

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2  
700 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737



August 26, 1994

Mr. Richard Powell  
Mail Code. 09ER1  
Western Division  
Naval Facilities Engineering Command  
900 Commodore Way, Building 101  
San Bruno, California 94066-0720

Dear Mr. Powell:

**HUNTERS POINT ANNEX DRAFT SUMMARY REPORT PHASE I AND PHASE II UST  
REMOVAL AND CLOSURE IN PLACE**

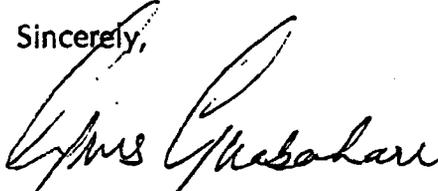
The California Environmental Protection Agency (Cal/EPA) believes that the underground storage tanks (UST) Phase I and II removals and investigation have provided useful information in evaluating the groundwater conditions and identifying hot spots. However, characterizing environmental condition at the UST sites is difficult because, in addressing the site conditions, consistent criteria were not followed.

Furthermore, recent site assessment field work identified presence of additional USTs that have not been included in this report. This information, coupled with the above ground storage tank (AST) investigation, should be compiled in a single report for easy reference and better management of the storage tanks and their contribution to the environmental contamination, if any. As it stands now, there does not seem to be a thorough understanding of all the above ground storage tanks. Further, it is not clear how these tanks are programmed for removals. The Cal/EPA requests that no ASTs be removed until such time that they are accounted for and a mechanism for their removal is identified and agreed upon by the parties.



Should you have any questions regarding this letter and would like to seek clarification, please call me at (510) 540-3821.

Sincerely,



Cyrus Shabahari  
Project Manager  
Office of Military Facilities

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## GENERAL COMMENTS

1. The above report provides no thorough examination of the groundwater beneath the USTs. The groundwater beneath the USTs was not sampled if the removal did not encounter groundwater. We are concerned that the groundwater could be contaminated where soil data indicate presence of contamination. In addition, it is important to explain why contaminants found in the soil do not correspond with the content of USTs at some sites. This is an important component of source identification.
2. Sampling locations need to follow a consistent approach. For example, it is not clear why samples were taken at different locations at a given site. Some samples were taken close to an UST site while in other locations samples were taken 20 or 30 feet away from the UST site. In addition, there was no rationale given as to why it was decided to close in place some tanks and not others. There is no information on how it was determined that tanks closed in place did not leak in to the soil or groundwater. Please explain.
3. Further confusion arises from the investigations scope that seems to vary randomly. For example, there were three samples taken at S-209 but four samples at UST S-210 while S-209 was several times larger in size than S-210. Please explain.

## SPECIFIC COMMENTS

4. Page 18, paragraph 3, please identify the content of the tank.
5. Page 78, although there were no sign of likely release, further investigation is recommended. The statement "verify the lack of any lateral and vertical soil contamination and to establish the extent of any impact on groundwater" is confusing. This criterion has not been followed at other UST sites with similar conditions. Please explain.
6. Page 48, section 3.10.4, please explain why no groundwater grab sample was taken when groundwater was encountered. This was one of the criteria for taking a water sample.

The following comments are forwarded by Regional Water Quality Control Board remedial project manager. Mr. Richard Hiatt may be reached at (510) 286-4359, should you have any questions.

#### GENERAL COMMENTS:

1. The overall scope of this document represents cursory UST investigative data from the removal of forty six (46) USTs and tentative boilerplate descriptions of proposed soil and groundwater investigations to be completed for these sites under the RI.

#### SPECIFIC COMMENTS:

1. 1.1 Purpose, Page 2, First paragraph:
  - a. (first bullet) The purpose of this document as stated is "to identify and remove sources of potential contamination associated with the existing USTs". This report does not document remedial actions. A better description of this report would be to *identify potential soil and groundwater contamination associated with the existing USTs*.
  - b. (second bullet): As stated to "determine the impact of leaking USTs on surrounding soil and groundwater". The areal impact of leaking USTs has yet to be determined. Please consider instead *Determine if USTs had impacted surrounding soil and groundwater*.
2. Section 3.13.7, Page 57, Results for extractables (Page 50) are expressed in parts per billion (micro grams per liter) and puregables (page 60) in parts per million (milligrams per liter). This page was cited only as an example. Please choose one ratio or the other for all of your groundwater data and maintain consistency throughout the body of the report and attached tables.
3. Section 3.13.8, Conclusions and Recommendations, (second sentence) "In addition, analytical results indicate an impact on groundwater." (third sentence) "...and to evaluate the impact, if any, on groundwater." Either groundwater data indicate that it is impacted or that it is not impacted. Please clarify.
4. 3.29.5 Backfill and Site closure,(page 117, second sentence) "Following backfilling with baserock material, the excavation site was recovered with soil. Please indicate the origin of this soil. During our August 9th, 1994 meeting at PRC Environmental in San Francisco, regarding Removal Actions at Hunter's Point, it was mentioned by Mr. William McAvoy that polluted soils from tank Draft Summary UST Removals and Closures in Place excavations were discharged back into excavations. The specific sites were not discussed, however it should be

noted that polluted soils that are discharged back into site excavations that have not been adequately characterized, and demonstrated to not pose a threat to groundwater and/or surface waters, constitute an illegal discharge under the State Water Code. Further these discharges would be subject to Waste Discharge Requirements and the substantive requirements of Title 23, Chapter 15, Discharges of Waste to Land.