

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

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RELEASE #13

Hunter's Point Annex

Information Release

Environmental Clean-Up Process

HUNTERS POINT ANNEX PROPOSED FOR LISTING ON NATIONAL PRIORITIES LIST BY THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY.

The United States Navy announced today that Hunters Point Annex, Naval Station Treasure Island, has been proposed for placement on the National Priorities List by the United States Environmental Protection Agency. This proposed listing is the subject of this Information Release. Topics covered by this Information Release include:

- o What is the National Priorities List?
- o What is the listing process?
- o The United States Navy, working cooperatively with the State of California, has been investigating Hunters Point Annex since December 1987.
- o The role of the United States Environmental Protection Agency in the Navy's ongoing investigation.
- o Significance of Hunters Point Annex on National Priorities List.
- o What is an Interagency Agreement?
- o Availability of Technical Assistance Grants.
- o The Continuing role of the State of California: a Letter from the Regional Director of the Toxic Substances Control Division, California Department of Health Services.
- o Where to go for questions?
- o Will removal actions proposed by the Navy be affected?

WHAT IS THE NATIONAL PRIORITIES LIST?

The National Priorities List is a tool developed by the United States Environmental Protection Agency (EPA) to identify the areas within the country posing the greatest potential threat to public health and/or the environment. Pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), also known as the "Superfund", EPA is required by law to update this list annually. The list serves to inform the public of the location and contaminants present at potentially hazardous waste sites and to allow EPA to establish priorities for remedial actions. There are currently 890 final sites identified nation-wide on the National Priorities List.

EPA is also required to evaluate each Federal facility such as Hunters Point Annex for inclusion on the National Priorities List. Unlike privately-owned facilities, however, EPA can not spend its own "Superfund" money on a clean-up at a federal facility. The clean-up of Hunters Point Annex will be funded from the Defense Environmental Restoration Account, which is the "superfund" for all Department of Defense facilities.

Placement of a Federal facility on the National Priorities List triggers a series of actions including higher priority for receiving Defense Environmental Restoration Account funds, increased involvement of EPA staff, the negotiation of an Interagency Agreement between the Navy and EPA as well as the State of California should the state so desire. Inclusion of Hunters Point Annex on the National Priorities List also establishes the availability of a Technical Assistance Grant to a community group. Finally, placement on the National Priorities List imposes a deadline on the Navy to begin a Remedial Investigation on Hunters Point Annex - which the Navy has already met.

WHAT IS THE LISTING PROCESS?

Potentially hazardous waste sites in the United States are either in the process of being considered or have been considered for placement on the National Priorities List. The process begins with consideration of information from a Preliminary Assessment, which is a survey of records, interviews with past and present employees, and natural and demographic characteristics of the surrounding area. Information from this Preliminary Assessment is typically supplemented with results of samples and chemical analysis. A mathematical model called the Hazard Ranking System is used to quantify these characteristics and generate a hazard ranking score which can then be compared to other hazardous sites across the country.

The Navy completed its Preliminary Assessment of Hunters Point Annex in 1984. A Confirmation Study, including preliminary sampling and chemical analysis, was completed in March 1987. EPA used these studies and other relevant information to evaluate Hunters Point Annex using the Hazard Ranking System model. Based upon their results, EPA has proposed that Hunters Point Annex be included on the National Priorities List.

The proposed addition of Hunters Point Annex to the National Priorities List is the first step in a review process conducted by the EPA. This proposal will be subjected to a formal 60-day public review and comment period before a final decision is made whether to place it on the National Priorities List. The final decision by the EPA will be published in the Federal Register.

Written comments on this proposed listing can be sent to Mr. Larry Reed, Acting Director, Hazardous Site Evaluation Division, EPA Headquarters (OS-230), 401 M Street S.W., Washington, D.C. 20460.

THE UNITED STATES NAVY, WORKING COOPERATIVELY WITH THE STATE OF CALIFORNIA, HAS BEEN INVESTIGATING HUNTERS POINT ANNEX SINCE DECEMBER 1987.

While the announcement of today's proposal to place Hunters Point Annex on the National Priorities List is a new development, the continuing efforts by the Navy and the State of California to clean-up Hunters Point Annex is not. Since December 1987, the Navy and the State of California have been working cooperatively to plan and implement a Remedial Investigation of Hunters Point Annex pursuant to the Navy's Installation Restoration Program (described on next page). The Navy has been fully committed to the environmental clean-up of Hunters Point Annex from the beginning. This proposal for inclusion on the National Priorities List does not change that commitment.

