (2 volumes).

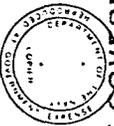
EMCON Associates, Verification of Hazardous Waste Contamination at Specific Sites, Hunters Point Naval Shipyard, San Francisco, CA, 23 Sept. 1987.

Harding Lawson Associates, Evaluation of Pickling Tank Emergency Containment Structure, Naval Station, Treasure Island, Hunters Point Annex, 29 Jan. 1988.

ERM-West, Hunters Point Naval Shipyard, Soil and Water Sampling Near Proposed Galley, June 1987.

Harding Lawson Associates, Subsurface investigation, Proposed Galley, Hunters Point Naval Shipyard, 30 July 1987.

ATT, Risk Assessment Proposed Housing Areas 1 and 2 (2 volumes), Naval Station, Treasure Island, Hunters Point Annex, Dec. 1987.



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Harding Lawson Associates, *Site Study South Pier Utilities Project Naval Station Treasure Island, Hunters Point Annex, San Francisco, CA, 28 Dec. 1987.*

Harding Lawson Associates, *Work Plan - Supplemental Site Study Proposed Galley, Naval Station, Treasure Island, Hunters Point Annex, 23 Sept. 1987.*

Harding Lawson Associates, *Site Study Work Plan, Public Works Complex - Auto Repair Shop, Naval Station, Treasure Island, Hunters Point Annex, 28 Dec. 1987.*

Harding Lawson Associates, *Site Study Work Plan, Medical/Dental Facilities, Naval Station, Treasure Island, Hunters Point Annex, 29 Dec. 1987.*

Harding Lawson Associates, *Site Study Work Plan, Administrative and Training Facility, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, CA, 13 Jan. 1988.*

Harding Lawson Associates, *Site Study Work Plan, North Pier Modification, Naval Station, Treasure Island, Hunters Point Annex, 21 Jan. 1988.*

Harding Lawson Associates, *Site Study Work Plan, Public Works/Operations and Maintenance Facilities, Naval Station, Treasure Island, Hunters Point Annex, 26 Jan. 1988.*

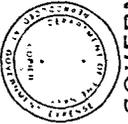
Harding Lawson Associates, *Site Study Work Plan, Physical Fitness Facilities - Gymnasium, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, CA, 28 Jan. 1988.*

Harding Lawson Associates, *Site Study Work Plan, Utilities Improvement, Naval Station, Treasure Island, Hunters Point Annex, 28 Jan. 1988.*

Martin Marietta Energy Systems, Inc., *Work Plan for Underground Tank Investigation, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California, Volume I: Work Plan, 2 May 88.*

Martin Marietta Energy Systems, Inc., *Work Plan for Underground Tank Investigation, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California, Volume II: Sampling Plan, 2 May 88.*

Martin Marietta Energy Systems, Inc., *Work Plan for Underground Tank Investigation, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California, Volume III: Quality Assurance/Quality Control Plan, 2 May 88.*



Harding Lawson Associates, *Storm Water Runoff Investigation, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California*, June 1988.

Martin Marietta Energy Systems, Inc., *Work Plan for Underground Tank Investigation, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California*, Volume IV: Health and Safety Plan, 2 May 88.

RELEVANT REMOVAL DOCUMENTS

ERM-West, *Hunters Point Naval Shipyard Preliminary Investigation of Possible PCB Spill*, Sept. 1986.

ERM-West, *Hunters Point Naval Shipyard PCB Investigation*, Nov. 1986.

WESTNAVFACENCOM, *Work Plan Cleanup of PCB Contaminated Soils near Building 503 Hunters Point Naval Shipyard, San Francisco, California*, 11 Dec. 1986.

ERM-West, *Investigation of PCBs in Soil and Groundwater at the Hunters Point Site*, 21 Jan. 1987.

AEMC ltr to WESTNAVFACENCOM, Subj: *PCB: Soil Removal, Hunters Point*, 27 Jan. 1987. (AEMC Health and Safety Plan attached.)

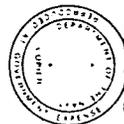
ERM-West ltr to WESTNAVFACENCOM, Subj: *Hunters Point - PCB Cleanup Work: Health and Safety Plan*, 27 Feb. 1987. (ERM-West Health and Safety Plan attached.)

ERM-West, *Hunters Point Naval Shipyard PCB Verification Sampling Results, Interim Report*, Apr. 1987.

ERM-West, *Work Plan for Clean up of Asbestos Containing Material (ACM), Naval Station, Treasure Island, Hunters Point Annex*, 18 Feb. 1988.

ERM-West, *Groundwater Monitoring Plan, Hunters Point Naval Shipyard PCB Spill Site Near Former Building 503*, 21 Sept. 1987.

ERM-West, *Hunters Point Annex, Treasure Island Naval Station PCB Verification Sampling Results Area 2*, Dec. 1987.



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QUALITY ASSURANCE PROJECT PLAN

Harding Lawson Associates, *Work Plan Volume 3, Quality Assurance Project Plan, Naval Station, Treasure Island, Hunters Point Annex*, Jan. 1988.

INITIAL WORK PLAN AND ANY AMENDMENTS THERETO

Harding Lawson Associates, *Work Plan Community Relations Plan, Ex-Hunters Point Naval Shipyard*, 6 Oct. 1987.

Harding Lawson Associates, *Draft Work Plan Volume 2A, Sampling Plan - Group I Sites, Remedial Investigation/Feasibility Study, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, CA*, 7 March, 1988.

Harding Lawson Associates, *Draft Work Plan Volume 2B, Sampling Plan - Group II Sites, Remedial Investigation/Feasibility Study, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, CA*, Jan. 1988.

Harding Lawson Associates, *Draft Work Plan Volume 2C, Sampling Plan - Group III Sites, Remedial Investigation/Feasibility Study, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, CA*, 28 Feb. 1988.

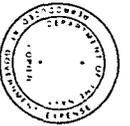
Harding Lawson Associates, *Draft Work Plan Volume 2D, Sampling IV Sites, Remedial Investigation/Feasibility Study, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, CA*, 4 Feb. 1988.

Harding Lawson Associates, *Draft Work Plan Volume 2E, Air Sampling Plan, Remedial Investigation/Feasibility Study, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, CA*, 12 Feb. 1988.

Harding Lawson Associates, *Work Plan Volume 3, Quality Assurance Project Plan, Naval Station, Treasure Island, Hunters Point Annex*, Jan. 1988.

Harding Lawson Associates, *Draft Work Plan Volume 5, Site Safety Plan, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, CA*, 14 Apr. 1988.

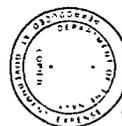
* N/A = Not available yet.



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Harding Lawson Associates, *Scoping Document, Remedial Investigation/Feasibility Study, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, CA, 3 Mar. 1988.*

Harding Lawson Associates, *Draft Work Plan Volume 6, Public Health and Environmental Evaluation Plan, Remedial Investigation/Feasibility Study, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, CA, June 1988*



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