

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704



November 30, 1988

Commanding Officer
Naval Station Treasure Island
Building 1 (Code 70)
San Francisco, CA 94130-5000
ATTN: Mr. Kam Tung

CONDITIONAL APPROVAL OF GROUP IV SITES SAMPLING PLAN

Dear Mr. Tung:

Based on our review of the proposed revisions to the Group IV sites sampling plan, Hunters Point Annex, we hereby give conditional approval to the plan. Most of our initial comments have been adequately addressed in this revision, but three items have yet to be addressed to our satisfaction. Approval of the Group IV sites sampling plan is conditional upon addressing these enclosed items in the final draft.

Please incorporate these comments in the sampling plan and submit the final revision by December 30, 1988.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Howard Hatayama", with a horizontal line extending to the right.

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

Enclosure

cc: attached list

HH:wo

MAILING LIST - HUNTERS POINT

Telephone

<u>Ms. Louise Lew, Head</u> West Central Environment Section Department of the Navy Western Division Naval Facilities Engineering Command P.O. Box 727 San Bruno, CA 94066-0720	(415) 877-7502
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. Lester Feldman California Regional Water Quality Control Board 1111 Jackson Street, Room 6040 Oakland, CA 94607	(415) 464-1332
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
Ms. Lisa Teague Harding Lawson Associates 7655 Redwood Boulevard P.O. Box 578 Novato, CA 94948	(415) 892-0821

COMMENTS ON PROPOSED REVISIONS TO GROUP IV SAMPLING PLAN
DATED SEPTEMBER 16, 1988

1. Response I.B. The conceptual site model describes the nature of the problems at the facility, and provides a specific rationale for doing the RI/FS. The Department therefore requires that the conceptual site model summary be included. We do not, however, require that every site at Hunters Point be included in the summary. Only those sites specific to the work plan need to be discussed in the conceptual model. The content of the summary has been discussed both in Comment I.B. and in telephone conversations with the Navy's consultant.
2. Response II.A.1. It is the Department's opinion that the approach to characterizing Hunters Point does not constitute a phased study. However, the Navy has proposed a revision to the Group II Sites Sampling Plan ("Responses to Department of Health Services Comments on Revised Group II Sampling Plan", October 25, 1988) that emphasizes a phased approach. This approach would also be acceptable for this workplan.
3. Comment II.D.4. Regarding the potential conflict between DHS and the RWQCB over the use of well clusters, we have discussed this issue with Mr. Don Dalke of the RWQCB, and both agencies agree that installing short-screened wells and well clusters is a valid initial approach to the RI/FS. This procedure may be changed once data become available to evaluate the effectiveness of this approach. The Navy should therefore proceed as directed by DHS.