



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION IX
215 Fremont Street
San Francisco, CA 94105

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November 9, 1989

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

Dear Mr. Tung:

EPA's comments on the revised "Workplan for the Field Treatment Demonstration and Removal of Metal-Contaminated Sandblasting Grit" at Hunters Point are as follows.

1). The only two metals for which extraction tests (WET and EP Tox) have been run are lead and copper. Table A-1 shows, however, that several other metals were detected at levels which could theoretically exceed EP Tox levels, specifically arsenic, barium, and chromium. Although the extractable levels may indeed turn out to be well below regulatory levels, we believe this needs to be confirmed by running an extraction test for these three metals.

Since the Chemical Analysis Plan (Section 5, page 12 of the Workplan) states that four samples of the untreated grit will be analyzed for WET Pb and Cu during the first analysis of the demonstration, we propose that the same samples be analyzed for WET As, Ba and Cr. If the WET tests do not indicate an exceedence of regulatory levels, no further analysis would be needed. If WET levels are exceeded, however, EPA Tox analysis should also be done to determine whether or not EPA Tox levels of these three metals are exceeded. Should they prove to be EP Toxic, we should be notified immediately to discuss implications of this finding. At a minimum, positive results would necessitate testing of the treated samples for these metals to confirm successful treatment.

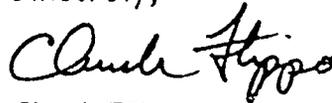
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2) In the response to DHS's comments on the draft Workplan (attached to the October 25, 1989 letter from L. A. Michlin to Howard Hatayama), reference is made in the response to comment #10 to a new "restricted area." We would like further clarification as to what this means. Will this area be fenced, taped off, or posted for restricted entry? Who will have access? How will access be controlled? What, if any, protective equipment will be required in this area?

We feel these comments should not cause any delay in the project, since we assume you will be able to incorporate the additional analyses into the WET analyses already planned. Formal revision of the Workplan is not necessary, provided we have at least a letter response indicating how you plan to address Comment #1 above. Although we do not need a written response prior to start-up of the project, any issues you have concerning the additional analyses should be resolved before the WET Pb/Cu analyses of the four untreated samples takes place.

If you wish to discuss these matters further, please call me at 865-7630.

Sincerely,



Chuck Flippo
Federal Enforcement Section

cc: Louise Lew, WESDIV
Mark Malinowsky, DHS
Scott Lutz, BAAQMD