

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704



December 23, 1988

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

DHS COMMENTS ON PROPOSED PHEE REVISIONS, HUNTERS POINT

Dear Mr. Tung:

Enclosed are the Department's comments on the proposed revisions to the PHEE for Hunters Point Annex. Unfortunately, the proposed revisions contain numerous deficiencies that need to be addressed before the Department can approve this document. These deficiencies are covered in our comments.

Please revise this document in accordance with our comments and submit the final draft by February 3, 1989.

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

Sincerely,

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

Enclosure

cc: attached list

HH:wo

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D/N 44

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**DEPARTMENT OF HEALTH SERVICES COMMENTS ON PROPOSED
PHEEP REVISIONS, HUNTERS POINT ANNEX**

Response I.A. The proposal outlined in this response is satisfactory. However, chemical analyses of the runoff should be added to this approach (this could be accomplished by referring to the "Proposed Reconnaissance Study of Storm Water Quality, Hunters Point Annex", dated November 21, 1988).

Response I.B. These comments have been adequately addressed by this response, and should be deferred to the final PHEEs.

Response II.G. This response should be included in Task 4.1 of the PHEEP.

Response II.H. Use of such differing references as ADIs, AICs, etc. could lead to confusion on the part of the uninitiated reader. Instead, an acceptable alternative would be to use the term Maximum Exposure Level, and provide the references for the source of the value (e.g. AIC, RfD, ADI, etc.). Page 4-13 of the Site Mitigation Decision Tree discusses use of the MEL.

Response II.I. For indicator chemicals that are carcinogens and have no published q^* values, the Navy should calculate q^* values for these carcinogens, contingent upon the availability of data.

Response III.A. A statement should be added in the executive summary stating that radioactive compounds may be present at HPA, and that screening for these chemicals will be conducted during the remedial investigation.

Response III.B. This response should be summarized in Section 4.2 of the PPHEE.

Response III.E. Since the PPHEE is a part of the framework of studies that will be conducted during the RI/FS, erroneous and/or unsubstantiated conclusions should be modified or deleted whenever possible. Therefore, our original comment stands.

Response III.I. Current tenants and future residents at HPA may not fit into the criteria of voluntarily exposed workers, nor may they be in the same age range and health status as workers for which TLVs are intended. Therefore, our original comment stands.

Response III.J. This response should be incorporated into page 4-34 of the PPHEE.

Response III.K. This response should be incorporated into page 4-36 of the PPHEE.

Response III.L. The PPHEE is intended to serve as a "cornerstone" document, to provide a conceptual foundation for performing the RI/FS. The fact that the Navy has prepared the RI/FS workplans in advance of the PPHEE by no means reduces the care that needs to be taken in addressing data gaps. The sampling plans are primarily technical documents that do not specifically spell out the data gaps that are being addressed. In addition, revisions to the work plans may be necessary should site conditions differ from initial assumptions. Since the PPHEE is meant to provide a conceptual framework for both the public and the technical staff performing the RI, specific data gaps need to be addressed here. Therefore, our original comment stands.

Response III.N. This response does not adequately address our comment. Regardless of whether or not IRMs have been discussed during monthly meetings, they still need to be documented in the PPHEE. Therefore, our comment stands.

Response III.O. This response should be included in the PPHEE.

Response III.P.2. After review by our staff toxicologist, it remains the Department's opinion that the current selection of indicator chemicals is insufficient and is not consistent with the Superfund Public Health Evaluation Manual (SPHEM, EPA 540/1-86/060, 1986). Page 14 of the SPHEM states "It is not intended that the indicator chemical selection process exclude any chemical that may cause significant human or environmental harm. Rather...[it] is to ensure that all chemicals posing a significant risk to human health are addressed and to focus the public health evaluation on the primary chemicals of concern." The selection of too few indicator chemicals may result in a serious underestimation of exposure risk. It is the Department's position that the PPHEE should develop an initial list of indicator chemicals. This initial list may be pared down in the final PHEEs, but only after sufficient data have been collected to justify exclusions. Therefore, our comment stands.

Response III.P.3. Please correct the typo, as previously requested.

Response III.P.4. Our comment stands. Children may have access to the site once housing is constructed. In addition, recent data indicate that there is an extreme risk

of developmental toxicity from in utero lead exposure in pregnant women. Currently, the primary concern should be for pregnant women, or women who may conceive in the near future, who are working on-site and may be at risk.

Response III.P.5. Our comment stands. The reference is unsupported and should be deleted.

Response III.P.5. (cont.) The response to the second part of Comment III.P.5. should be added to the PPHEE.

Response III.P.6. The PPHEE should be revised to note that the potential for tracking releases and their effects will be examined in the final PHEEs.

Response III.Q.2. See Response III.P.2. above. The response regarding molecular sulfur should be added to the PPHEE. The response regarding 1,3-oxathiolane should also be included in the PPHEE. Regarding tin, no indication has been given as to whether organic or inorganic tin is present. Although less toxic than the alkyl tins, even inorganic tin is toxic to marine life. Tin may also add to the toxicity of other metals. Tin should be added to the preliminary list of indicator chemicals. It may be removed from consideration when it can be demonstrated that it does not pose a problem.

Response III.R.2. See Response III.P.2. above.

Response III.R.4. The Navy's comment has been noted. However, it is the Department's position that the document should be consistent throughout. Therefore, our comment stands.

Response III.S.1. The specific PCB found, the number of borings that detected it and its approximate concentration range should be noted in Section 2.6.4.