

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**  
700 HEINZ AVENUE, SUITE 200  
BERKELEY, CALIFORNIA 94710  
(510) 540-3724

N00217.002521  
HUNTERS POINT  
SSIC NO. 5090.3



January 28, 1992

Commanding Officer  
Attn: Mr. Eddie Sarmiento  
Naval Station Treasure Island  
Building 1 (Code 84)  
San Francisco, California 94130-5000

Dear Mr. Sarmiento:

**HUNTERS POINT ANNEX - COMMENTS ON THE "DRAFT FINAL SITE  
INSPECTIONS: SITES PA-16 AND PA-18 AND RI WORK PLAN: SITE PA-18"**

The Department has reviewed the "DRAFT FINAL SITE  
INSPECTIONS: SITES PA-16 AND PA-18 AND RI WORK PLAN: SITE PA-18"  
report for the Hunters Point Annex. The report is accepted with  
the following qualifications:

- 1) It is mentioned several times throughout the response to comments that the PA-16 Site will be revisited after the completion of the ESAP, further RI investigations for nearby IR Sites and the completion of the Background Report. Please provide a schedule to ensure that PA-16 is adequately addressed following the completion of the above mentioned auxiliary documents.
- 2) The proposed schedule for PA 18 (Plate 8) is unacceptable. 15 weeks for laboratory analysis and 17 weeks for RI report preparation are excessive time estimates for fieldwork of this scale. Please revise and resubmit.
- 3) The Navy shall investigate all Sites based on the necessity to fully define the nature and extent of contamination existing at each of the Sites. Applicable standards for evaluating investigative levels of chemical concentrations in soil and groundwater shall be based on health based levels from a risk analysis. The Department will not provide guidelines for investigative levels.
- 4) Well screen lengths shall generally be within 10 to 15 feet long. As previously agreed, any proposed screen length over 10 feet must have prior Department approval (22 February 1991 letter from the Navy to the Department regarding the

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Draft Sampling Plan). In general, any well with a screen length greater than 15 feet will be regarded as a preliminary investigative monitoring well.

I can be reached at (510) 540-3816 if you have any questions.

Sincerely,



Bonnie Arthur  
Associate Hazardous Materials  
Specialist  
Site Mitigation Branch  
Region 2

cc: Ms. Louise T. Lew, (Code 1811)  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, California 94066-0720

Ms. Roberta Blank, (H-7-5)  
Remediation Project Manager  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105

Ms. Barbara Smith  
San Francisco Bay  
Regional Water Quality Control Board  
2101 Webster Street, Suite 500  
Oakland, California 94612