



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

N00217.002956
HUNTERS POINT
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San Francisco, Ca. 94105-3901

3/24/94

Mr. Bill McAvoy
Remedial Project Manager
Mail Code: T4A1WM
Western Division
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402

Dear Mr. McAvoy:

The U.S. Environmental Protection Agency has reviewed the Draft Construction Summary Report, Tank Farm Removal Action, dated October 22, 1993 for the Hunters Point Annex Superfund site. Comments, prepared by our representative, Bechtel Environmental Inc., are enclosed.

We appreciate your full consideration of these comments in your preparation of the Draft Final Report. Please call me if you have any questions, at (415) 744-2394.

Sincerely,

for *Roberta Blank*
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

**Comments on the Navy's Draft
Construction Summary Report
Tank Farm Removal Action**

General Comments

A signed certification statement from the site engineer should be provided to verify compliance with the removal action work plan and specifications.

Specific Comments

1. Page 4, Section 1.2, 2nd para.: Reference is made to Table 1 for sample analysis of 10 tanks. It would be helpful if Table 1 included a key to identify which sample number belongs to which tank and whether or not the sample is a composite sample. This is not clear for some of the samples, especially on pages 3 and 4. The Navy should also state reasons, or reference specifications, for the basis on which the chemical parameters and methods were limited to those shown in Table 1.
2. Page 9, Section 4.1, third sentence: "A sample could not be drawn from tank 9...because it was empty...Analytical results...in Table 2." Is sample number 111892-9 on Table 2 from tank number 9 or is it from tank number 10? ND cannot be reported for tank 9 as it was empty. Table 2 should indicated which sample are from which tank. The Navy should also state the reason, or provide a specification reference, for PCB analysis.
3. Page 10, Section 4.3, fourth sentence: "Standing surface water was pumped to the storm drain..." The Navy should state the approximate volume and location of water. Also state how it was determined to be clean and whether pumping to the storm drain was within the permit requirements.
4. Page 11, Section 4.4: The Navy should indicate approximate ranges for depths and widths of each category of trench excavations (deep and shallow excavations). This information could be helpful during future remedial activities.
5. Page 12, Section 4.5, top of page: Summary of the air monitoring data for asbestos in Table 4. Units are not provided for some of the rows in Table 4: Air flow rates and Volume. The Navy should provide these units.
6. Page 17, Section 4.10, bottom of first para.: "...Areas 1,2, and 4 were backfilled and compacted to 90 percent..." Some of the density test results in Appendix I show compaction results below 90 percent; were these areas re-compacted to 90% and retested? Also, did the test frequency comply with the QA/QC requirements specified?

7. Page 20, Section 4.1, top of page: "Rinsate...found to contain over 10,000 ppm, DECON requested sending the rinsate offsite for treatment." Was the request granted and was the rinsate actually sent to offsite treatment? Which treatment facility? What happened with rinsate showing below 10,000 ppm? Why was the rinsate tested for petroleum hydrocarbons only? What about metals? State reasons or reference specifications for the treatment/disposal criteria and revise the report, as necessary.

8. Page 23, Section 6, bottom of page: "The ground surface ...is covered with a 20-mil polypropylene cover." How is the cover anchored and protected against the elements? Are there any regular inspection/maintenance activities scheduled to upkeep the cover integrity? How long is the cover scheduled to function, 2 or 5 years? Who is responsible for future inspection/maintenance, if any? The Navy should revise the report to address these questions.