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From: Commanding Officer, Engineering Field Activity West
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Subj: COMMENTS ON SITE ASSESSMENT REPORT, POTENTIALLY
CONTAMINATED SITES PARCELS B, C, D, AND E, ENGINEERING FIELD
ACTIVITY WEST, HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA
15 APRIL 1994

Encl: (1) Navy Responses to Agencies' Comments on Site Assessment Report, Potentially
Contaminated Sites Parcels B, C, D, and E, Engineering Field Activity West,
Hunters Point Annex, San Francisco, California, 15 April 1994

1. The U.S. Navy's response to the U.S. Environmental Protection Agency's comments dated 24 June 1994, and California Department of Toxic Substances Control's comments dated 5 July 1994 on the subject document is provided as enclosure (1).
2. Should you have any questions regarding this matter, the point of contact is Commanding Officer, Engineering Field Activity West, Naval Facilities Engineering Command (Attn: Mr. Dave Song, Code 09ER1DS), (415) 244-2561).

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NAVY RESPONSES TO U.S. EPA COMMENTS

The following presents the Navy's responses to the U.S. Environmental Protection Agency's (U.S. EPA) comments to the Final Site Assessment Report, Potentially Contaminated Sites Parcels B, C, D, and E for Engineering Field Activity West, Naval Facilities Engineering Command, Hunters Point Annex (HPA) dated April 15, 1994, as presented in U.S. EPA's letter from Alydda Mangelsdorf, dated June 24, 1994. Comments are reproduced exactly as submitted to the Navy.

Comment 1: **The Navy should compile and publish a master inventory of every existing and suspected man-made feature at Hunters Point; all buildings, former building locations, foundations, transformer locations, former transformer locations, underground storage tanks, former underground storage tanks, sumps, vacant lots, scrap yards, dry docks, vaults, etc. A consistent and objective set of criteria should be developed, published and applied to screen the master inventory for features that represent potential sources and releases of environmental contamination. The list of features that represent potential sources and releases of contamination should then serve as the starting point for a site assessment. Documentation of a global screening is necessary to verify that all potential sources and releases have been identified at Hunters Point.**

Response: Although a master inventory of every existing and suspected man-made feature at Hunters Point has not been compiled or published by the Navy, it is believed that the numerous previous investigations, document searches and studies at Hunters Point Annex provide an adequate and comprehensive substitute for such a master inventory. Such a master inventory and list was beyond the scope of the document under discussion and may be more appropriate within such a document such as the Hunters Point Annex BRAC Cleanup Plan.

Investigations, document searches, and studies at HPA began in 1984 with an initial assessment study (IAS) by WESTEC Services, Inc. In 1988, ERM-West conducted a fence-to-fence survey and inventory of suspected and known hazardous materials at the facility. All Navy and tenant facilities, including buildings, piers, electrical substations, and open fields and lots were inspected. The purpose of the Site Assessment (SA) was to identify sites that have not been included in the ongoing Installation Restoration (IR) program. In general, that includes sites previously and sites currently leased by the Navy within the last 10 years. In addition, some previously investigated sites under the IR were also included in the SA where new information indicated a potential past release to the environment. In compiling the list of SA sites, a records search was performed that included reviewing historic building lists, historic maps, and historic aerial photographs. A list of all current and former buildings was prepared (Table 2 of the report). On the basis of regulatory agency file reviews, operational records review, and employee interviews, sites were recommended for further site inspection during the SA. The rationale for choosing or not choosing the sites for further investigation are included in Table 2. On the basis of our review, we believe that all potentially contaminated sites not already being investigated during the IR were identified during the SA.

Comment 2: The Navy should develop and document a consistent set of recommendations for further investigation of similar potential sources and releases. For example, sumps in different buildings, which require further investigation, should be consistently sampled. Similarly, cracked flooring associated with a leaking container should receive consistent evaluation through-out the site. In addition, the Navy should define and consistently distinguish house-keeping activities from CERCLA remediation.

