



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

N00217.002696
HUNTERS POINT
SSIC NO. 5090.3

75 Hawthorne Street

San Francisco, Ca. 94105-3901

July 9, 1993

Subject: Additional Parcel A Comments

From: Roberta Blank, RPM *RBlank*

To: Bill Radzevich, WestDiv

Attached is a set of comments from our Regional Toxicologist, Daniel Stralka, which should be added to our 7/7/93 comments to Raymond Ramos, regarding the preliminary data review for Parcel A. Please call myself at (415) 744-2385 or Mr. Stralka at (415) 744-2310 if you have any questions regarding these comments.

cc: Barbara Smith, RWQCB
Cyrus Shabahari, DTSC
Jim Sullivan, NSTI
Gary Welshans, PRC
Raymond Ramos, WestDiv

MEMORANDUM

To: Roberta Blank (H-7-5)
Remedial Project Manager

From: Daniel Stralka, Ph.D. (H-9-3) 
Regional Toxicologist

Subject: Comments on Hunter's Point Parcel A data presentation from June 10, 1993

Date: July 8, 1993

After reviewing this document, I would like to commend PRC for using total risk to determine the possible hazards at parcel A Hunter's Point. This approach should streamline the process by reducing uncertainties about the basis of the conclusions. Additionally, the use of the highest detected concentration with data sets of limited size or great variability was appropriately applied as stated in Superfund guidance. Once total risk is determined, then elevated risks need to be evaluated by source, i.e. site related or background. The presentation is not clear as to the method which background was determined. After talking with Xuanna, I discovered that she used her professional judgement to determine what appeared to be background based on the data set. Where as background has not been determined for HPA, this could be appropriate for a screening process. However, I believe that there were specific samples collected in parcel A during the field investigation to determine background. These should be used, on a limited basis, to evaluate the background metals concentration for the soil type within Parcel A. These values would not be appropriate for the background on the rest of the base. Xuanna is checking on these measurements and will evaluate their impact on PRC's recommendations for exclusion of several of the heavy metals in parcel A based on background.

It should be pointed out that this evaluation only addresses direct human contact hazards and does not address any ecological or ground water impacts, both areas which could alter the final clean-up levels.

Summary tables for the chemicals detected should present the toxicity values used in the evaluation. This will be of particular concern for the State since they do not agree with all the values presented on IRIS and Heast.

Maps of the sampling points should illustrate the extent of contamination. This could be easily done by showing concentration isopleths. This would be helpful in demonstrating area of contamination and would better define the area to be used in the exposure areas for the risk assessment. The current calculations include all measurements in the geographical site definition which may not be consistent with the area of contamination. This would have the effect of including clean areas into the average chemical concentration calculation. The current data should be spatially analyzed to determine the area of contamination and insure that large numbers of non-detect data are not being included in the determination of exposure point concentration.

Preliminary assessment of the conclusions at site 19 are appropriate for the organics but the evaluation of background for the carcinogens arsenic and beryllium and the systemic toxicants, nickel, manganese and vanadium need to be addressed.

I concur with the site 43 conclusion of directing remediation to the arsenic and lead in soil which will also address the PAH contamination . However, only the direct contact human health pathways are being assessed. This is of particular concern for the herbicides MCPP and MCPA which are not potent mammalian toxicants but could have other significant effects.

Site 41 appears to have localized contamination in the drum storage area which could be remediation easily. However, levels of nickel, arsenic, and lead are of concern and need to be compared to background.

Overall, the background determination should be resolved soon and the determination of other receptors needs to be finalized to complete the remediation of parcel A.

If you have any questions regarding my comments, I can be reached at (415) 744-2310.