Since 1987 the Navy has completed the following major documents:

Scoping Document

Community Relations Plan

Project Management Plan

Sampling Plans - Group I Sites, Group II Sites,
Group III Sites and Group IV sites

Air Sampling Plan

Quality Assurance Project Plan

Data Management Plan

Site Safety Plan

Public Health and Environmental Evaluation Plan

Feasibility Study Plan

Preliminary Assessment - Triple A Sites

Fence-to-Fence Hazardous Waste/Materials Survey

Area Study

Final Work Plan - Underground Tank Investigation

Risk Assessment: Housing Sites Number 1 and 2

Summary Report - Interim Cleanup of PCB Spill Near
Former Building 503

THE CLEANUP PROCESS

The environmental cleanup process used by the Navy is known as the Installation Restoration Process (IRP). It is a process fully consistent with federal and state environmental laws. The process is shown to the right.

The Installation Restoration Process is done deliberately and carefully in coordination with the regulatory and advisory agencies shown below.

The major remaining steps in the process begin with extensive sampling of each IR site to determine the type, degree, and extent of contamination. After samples have been carefully analyzed by a laboratory certified by the State of California, a Feasibility Study will consider the cleanup options. From this study, a cleanup plan is proposed, reviewed by the public and regulatory agencies, finalized, and implemented.

Even then, the process is not over. A long-term monitoring program will begin to assess how well the cleanup solution(s) works over time. If problems arise, the Installation Restoration Process is repeated.

The Navy is fully committed to the thorough and responsible environmental cleanup of Hunters Point Annex and remediation of past industrial practices which may be a potential threat to public health or the environment.



AGENCIES CONSULTED IN SITE STUDY AND CLEAN-UP PROCESS

- U.S. Environmental Protection Agency
- California Department of Health Services
- California Regional Water Quality Control Board
- Bay Area Air Quality Management District
- California Department of Fish and Game
- U.S. Fish and Wildlife Service
- National Oceanic and Atmospheric Administration
- City and County of San Francisco

NAVY INSTALLATION RESTORATION PROCESS (IRP)

STEP 1

PRELIMINARY ASSESSEMENT (PA)/SITE INSPECTION (SI)

DISCOVERY AND VERIFICATION OF POTENTIAL HAZARDOUS WASTE SITE

STEP 2

SCOPING PLANNING

PREPARE PLAN TO STUDY THE SITE

STEP 3

REMEDIAL INVESTIGATION (RI)/FEASIBILITY STUDIES (FS)

CONDUCT SITE STUDIES (RI) AND DEVELOP POSSIBLE CLEAN-UP SOLUTIONS

STEP 4

PROPOSED CLEAN-UP PLAN

PROPOSE CLEAN-UP SOLUTION(S) FOR SITE

STEP 5

RECORD OF DECISION

SELECT CLEAN-UP SOLUTION(S) FOR SITE

STEP 6

REMEDIAL DESIGN/REMEDIAL ACTION

DESIGN AND CONSTRUCT THE CLEAN-UP SOLUTION(S)

STEP 7

OPERATION AND MAINTENANCE

MEASURE HOW WELL THE CLEAN-UP SOLUTION(S) PERFORM OVER TIME

Copies of these documents are on file, and can be reviewed at the Information Repository located at:

San Francisco Public Library
Anna E. Waden Branch
5075 Third Street
San Francisco, CA 94124
Telephone (415) 468-1323

A second Information Repository has been established at:

San Francisco Public Library
Main Library
Science and Documents Department
Corner of Larkin and McAllister
San Francisco, CA 94120
Telephone (415) 468-1323

In addition to these studies, the Navy has completed a removal action near the site of former Building 503. The removal action consisted of excavating 1,500 cubic yards of soil contaminated with Polychlorinated Byphenyls (PCBs) from a leaking electrical transformer. The excavated soil was taken to permitted disposal facilities. The Navy is currently planning additional hazardous waste removal actions for later this year to remedy sites where hazardous wastes on the surface represent a potential threat to the public and/or the environment.

The Navy has implemented an aggressive community relations program. An environmental outreach program in the community has included 30 events and over 8,000 people. The Navy has held six Public meetings and issued 12 Information Releases. The Navy is forming a Technical Review Committee which includes representatives from EPA and State and local regulatory agencies as well as a public representative appointed by San Francisco Mayor Art Agnos.

THE ROLE OF THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY IN THE NAVY'S ONGOING INVESTIGATION.

As described on page three, the Navy's Installation Restoration Program has made significant progress in the environmental clean-up at Hunters Point Annex. Prior to finalization, each document listed on the preceding page was sent to the EPA for review and comment.