Response: A consistent set of recommendations for further investigation of similar potential sources and releases was employed and documented in the SI, RI, and SA investigations. Section 3.2 of the report describes the field inspection procedures and lists the types of observations that were documented during the inspection. On the basis of these observations, an evaluation was made of the release potential from the unit to soil, surface water, groundwater, and air (Appendix A of the report). Where the release potential was judged to be high or unknown, a specific recommendation (proposed work plan) was made for further investigation. The proposed work plans were designed to limit a phased approach to further investigation and instead to try and investigate fully each SA site to eliminate any further data gaps such that the SA site investigation could effectively be combined with the ongoing IR investigation. An effort was also made to make recommendations for similar potential sources and releases consistent while still accounting for differences in release potential and type of potential contaminant. For example, the vaults and sumps within Buildings 145, 122, 115, 251, and 281 were all recommended for further investigation. The proposed work plan for these sites includes soil borings with hydropunch, soil sampling at 5-foot intervals, and soil and grab water sampling for similar constituents. Similarly, sites with buildings that had cracked flooring were consistently evaluated. Observations documented in these instances included any staining near the cracks; slope of the floor; nearby equipment or hazardous material or hazardous waste storage containers; and any other evidence of leaking or potential for past leaks. An evaluation was also made of the potential for any leak that may have entered the crack and affected subsurface soil and groundwater. Recommendations for further action were based on all of the above factors and therefore are site specific.

Similarly, the Navy has set criteria for actions that constitute housekeeping and have consistently applied those criteria. In general, actions are considered to be housekeeping if they involve general maintenance, cleaning, or precautionary actions for an active or potentially active utility or structure. For example, removal of the fluids within the steamlines was proposed as a precautionary measure to prevent a future release of those fluids into the utilidor; the steamlines at the facility could be used in the future, and, except for the sections associated with Drydock 4, no releases of contaminants to the environment have been identified. In areas where a release to the environment has been identified, the proposed actions are considered to be removal actions and proper documentation will be prepared. This approach is consistent with that at other CERCLA sites where, for example, removal and cleaning of oil/water separators and oil-containing sumps are performed under housekeeping.

Comment 3: During the tour of site assessment areas proposed for further investigation several unknown features were observed; for example, two large liquid filled vaults on the Regunning Pier. Navy personnel present on the tour were unable to address the nature of these features and specifically why they were excluded from further

evaluation. As discussed in comment 1, the Navy should be able to confidently address all man-made features at Hunters Point and whether these features represent sources or releases of contamination.

Response: During the SA inspections, a number of unknown features were observed that did not appear to be related to sites included in the inspection list. These features were described in the report for the nearest SA site. An effort was then made to identify these features and assess the potential for environmental impact from the past or present use of these features. In many cases, the features were identified from either old site plans or from interviews with knowledgeable Navy personnel. Where features were unidentifiable or where the release potential was unknown, a recommendation for further investigation was made that often included a more thorough records search, a geophysical subsurface survey, and a subsequent sampling program. An example of this type of recommendation is the proposed work plan for the vaults near Building 810 (SA-146). See also response to Comment 1.

The two large liquid filled vaults on the Regunning Pier were described in the report for SA-131 and SA-132. Although the purpose of the vaults was not identified it is clear from their location and configuration that there is a potential for any spilled contaminants to affect surface water under the pier. However, the site observations did not indicate any staining or storage of hazardous materials or wastes near the vaults. Because sampling of the surface water and sediments in this area will be addressed in the ecological risk assessment, and because there was no evidence of current potential to affect surface water, these vaults were not recommended for further investigation in the SA.

Comment 4: SA-76, Dry Dock 5, 6, 7. Because sandblasting occurred in these dry docks, sediment sampling should be conducted as part of further work in this area.

Response: Sediment sampling in the areas of Drydocks 5, 6, and 7 was conducted during the Environmental Sampling and Analysis Plan (ESAP) activities. The need for further sampling will be evaluated as part of the ecological risk assessment.

Comment 5: SA-89, Former Building 278. The evidence that this area represents a contaminant source or release does not justify sampling. The Navy should consider removing this area from the SA program.

Response: The site has been removed from the SA program.

Comment 6: SA-127, Storehouse. The evidence that a release to the environment occurred in the parking lot north of Building 407 does not justify sampling. The Navy should consider removing this area from the SA program.

Response: The site has been removed from the SA program.

Comment 7: SA-128, Sheet Metal Shop. The evidence that a release to the environment occurred in Building 439, which was never used, does not justify sampling along H Street. If a more thorough records search indicates the utilities were used, then sampling may be appropriate.

Response: The proposed work plan for SA-128 includes soil boring and hydropunch near a suspected dry well and four underground storage tanks (UST). Observations during the site assessment indicated that the contents of the USTs had been sampled suggesting that the USTs did contain liquids. Prior to installing the soil borings in this area, the USTs will be opened and the tank contents (if any) will be removed. If the tanks do not contain any liquids and appear unused, no further subsurface investigation will be done in this area.

