



April 22, 1993

To: DISTRIBUTION

Subject: NAVAL STATION TREASURE ISLAND, HUNTERS POINT ANNEX

Encl: (1) Navy Responses to Supplemental DTSC Comments on the Draft Operable Unit II, Feasibility Study, Naval Station Treasure Island, Hunters Point Annex, San Francisco, California, dated April 22, 1993

On behalf of the Navy, we are forwarding for your review and comments enclosure 1 which is delivered in accordance with the Naval Station Treasure Island, Hunters Point Annex Federal Facility Agreement.

Should you have any questions regarding these matters, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Wing Wong, Code 1811WW, (415) 244-2537).

Submit written comments, if any, to Commanding Officer (Attn: Jim Sullivan, Naval Station Treasure Island, Bldg. 1 (Code 84), San Francisco, CA 94130), with a copy to Western Division, Naval Facilities Engineering Command (Attn: Henry C. Gee, Code 1811HG), 900 Commodore Drive, San Bruno, CA 94066-2402.

Very truly yours,

Gary Welshans, Sc.D., P.E.
Program Manager

GW:kk

Enclosures

DISTRIBUTION:

U.S. Environmental Protection Agency (Attn: Roberta Blank) (w/2 cys of encl)
California Department of Toxic Substances Control (Attn: Cyrus Shabahari) (w/2 cys of encl)
California Regional Water Quality Control Board (Attn: Dr. Barbara M. Smith)

Encl: (1) Navy Responses to Supplemental DTSC Comments on the Draft Operable Unit II, Feasibility Study, Naval Station Treasure Island, Hunters Point Annex, San Francisco, California, dated April 22, 1993

Copies to:

National Oceanic and Atmospheric Administration (Attn: Denise Klimas)
U. S. Department of Interior (Attn: William Allen)
U.S. Fish & Wildlife Service (Attn: Steve Schwarzbach)
Agency for Toxic Substances and Disease Registry (Attn: Joan Davis)
California Department of Fish and Game (Attn: Mike Rugg)
Bay Area Air Quality Management District (Attn: Catherine Fortney)
Bay Conservation and Development Commission (Attn: Nancy Wakeman)
City and County of San Francisco (Attn: David Wells)
San Francisco District Attorney (Attn: Steve Castleman)
TAG Recipient (Attn: Sy Allen Browning)
NAVSTA Treasure Island (Attn: Jim Sullivan) (w/2 cys of encl)
COMNAVBASE S.F. (Attn: Randy Friedman)

WESTDIV (Attn: Wing Wong) (12 copies)

**NAVY RESPONSES TO SUPPLEMENTAL DTSC COMMENTS
ON THE DRAFT OPERABLE UNIT II FEASIBILITY STUDY
NAVAL STATION TREASURE ISLAND
HUNTERS POINT ANNEX
SAN FRANCISCO, CALIFORNIA**

April 23, 1993

NAVY RESPONSES TO SUPPLEMENTAL DTSC COMMENTS

The following are the Navy's responses to the comments of the Department of Toxic Substances Control (DTSC) on the *Navy Responses to Agency Comments, Draft Operable Unit II Feasibility Study, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California*, transmitted with the DTSC letter dated February 11, 1993. The DTSC's comments are reproduced here exactly as in the original documents.

DTSC COMMENTS AND NAVY RESPONSES

General Comments

Comment: The Department has reviewed the "Navy Responses to Regulatory Agency Comments on the Draft Feasibility Study (FS) Report, Operable Unit (OU) II", which was received on January 14, 1993. The Department has the following comments to the Navy's response to Comment #4 regarding groundwater discharge to the San Francisco Publicly Owned Treatment Works (POTW):

- 1) The Table of effluent concentrations provided on Page 2 should be replaced by concentrations contained in Table 6 of the OU II FS (attached).

Response: The following table shows the chemicals of concern in groundwater at Sites IR-6, IR-9, and IR-10, their maximum concentrations, and the corresponding acceptance limits at the POTW. For those chemicals for which no acceptance levels are promulgated in City and County of San Francisco Ordinance No. 19-92 or Order No. 158170, the POTW dictates Soluble Threshold Limit Concentration (STLC) values listed in California Code of Regulations, Title 22, Section 66261.24 to be used as acceptance levels. The chemicals for which no criteria are posted in the above referenced documents are not regulated by the POTW.

Chemicals of Concern	Maximum Concentration (mg/l)	POTW Acceptance Levels (mg/l)	Source
<u>Site IR-9</u>			
Total cPAHs	0.00089	--	NA
Chromium VI	0.460	5	Order 158170
<u>Site IR-6/IR-10</u>			
Benzene	0.072	--	NA
Chromium VI	0.400	5	Order 158170

Chemicals of Concern	Maximum Concentration (mg/l)	POTW Acceptance Levels (mg/l)	Source
Site IR-6/IR-10 (continued)			
1,2-Dichloroethene (total)	0.140	--	NA
2-Methylnaphthalene	0.240	--	NA
Naphthalene	1.800	--	NA
Phenanthrene	0.160	--	NA
Trichloroethene	0.038	204	Title 22
Vinyl Chloride	0.038	--	NA

-- Chemical not regulated by POTW.

NA Not applicable.

2) The Department may agree that treatment at the POTW is acceptable as a short-term solution, however, there are some other issues which should be addressed as the Navy plans for long-term solutions:

- Some of the wells may have concentrations which exhibit hazardous waste characteristics, therefore, blending the effluent from all wells may then be categorized as treatment.
- The National Contingency Plan evaluation criteria for screening groundwater cleanup alternatives include 1) long term effectiveness and permanence and 2) reduction of toxicity, mobility and volume through treatment. For example, pumping and piping groundwater to the POTW may not meet these criteria since this alternative is contingent upon standards and capacity at the POTW remaining the same. Additionally, a substantial portion of chlorinated hydrocarbons are merely volatilized, not "treated" at the sewer collection system or at the plant. This form of treatment may need to be evaluated in the site risk assessment.
- The Navy will have to obtain prior approval from the POTW before discharging contaminated groundwater to the sewer.

Response: The hazardous waste characteristics of toxicity, corrosivity, ignitability, and reactivity are not likely to be displayed for the low concentrations of chemicals detected in groundwater at these sites. In addition, it is not necessary to blend the effluent prior to discharge; separate storage tanks could be utilized. Thus, discharge from a well or wells exhibiting hazardous waste characteristics could be segregated from the other discharge and treated or disposed separately. The need for such segregation would be further defined during the design of the system.

Because some of the estimated groundwater cleanup times are long, and because parcel-based studies have not been completed which address interim ambient chemicals, underground utilities and other potential contamination sources to the groundwater, the alternative of pumping and piping groundwater to the POTW is considered as an early action to gain hydraulic control of contaminated areas. The long-term applicability of this measure will be assessed during preparation of the parcel-based or facility-wide RI/FS.

Reduction of toxicity would be addressed under this alternative since the POTW treats water before discharge under an NPDES permit. The reduction of mobility and volume of chemical-bearing groundwater would occur through implementation of hydraulic controls and discharge as proposed.

The low concentrations of chemicals detected in the groundwater are not expected to impact treatment at the POTW. Treatment at the POTW is operated under the supervision and permitting authority of the Bay Area Air Quality Management District (BAAQMD). Health and safety procedures and pollution control systems in place at the plant are expected to be sufficient to protect workers at the plant.

The Navy will obtain prior approval from the POTW before discharge of groundwater commences. The batch discharge permitting process has already been investigated by the Navy and has been used for discharge of water generated during aquifer testing.