

## DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY  
BERKELEY, CA 94704

September 22, 1988

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

## DHS COMMENTS ON REVISED GROUP II SITES SAMPLING PLAN

Dear Mr. Tung:

Enclosed are our comments on the revised Group II sites sampling plan for Hunters Point Annex. Most of our comments have been adequately addressed in this revision, so you may proceed with the initial RI work on these sites. However, several areas have not been addressed to our satisfaction, and you will need to update these areas before you may proceed with their implementation. These sections are covered in our comments.

We only found one error in the revised text; this is discussed in the first paragraph of our comments. The rest of our comments deal with omissions to the revision that were discussed in your response letter of July 8, 1988 (Enclosure 2 of the revised sampling plan).

Please revise this sampling plan and submit the final revision by November 2, 1988.

If you have any further questions, please contact William Owen of my staff at (415) 540-2592.

Sincerely,

*J. Solary for*

Howard Hatayama, Chief  
Site Mitigation Unit  
Region 2  
Toxic Substances Control  
Division

Enclosure

cc: attached list

HH:wo

509  
D/N 37

**COMMENTS ON REVISED GROUP II SAMPLING PLAN AND  
REBUTTAL TO RESPONSE DATED JULY 8, 1988**

1. There is a typo on page 4 of the revised plan: "The Navy plans to complete the RI/FS process...by the end of 1988." Please revise this sentence accordingly.
2. Response I.A. With regards to the use of statistics, the Navy is overlooking one important point. With the possible exception of a few sites, possible sources of contamination at Hunters Point are not well defined. For the Group II sites, former Building 503 and Building 521 are prime examples. For cases such as these, the use of "hot spot" analyses are prudent. The elimination of these methods will only be considered by DHS when the Navy can make a strong case for their exclusion. Unfortunately, this will not be possible until after the RI/FS investigation is well underway.
3. Response I.B. The Navy is correct when it points out that the preliminary PHEE cannot be practically incorporated into each work plan. However, it is possible to provide a concise summary of the conceptual model used in the PHEE, and direct the reader to the PHEE for more information. These elements should be incorporated into the work plans.
4. Response II.B.1. It is the Department's opinion that the approach to characterizing Hunters Point does not constitute a phased study. The Navy has made a tentative step in the right direction by adding a reconnaissance study. However, the contingency sampling amounts to only a small fraction of the total samples planned for the RI. As such, this cannot constitute a separate phase of study. Given the large amount of work scheduled for this facility, one way to phase the RI would be to execute the present work plan in several steps, and wait for the initial results before starting subsequent activities. We feel this is a prudent approach that may reduce the possibility of redundancy, and will only require minor revisions to the work plan.
5. Response II.C.1. The Navy's approach to determining potential radioactive contamination is adequate, with the provision that a gamma scan be added for ground-water samples from suspect areas.

6. Response II.E.1. The Navy's response to drilling in the bermed areas is adequate for now, but if subsurface contamination is detected in the bermed areas, we will require deeper sampling inside the berms.
7. Response II.E.6. Our emphasis on sampling bedrock is based on observations made during the construction of a storm sewer line near Hunters Point. Trenches excavated into bedrock showed that almost all groundwater flow occurred within the weathered zone, which was about 6 feet thick. The sump that drained this portion of the trench was pumping at about 10 gpm (this is a very rough estimate). The above information is for informational purposes--no revision to the work plan is required.
8. Response II.F.1. To clarify our position, the pilot boring at Building 503 is to assist in obtaining a picture of the stratigraphy at Hunters Point. The core sample from bedrock is to assess the possibility of groundwater flow in bedrock, not to assess PCB contamination. A physical analysis of the core is all that is needed at this time--no chemical analysis of the bedrock sample was either implied or required. Since the Navy has agreed with this approach in Response II.I.1., our comment stands.
9. Response II.G.1. The Navy has raised a valid comment regarding the utility of fracture analysis. Fracture analysis results can be evaluated after initial samples are collected. In the meantime, our comment stands.
10. Response II.G.2. The Navy has raised a valid issue regarding the cost-effectiveness of sampling. However, we are still concerned about migration and illegal disposal of wastes. Therefore, Comment II.G.2. should be revised to read "A representative number of borings at this site should be sampled to just below water table and analyzed for TPH, PCB, SOC and VOC."
11. Response II.G.3. To clarify our position, Comment II.G.2. should only apply if ground water is encountered within 15 feet of the surface.
12. Response II.H.1. Our comments are the same as for #10 above.
13. Response II.I.4. The Navy has not indicated in this response whether the tanks were possibly used for the illegal storage of hazardous wastes. Until this is addressed, our comment stands.

14. Response II.I.5. It is appropriate, given the Navy's arguments, to evaluate site PA-12 as described. As usual, the results of the PA/SI should be sent to the Department. No revision to the work plan is necessary.