



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

December 29, 1993

Mr. Mike McClelland
Remedial Project Manager
Mail Code: T4A1MM
Western Division
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402

Dear Mr. ^{Mike} McClelland:

We have reviewed the materials which were handed out at the October 12, 1993 meeting on the underground utilities Site Inspection data presentation for Parcels B and C at Hunters Point Annex (Volume I). We are providing the attached comments to supplement our verbal comments and input provided to you at the meeting.

We appreciate your full consideration of these comments in your preparation of the final Site Inspection reports for the parcels and the final work plan for the upcoming Remedial Investigation phase of work for these parcels. (We have just received a copy of your proposed RI workplan dated December 17, 1993 for Parcels B and C and will be providing comments on it soon.) Should you have questions, you may contact me at (415) 744-2366.

Sincerely,

A handwritten signature in cursive script, appearing to read "Raymond Seid".

RAYMOND SEID
Remedial Project Manager
Federal Facilities Cleanup Program

attachment

cc: Cyrus Shabahari, DTSC
Barbara Smith, RWQCB
Amy Brownell, SFDPH
Ray Ramos, BEC, NAVFAC WESTDIV

ATTACHMENT

COMMENTS ON PARCELS B and C SITE INSPECTION DATA PRESENTATION,
VOLUME I (UNDERGROUND UTILITIES)

1. The PA Site Inspection Flow Chart is confusing and needs further clarification about the process flow itself. SI work versus RI work are not clearly delineated. Specify in the "No further investigation is required" block that "no RI investigation is required". (The word "further" is deleted because the initial investigative phase was performed as a SI, not as a RI.) Also specify in a footnote that this does not necessarily preclude any actual cleanup work which may be required based on the SI findings. Likewise, specify in the "Perform additional investigation" block that a RI type of investigation will be performed. This comment is based on the basic assumption that Site Inspection type of investigation was performed on a one-time basis and that it is actually a matter of semantics to define any subsequent investigative work to be RI investigations. Please make the necessary clarifying changes and confirm our interpretation of the flow chart.
2. In the PA Site Inspection Flow Chart, clearly explain what is meant by the question in the following decision block: "Are there enough data to characterize the site for an RI and are data adequate for the PHEE and FS?". Specifically, in what context is the term "characterize" being used? (If the answer is "yes", then the data must first be reliable and second it must characterize the full extent of the contamination since "no additional investigation is required".) Perhaps a short explanatory footnote is needed here.
3. In the PA Site Inspection Flow Chart, explain specifically what does the block "Perform Parcel RI/FS" actually mean. If "no RI investigation is required" in the previous block, then the "Perform Parcel RI/FS" block must mean performing the cleanup action.
4. In the PA Site Inspection Flow Chart, clarify that although releases which are not concluded to be point sources (i.e., areawide contamination) will not be fully characterized under the RI work phase, the data procured under SI work will nevertheless be factored into the overall final remedy which is protective for a specific site.

5. We envision the data quality objective of the PA/SI process is to procure the level of data which can be used to decide whether contamination at a site is potentially serious enough to require additional investigation and/or cleanup action under the RI/FS work phase. Unless the data for a site can reliably show non-detectable contaminant levels, we do not expect to close out a site outright in the PA/SI process without additional considerations. In question is the IALs established for inorganics; sites which are "closed out" because inorganics were below IALs may have to be re-evaluated when consensus background levels are ultimately established (i.e., background levels for some inorganics may indeed be lower than the IALs). Likewise, HBLs and MCLs used alone as the basis for closing out a site may not be sufficient because an overall risk assessment has yet to be performed for the site to determine if all the residual contaminants taken collectively pose unacceptable risks to human health and the environment. Until these elements can be satisfactorily addressed in the PA/SI phase for those sites (to the extent that they can be addressed at that point), we anticipate the sites to move on to the RI/FS phase where sound "close out" decisions can be made.
6. In the "Key to Health Risk Notation System" page, a rationale needs to be added to explain why contaminant data procured from waters of sanitary sewer lines, steam lines, and storm drainage lines are not compared to HBLs or IALs.
7. Independent calculation of risk- or health-based levels for the child is unconventional. The Navy's approach assumes that the resident child lives in the impacted area only 6 years. Conventionally, risk is based on an exposure duration of 30 to 70 years. This period may be broken down to an early childhood segment (0 to 6 years) and an adult segment (7 to 30 or 70 years). Intake rates and averaging times appropriate to each age segment are summed up and used to calculate risk/hazard over the entire duration of exposure (i.e., 30 or 70 years). Very young children ingest more soil than older children and adults. To account for this, the larger childhood ingestion rate is factored into the calculation of overall risk to the individual. The Navy should eliminate the use of health-based levels which are based on early childhood exposure alone.
8. The Navy should consider using a more balanced, more economical overall investigative strategy. By using quick and less costly field measurement methods in some cases, a more representative characterization of the nature and extent of the contaminants can be achieved for the same

budget because more sampling points can be realized at the lower unit cost. The more expensive Level IV type of data can be procured later when such data are required for making final remedy decisions and risk assessments.

