



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

January 31, 1994 Rec'd 2/9/94  
MEM

T4A1MM JS

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. McClelland: *Mike*

We have reviewed the materials which were handed out at the November 19, 1993 and December 16, 1993 meetings on the underground utilities Site Inspection data presentations for Parcels D and E respectively for Hunters Point Annex (Volume I). We are providing the attached comments to supplement our verbal comments and inputs provided to you at the meetings.

We appreciate your full consideration of these comments in your preparation of the final Site Inspection reports for the parcels and the final work plans for the upcoming Remedial Investigation phase of work for these parcels. Should you have questions, you may contact me at (415) 744-2394.

Sincerely,

**RAYMOND SEID**  
Remedial Project Manager  
Federal Facilities Cleanup Office

attachment

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

## ATTACHMENT

### COMMENTS ON PARCELS D AND E SITE INSPECTION DATA PRESENTATION, VOLUME I (UNDERGROUND UTILITIES)

**NOTE:** The comments on the PA Site Inspection Flow Chart provided to the Navy on December 29, 1993 regarding the Site Inspection Data Presentation for Parcels B and C (Volume I) also apply here.

1. In the "Key to Health Risk Notation System" page, a rationale needs to be added to explain why contaminant data procured for waters of sanitary sewer lines, steam lines, and storm drainage lines are not compared to HBLs or IALs. In addition, provide the rationale as to why storm drain sediments were compared to deep soil HBLs when such sediments are likely to be flushed out into San Francisco Bay thereby posing an all together different exposure scenario.
2. Comments #12, #17, and #18 in our December 29, 1993 comment letter apply to the PA-45 steam lines in Parcels D and E.
3. Comments #21 and #22 in our December 29, 1993 comment letter apply to the PA-47 fuel lines in Parcels D and E.
4. For the 2 monitoring wells proposed for the PA-50 sanitary sewer system in Parcel E near PA50MW05A, reconsider the location of the wells and the positioning of the screens to account for tidal influences in that area.
5. For the several sewer-storm interconnections discovered during the SI for the PA-50 storm drain system in Parcels D and E, ensure prompt notification to the RWQCB and compliance with any applicable discharge requirements.
6. Comments #14, #15, and #16 in our December 29, 1993 comment letter apply to the PA-50 storm drainage system in Parcels D and E.
7. With respect to the recommended actions for the PA-50 storm drainage system (i.e., refurbish and maintain flood control structures and pipelines; monitoring sediment accumulation; complete separation of sewer and storm drains; removing sediments; removing surface sources of sediments; etc.), specify whether such work will be performed under the RI Program, Removal Program, or routine facility O&M.
8. In the Parcel D Summary of RI Recommendations, add the radiation survey and the ecological assessment to the "Parcel-Wide Investigation" header. Also notate that the initial data for PA-16 was unacceptable data which has to be redone for the full sweep of chemicals.