

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM

711 HUNTERS POINT AVENUE, BLDG. F, STE. 200

SUNNYVALE, CA 94710

(415) 540-3724

December 18, 1990



Commanding Officer
Naval Station Treasure Island
Building I (Code 84)
San Francisco, CA 94130-5000

Attn: Mr. Eddie Sarmiento

Dear Mr. Sarmiento,

**DHS ACTION ITEMS - DRAFT PRELIMINARY ASSESSMENT, OTHER AREAS/
UTILITIES - HUNTERS POINT ANNEX**

At the project manager meeting on December 14, 1990 the Preliminary Assessment (PA), Other Areas/Utilities for Hunters Point Annex was an item of discussion. The Department of Health Services (Department) expressed concern regarding the approach used to evaluate sites and the recommendation of "No Further Action" at several buildings.

The following PA Action Items were identified by the Department:

The Department agreed to meet with the EPA and Regional Water Quality Control Board in early January, 1991 to further discuss the PA investigative approach and recommendations.

The Department and EPA will submit written comments on the PA to the Navy by January 15, 1991. The Navy will have 45 days to respond to all PA comments.

If you have any questions regarding these comments, please contact me at (415) 540-3816.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark Malinowski".

Mark Malinowski
Engineering Geologist
Region 2
Toxic Substances Control Program

Enclosure

cc: See attached list

Commanding Officer
Naval Station Treasure Island
Attn: Mr. Eddie Sarmiento
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Mailing List

cc: Richard Powell
Western Division
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EPA - Region 9
Chuck Flippo (H-7-5)
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San Francisco, CA 94105

Tom Gandesbery
San Francisco Regional Water
Quality Control Board
1800 Harrison St., Suite 700
Oakland, CA 94612

DHS Comments
Preliminary Assessment Other Areas/Utilities
Hunters Point Annex, October 19, 1990

General Comment:

It is unclear on how the objectives and technical approach will be integrated to deal with the alleged illegal dumping by Triple A Machine Shop. Lack of documentation and no analytical data (Site Evaluation) does not mean the site can be considered clean. Triple A may have used the area for improper disposal of hazardous materials. The Department would like to further discuss this issue with the Navy, EPA and any other interested regulatory agency.

Specific Comments:

<u>Pg</u>	<u>Sec</u>	<u>Pgph</u>	<u>Line</u>	<u>Comment</u>
2	1.2	1		First Bullet. Replace the word operable unit with "sites".
3	1.3	1		Second Bullet. Replace the word operable unit with "sites".
4	1.4	5		<u>Step IV: Site Evaluation</u> The last sentence states that areas where no analytical data was evident were recommended for no further action. Lack of analytical data should not be a sole justification for not investigating an area.
5	1.4	1	2	Typo; ...grouped into sites <u>or</u> the basis...
12	3.2	3	2	Reference Plate 2, instead of "..the 1971 drawing....
13	3.2.1.2	1		Building 124 is not identified on the Plates. Specify building 124 and the tank locations as being between buildings 128 and 130.
16	3.2.4	1	1	Edit; ...oil-containing electrical <u>PA</u> equipment
18	3.2.4.1	1	2	Indicate if any visible signs of oil spillage found near transformer P-529.
19	3.2.4.1	1	1	Edit; ...were presumed to <u>which</u> contained ...
21	3.3.1	1	4	Edit; ...are identified for evaluating <u>of</u> groundwater quality. Explain why groundwater quality criteria are not identified.

<u>Pg</u>	<u>Sec</u>	<u>Pgph</u>	<u>Line</u>	<u>Comment</u>
23	3.3.1.3	1	1	Specify that "the acceptable upper concentration limit" are RWQCB numbers and do not represent health based risk assessment levels.
24	3.3.2.1	3		Building 126. Should this be building 128?
26	3.3.2.1	1	1	Building 704. Typo; ...borings (ADE-17, ADE-20,... correct the "E" to "4". Line 4 boring <u>AD4-2</u> should be AE4-2.
		4	4	Building 707. Typo; boring <u>AE4-2</u> should be AE4-1. Line 6, boring <u>AE4-3</u> should be AD4-3.
28	3.3.2.2			Building 156 is identified as a Rubber Shop in the Building List. Provide further information on the activities at building 156 and the Rubber Shop Annex (Bldg 163). Benzene was a common solvent for use with rubber products. Future sampling at this site should include sampling for VOCs. New information may necessitate including building 156/163 in Table 4.
29	3.3.2.2	1	5	Appendix G does not contain the SOC results.
33	3.3.2.5	1	3	Present the WET results for boring SP-5.
43	4.3	1		What methods will be employed to further identify the locations of chemical and/or acid/electrolyte supply lines?
40	4.1.2	1	10	DHS believes that the lower (closest areas to the S.F. Bay) sections of Drainage Areas C and D should also be included as having a high potential for contamination. The lower section of C captures drainage from the battery and electric shops, as identified in Table 11 and from the submarine drydock activities. The lower section of D captures drainage from not only the tank farm and building 101, as identified in Table 11, but also buildings 156 - Rubber shop (possible benzene), 134 - Machine Shop, (metals, oils, solvents) and building 124 - (acid and electrolytic tanks.
55	6.3.2	1		A soil gas survey should be evaluated as a first step prior to soil sampling.

<u>Pg</u>	<u>Sec</u>	<u>Pgph</u>	<u>Line</u>	<u>Comment</u>
55	6.4	1	1	Edit; ...which contained former_99 PCB-containing.... Line 3, will the SI site visit include sampling, or is the visit only visual confirmation?
	Table 4.			Add notes 1 & 2 to each page. Pg 2 of 4, Explain what is meant by Side Reach. Should it be Reach 2?
	Plate 2.			Identify Building 810 as IR-21
	Appendix G.			Include SOC analyses.