SIGNIFICANCE OF HUNTERS POINT ANNEX ON NATIONAL PRIORITIES LIST

Placement of Hunters Point Annex on the National Priorities List will have a number of impacts on the future of the environmental clean-up effort by the Navy. The Navy believes that these impacts will be favorable for two major reasons.

First, inclusion on the National Priorities List will facilitate future funding for the clean-up from the Defense Environmental Restoration Account (DERA). The DERA account must fund all Department of Defense clean-ups across the country. Priority uses of this fund must go to those sites on the National Priorities List. A high degree of public interest has been expressed in the timely clean-up of Hunters Point Annex by the public and elected officials at the local, state and federal level. Inclusion on the National Priorities List will best facilitate the timely action the Navy also desires to take.

Finally, there has been some concern expressed in public discussions that the environmental clean-up of Hunters Point Annex was tied to the successful Homeporting of the USS Missouri at Hunters Point Annex. Now that the Missouri Homeporting has been canceled by the Base Realignment and Closure Commission, as ratified by the United States Congress, inclusion on the National Priorities List will provide assurance to the community that Hunters Point Annex will be cleaned up regardless of the Homeporting decision. Under provisions of the federal "Superfund" law, the Navy will be required to enter into an Interagency Agreement with the EPA, and if the State so desires with the State of California specifying the timely clean-up of Hunters Point Annex to the satisfaction of the EPA, State of California and the community at large.

WHAT IS AN INTERAGENCY AGREEMENT?

One of the requirements of the "Superfund" law is for federal facilities such as Hunters Point Annex to enter into an interagency agreement. This agreement is expected to be entered into with the EPA and State of California. This agreement establishes the framework of what role each party will play in the clean-up, and establishes dates by which major milestones, e.g. completion of remedial design and start of remedial action, must begin. One of the key features of an interagency agreement is its enforceability. Once signed, the terms of this agreement are enforceable by the parties, and subject to the citizen suit provision of the federal "Superfund law." It is anticipated that the Interagency Agreement for Hunters Point Annex will be signed in early 1990.

AVAILABILITY OF TECHNICAL ASSISTANCE GRANTS.

The Environmental Protection Agency has begun a new community relations activity - Technical Assistance Grants (TAG) program. The purpose of the TAG program is to assist community groups in interpreting technical information. Under this program, one eligible community group at Hunters Point Annex may obtain a grant of up to \$50,000 in Federal funds to obtain technical assistance in understanding site documents. To be eligible, a group must:

- o Be incorporated
- o Meet a 35% matching fund requirement which may be in-kind contributions from the group
- o Meet certain financial and administrative requirements
- o Prepare a plan to use the technical assistance based on EPA's technical work schedule.

For more information about TAGs please contact Jack Lockwood, TAG coordinator, at (415) 974-7730.

THE CONTINUING ROLE OF THE STATE OF CALIFORNIA: A LETTER FROM THE REGIONAL DIRECTOR OF THE TOXIC SUBSTANCES CONTROL DIVISION, CALIFORNIA DEPARTMENT OF HEALTH SERVICES.

The State of California has been deeply involved in the continuing environmental clean-up of Hunters Point Annex since December 1987, and has closely monitored the Navy's Installation Restoration Program. The proposed listing of Hunters Point Annex on the National Priorities List raises many questions about the current and future involvement of the State of California in the environmental clean-up. To address this question, the Navy asked Mr. Howard Hatayama, Regional Director of the Toxics Substances Control Division for the California Department of Health Services, to comment on this question. His letter is included after page seven.

WHERE TO GO FOR QUESTIONS?

While this Information Release attempts to answer the questions raised by the proposed National Priorities List action, others will undoubtedly arise. Therefore, we are including a list of contacts for the environmental clean-up at Hunters Point Annex.

United States Navy:

Project Engineer: Mr. Kam Tung (415) 822-3113
 Community Relations: Mr. Randal Friedman (415) 765-5613

California Department of Health Services:

Project Manager: Mr. Mark Malinowski (415) 540-3401
 Community Relations: Ms. Shirley Buford (415) 540-3401

United States Environmental Protection Agency

Federal Facilities Coordinator: Ms. Julie Anderson (415) 974-8910
 Community Relations: Ms. Dorothy Wilson (415) 974-0255

WILL REMOVAL ACTIONS PROPOSED BY THE NAVY BE AFFECTED?