9. In cases where Total Petroleum Hydrocarbons and hydrocarbon constituents are detected in soil and ground water, the Navy's ultimate response action should be consistent with EPA's release response requirements for underground storage tanks and more specifically, the State of California's Leaking Underground Fuel Tank manual. For example, Soil Sample #PA49TA11 from a test pit indicates "TPH-Ttl Recv 1500 J5/R" however, no further investigation is recommended because it was determined that there were no point source. Is this consistent with the requirements?
10. Although it is acknowledged that some elements in the proposed work plan are inherently general in description, some brief details should nevertheless be provided to document the rationale for some work items. Particularly, a brief rationale for the number and locational placement of the monitoring wells and soil borings should accompany those types of work plan items.
11. In the proposed workplans, the header entitled "Field Screening/Lab Analyses" is misleading because it appears that all analysis will be done in a laboratory and no field screening is planned. (Any field screening methods which may be used in the future should be described in adequate enough detail to determine data reliability and usability.)
12. For work such as draining steamlines or removing friable asbestos, specify if these types of work will fall under the IR Program or will they fall under routine facilities maintenance or whatever.
13. In the Parcel B Summary of RI Recommendations table, add Building 114 which was an office building. In the Parcel C Summary of RI Recommendations table, add the instrument calibration portion of Building 253 (formerly housing electronics, optical, and ordnance shops) and Building 271 (Paint Shop Annex).
14. Provide specific details on how sediments from the storm drains will be removed, monitored, and disposed of. How will these sediments be analyzed for proper disposal? Particularly noteworthy is the accumulated sediments in the storm drains located in PA-26 in Parcel B. These sediments should be specifically sampled and analyzed because of the nature of past activities in the area and evidence of contaminant releases around the storm drains.

15. Describe how will the existing tidal and flow controls be refurbished and maintained. How will sediments and debris be removed; how will they be analyzed for contaminants and properly disposed of?
16. We recognize that the storm drain system is a direct contaminant exposure pathway to ecological receptors in San Francisco Bay, and as such the Navy should develop and actively implement a basewide preventative and maintenance program to minimize the potential for releases of contaminants through the drain system. This includes monitoring the activities of current tenants as well as routine pumping out of sediment accumulations from the system.
17. A complete description of how the asbestos insulation from the steamlines will be removed is needed. Account for contingencies where it may not be possible or practical to remove asbestos from certain portions of the steamlines. In those cases, describe how these portions will be specifically identified to inform future users of the property that asbestos remains on those steamlines. Also, consider capping the ends of steamlines after effectively draining the lines (including condensate return lines and pump return lines). How will these drained fluids be analyzed and disposed of? Include a rinsing or flushing step to effectively remove any residual contaminants in the steamlines.
18. Specifically regarding the steamlines which were used as a waste oil transport system in Drydock 4, the process of removing the oil from the lines should include a rinsing or and flushing step to effectively remove oil residuals in the lines (including condensate return lines and pump return lines) prior to their abandonment. In addition, consider capping the ends of these lines to discourage future reuse of the lines for oil transport. In the event that oil cannot be effectively removed and rinsed from any portion of the steamlines, those portions should be specifically identified and capped.
19. Rationale should be provided as to why portions of the utilidor on the south side of Drydock 4 were inaccessible for inspection. Describe how these portions will be specifically identified to inform future users that the utilidor portions may contain hazardous materials and contaminants.

20. For the proposed workplan for Drydock 4, provide additional detail on the work planned (e.g., which 400 feet of the utilidor will be removed, criteria for determining the location of the borings, etc.). The Navy should also note that the emphasis on evaluating the extent of contaminants attributed to the utilidors should be at locations where contaminants are most likely to be found (i.e., at locations beneath the utilidors around cracks and seams more so than at locations "adjacent" to the utilidors).
21. A complete description of how the fuel lines will be removed is needed. Include contingencies where portions of the fuel lines may be impossible or impractical to remove. In those cases, describe how these portions will be specifically identified. Also include a step to rinse or flush these lines to remove any residual oils as well as a step to cap the ends of these lines prior to their abandonment. In the event that oil cannot be effectively removed and rinsed from any portion of the fuel lines to be abandoned, those portions should be specifically identified as such.
22. In conjunction with removing the fuel lines, what criteria will be used in determining the extent of removing the "associated contaminated soil"? How will these soils be characterized and properly disposed of? After removing contaminated soils, confirmation sampling should be conducted to verify residuals.
23. Ensure that contaminant data specifically from Test Pits #PA46TA01 and #PA46TA02 for the PA-46 fuel lines are effectively integrated in a timely manner into, and consistent with, the interim action already proposed for the Tank Farm soil and the Parcel B Volume II and III workplan activities proposed in the SI presentation. Likewise, ensure that contaminant data for the PA-49 fuel lines are effectively integrated in a timely manner into, and consistent with, the UST workplan activities and the Parcel C Volume III workplan activities proposed in the SI presentation.
24. For the proposed workplan for the PA-49 fuel lines near Building 203, the hydropunch/boring transect proposed along C Street should be moved slightly to the east.