

5090
Ser T4A1WR/L4121
2 Feb 1994

Mr. Raymond Seid
Remedial Project Manager
Federal Facilities Cleanup Program
U. S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA. 94105

Dear Mr. Seid:

This letter is in response to your December 14, 1993 letter regarding Hunters Point Annex (HPA) Parcel-A dispute issues. We believe that several of these issues are close to resolution. This is due to the significant efforts to informally resolve these issues by all parties, including yourself, Mr. Cyrus Shabahari of the State of California Department of Toxic Substances Control (DTSC), and Mr. William Radzevich of the Navy. At this time we don't anticipate that the formal dispute resolution process will be necessary.

We have examined your December 14, 1993 letter regarding HPA Parcel-A dispute issues, and the following is our understanding of the current status of the disputed items:

1. Ground Water for UST S-812

The Navy has agreed to expand the discussion of the results of the ground water sampling events that have occurred in the vicinity of the former location for UST S-812. The ground water at this location has actually been sampled four times on two occasions. The additional details for these sampling activities will be included in the discussion. During August 1991, the Navy detected VOCs, while the CALF-DTSC tested the ground water and did not detect VOCs. In September 1993, the Navy obtained a sample and a duplicate of the ground water from the only borehole to encounter water (of four that were drilled), and VOCs were not detected in either of these samples. We will also provide more detailed information about the test procedures that were used to estimate the detected VOCs in 1991, and the limitations, uncertainties, and levels of confidence that are associated with these procedures. This rationale with additional sampling details should allow this item to be deleted from the dispute.

2. Sampling of Parcel A Groundwater

The regulatory agencies and the Navy have had differing viewpoints on the necessity for sampling and testing the ground water from the upland portion of Parcel-A. In the spirit of cooperation and to expedite the reuse process, the Navy has agreed to sample the ground water at a location near boring No. PA50B011, and to test this ground water for priority pollutants using CLP methods. If the results from these tests confirm the Navy's previous conclusions that contaminants above action levels are not present, the Navy does not expect to perform additional sampling and testing.

The ground water sampling effort and the results of the field investigation are documented in the field variance dated January 20, 1994 which has been transmitted to your office. The preliminary results from the tests conducted on the samples indicate the presence of motor oil constituents in the ground water. Six different oils from the drill rig have been tested for comparison purposes with the contaminant found in the ground water. Since none of the drill rig oils were similar to the

contaminant found in the ground water, it appears that the ground water has been contaminated from a source other than the drill rig or the drilling/sampling equipment. The Navy and our consultants met on January 25, 1994 to discuss a workplan for the contaminated ground water, and because of the results from this discussion and the current pending transfer status of Parcel-A, it is felt that the Remedial Project Managers (RPMs) must work closely together to develop a ground water rationale. To expedite this process, we are proposing a meeting on February 4, 1994 at 9 AM in the PRC office to discuss the ground water issues for Parcel-A.

After a December 15, 1993 field inspection of Parcel-A by the Navy and EPA technical staffs, and consultation with the Navy and EPA RPMs, it was agreed by all parties that sampling of the seeps and springs along the hillside of Parcel-A would not be necessary.

Since ground water samples have been tested and the results will be shared with all parties, we anticipate that this item will no longer be disputed.

3. Ecological Risk Assessment

There seems to have been a misunderstanding between the Navy and the EPA with regard to an ecological risk assessment for Parcel-A. It has been the Navy's position that there is no need to conduct an ecological risk assessment for Parcel-A prior to transfer. We have felt that the data and analysis contained in the Draft Final SI report were adequate to support the conclusion of no significant health or ecological risk, and therefore, we were gratified that the conclusion of the EPA's Draft Ecological Risk Assessment for Parcel-A, dated January 11, 1994, was "there is de minimis risk to terrestrial ecological receptors in Parcel-A." It is our plan that the EPA's final Ecological Risk Assessment for Parcel-A will be included in the HPA administrative record, and we will also incorporate these conclusions into the Navy's response to comments for the Parcel-A Draft Final SI-Report; and with this plan we expect this item will no longer be in dispute.

4. Cleanup Values for Lead

It is our understanding that the EPA has not been convinced by the data and analysis presented in the Parcel-A Draft Final SI report, that the Navy's derivation method for lead values is more technically conservative than the California Leadsread model. It should be noted that the State of California DTSC (November 12, 1993 letter by Jim Polisini) has evaluated the Navy discussion and has determined that the Navy method does not affect the risk assessment because soil with lead concentrations of higher than 250 mg/kg were reduced to 40 mg/kg after investigation by excavation. The Navy will provide the EPA with any requested additional information on the Navy's method, which will facilitate their evaluation. To expedite this process, Mr. James Sickles of PRC has directed their toxicologist to contact Mr. Daniel Stralka of the EPA. These actions should allow this item to be removed from dispute.

5. Storm Sewer Sediments

It is our understanding that the EPA has been concerned because there was not a sufficient quantity of sewer sediments to be sampled during the Parcel-A SI field investigation. The Navy will perform a maintenance cleanout of the storm drains in Parcel-A, and will provide the EPA with a workplan for the monitoring of the storm drains after the cleaning. We will also provide the EPA with a report of these activities, and we expect to transmit the monitoring workplan to you and Mr. Shabahari for review during the second week of February. Based upon this plan of action, we anticipate the deletion of this disputed item.

6. Transfer Decision Document

It is agreed by all parties that this item is not part of the dispute process.

We will continue to coordinate with yourself and Mr. Shabahari, and hope to resolve any other issues with Parcel-A. If there are any additional questions regarding these matters, please notify William Radzevich, at (415) 244-2555.

Original signed by:

RAYMONDE E. RAMOS
BRAC Environmental Coordinator
Hunters Point Annex

Distribution:

California Department of Toxic Substances Control (Attn: Cyrus Shabahari)
California Regional Water Quality Control Board (Attn: Barbara Smith)

Copy to :

Planning Research Corp. (Attn: Gary Welshans)
Harding Lawson Associates (Attn: David Leland)
NAVSTA Treasure Island (Attn: LCDR Virginia Overstreet)
Bay Area Base Transition Coordinator (Attn: CDR Al Elkins)

Blind copy to:

T4A, T4HP, T4C, T4A1
T4A1MM, T4A1DS, T4A1WR
09CJC, 09CMN
Admin Records
Chron, blue, pink, green
File: HPA