The Navy has proposed, and is developing work plans for hazardous waste removal actions at the Tank Farm, Building 521 Power Plant, Pickling and Plate Yard and Tank S-505. Draft action memoranda have already been completed and submitted to regulatory agencies. Correspondence from the California Department of Health Services has supported the Navy's efforts to undertake these removal actions. The proposed listing of Hunters Point Annex on the National Priorities List does not mitigate the continuing potential threat to public health and/or the environment from these sites (see next section). Therefore, the Navy will continue in the planning and implementation of these four removal actions.

The Navy held a public meeting, and has received written comments on these proposed removal actions. These written and oral comments are being reviewed, and appropriate changes in the work plans are being implemented. A complete Responsiveness Summary will be prepared and placed in the Information Repository before any final action is taken.

A QUESTION FROM THE COMMUNITY: "WHY IS THE NAVY PLACING SUCH EMPHASIS ON THE FOUR REMOVAL ACTIONS AND NOT THE IMMEDIATE CLEAN-UP OF SITES LOCATED ON THE SHORELINE?"

In public discussion of removal actions proposed for Tank S-505, the Pickling and Plate Yard, the Tank Farm and Building 521; the question has been asked, "Why not start with the sites located on the shoreline of San Francisco Bay such as the Landfill and Bayfill?"

This question is answered through the characteristics of the sites. The Landfill and Bayfill total approximately 80 acres. While we know that these sites contain hazardous wastes, we don't know exactly where these hazardous wastes are. Also, the wastes are not evenly spread throughout the sites. Since the wastes are underground, the only way to locate and accurately identify the types of hazards is to do extensive subsurface testing and analysis. For example, the tests on the Landfill will include 64 borings, 18 wells, four trenches, five geophysical profiles, 90 water samples, and 532 soil samples just to locate and identify them. These tests will take a great deal of time but must be completed before the Navy can propose a method of cleanup.

The four sites chosen for removal actions are entirely different from the Landfill and Bayfill sites. Hazardous wastes at the Pickling and Plate Yard are in a small area and mostly on the surface. The Tank Farm, Tank S-505 and Building 521 are similar in their characteristics.

Since the wastes at these sites are mostly on the surface, they are exposed to the weather. These wastes are subject to high winds, winter storms and sunlight. This means that these wastes

are a greater threat to the people working at Hunters Point and the environment than other sites.

Also, preparation of the remedial plans for the Bayfill and Landfill sites will take several years while the plans for removal of the waste at the other sites will take only a few months. All of these factors have led the Navy to favor the immediate clean-up of the four removal action sites, while continuing the planning for the shoreline sites.

SITE HISTORY

Hunters Point Annex (formerly known as Hunters Point Naval Shipyard) was an active Naval Shipyard from 1941 until 1974 when it was placed in industrial reserve. In 1976, a major portion of the facility was leased to Triple A Machine Shop, which utilized the shipyard for commercial and Navy ship repair until late 1986. Currently, the Annex is under U.S. Navy administration.

ADDITIONAL INFORMATION

Copies of all documents and correspondence relating to the environmental clean-up are on file, and can be reviewed at the Information Repository located at:

San Francisco Public Library
Anna E. Waden Branch
5075 Third Street
San Francisco, CA 94124
Telephone (415) 468-1323

A second Information Repository has been established at:

San Francisco Public Library
Main Library
Science and Documents Department
Corner of Larkin and McAllister
San Francisco, CA 94120
Telephone (415) 468-1323

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704

July 10, 1989

Commander, Naval Base San Francisco
Building 1, Treasure Island
San Francisco, CA 94130-5018

Dear Commander:

This letter is in response to your request for our comment on the proposed placement of the Hunters Point Annex on the National Priorities List.

As you know, the U.S. Environmental Protection Agency (EPA) has announced that the Hunters Point Annex will be proposed for placement on the National Priorities List. As a result, the Hunters Point Annex will become one of over 100 sites in California which have been either placed or proposed for placement on the National Priorities List. We do not expect this development to change either the direction or the pace of the investigation and remediation of the Hunters Point Annex.

Since December, 1987, the Navy has been investigating and remediating the Hunters Point Annex in accordance with a Remedial Action Order issued by the California Department of Health Services (Department). This order will continue to remain in effect.

The proposed listing of the Hunters Point Annex will, however, result in two additional requirements. First, the Navy will have to enter into an interagency agreement with EPA. Second, EPA will have to formally approve and sign future record of decisions. To ensure that these two additional requirements do not conflict with the requirements of the Department, we anticipate participating in interagency negotiations with the Navy and EPA. In addition, we expect both the Navy and EPA to closely coordinate their activities with the Department.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Ric Nishi for".

Howard K. Hatayama, Chief
Region 2
Toxic Substances Control Division

HKH:RN:krf