Comment 8: SA-137, Building S-308. The borings proposed in the area north-west of Building 307 should be located in accordance with a hot spot search grid.

Response: The soil borings proposed for SA-137 were located in areas of surface staining or in areas where there was observed storage of hazardous materials or hazardous waste. The purpose of these borings is to evaluate the type and vertical extent of the visible soil contamination and potential groundwater contamination. The location and number of these borings is sufficient to evaluate any potential hot spot in this area.

NAVY RESPONSES TO DTSC COMMENTS

The following presents the Navy's responses to the California Environmental Protection Agency's Department of Toxic Substances Control (DTSC) comments to the Final Site Assessment Report, Potentially Contaminated Sites Parcels B, C, D, and E for Engineering Field Activity West, Naval Facilities Engineering Command, Hunters Point Annex (HPA) dated April 15, 1994, as presented in DTSC's letter from Cyrus Shabahari, dated July 5, 1994. Comments are reproduced exactly as submitted to the Navy.

Comment 1: Page 1, it is not clear why the site assessment investigation has focused on only the last 10 years. It is possible that there are additional buildings/areas that were not investigated as part of the site assessment. It is helpful to have a list of all buildings that were not included in the site assessment. The Cal/EPA will request additional investigation of these facilities if reasons dictate.

Response: Previous field investigations, document searches, and studies at HPA have focused primarily on sites considered eligible for funding through the Installation Restoration (IR) program. Those investigations began in 1984 with an initial assessment study (IAS) by WESTEC Services, Inc. That study and subsequent investigations generally did not include sites that the Navy leased to other parties. The purpose of the Site Assessment (SA) was to identify sites that have not been included in the ongoing IR program. In general, that includes sites previously and currently leased by the Navy within the last 10 years. In addition, some sites previously investigated under the IR program were also included in the SA where new information indicated a potential past release to the environment. In compiling the list of SA sites, a records search was performed that included reviewing historic building lists, historic maps, and historic aerial photographs. A list of all current and former buildings was prepared (Table 2 of the report). On the basis of regulatory agency file reviews, operational records review, and employee interviews, sites were recommended for further inspection during the SA. The rationale for choosing or not choosing the sites for further investigation are included in Table 2. On the basis of our review, we believe that all potentially contaminated sites not already being investigated during the IR were identified during the SA.

Comment 2: Page 15, It is not clear if all the current occupied buildings have been part of the site assessment investigation. The occupied buildings suspected of releases must be assessed for any contamination. For example, the engine house in Parcel E should be investigated for possible releases of hazardous wastes into the environment. There are visible stains in the yard that appear attributable to engine house related activities.

Response: All of the current occupied buildings were assessed during the records search phase of the SA and inspected if appropriate. Table 2 lists all of these buildings and indicates which of these were suspected of releases and recommended for further action. The engine house in Parcel E (Building 809) was inspected for possible releases of hazardous wastes into the environment subsequent to the SA. No serious environmental problems were noted within this building or immediately east of this building. The yards to the north and west of this building were included in the investigation of PA-56. The yards to the south and east of this building will be included in the investigation of SA-146.

Comment 3: Plate 2 does not show the southern border of the installation. Efforts must be made to complete the maps.

Response: The missing southern border on Plate 2 was an oversight. Future reports will include the correct border of the installation.

Comment 4: The criteria for undertaking an exploratory excavation (EE) need to be defined. The text does not provide any information as to why some stained areas of soils are recommended for an EE while others are not.

Response: In general, an exploratory excavation (EE) is recommended for stained areas where the contamination is limited in horizontal extent and where the contamination is presumed to be confined to soil and limited in vertical extent. An example of this would be where a container of waste material was observed to have leaked onto the bare ground such as at SA-142. Sites with solvent or unknown contaminants that have a potential to extend to groundwater are recommended for soil borings with hydropunch such as at SA-101. In addition, a meeting was held on August 23, 1994 to discuss the process to implement the EEs. A "process" Engineering Evaluation/Cost Analysis (EE/CA) was recommended and would contain the criteria for undertaking an EE.

Comment 5: In the southern portion of Parcel E is a debris pile. During the site inspection, the Cal/EPA requested additional information regarding this pile. It was unclear if this pile has ever been investigated for radioactivity or any other contamination.

Response: The debris pile located in the southern portion of Parcel E is within IR-2. There has been extensive soil and groundwater investigation in this area including sampling and analysis for radioactivity. No concentrations of radioactive compounds have ever been found above background concentrations in this area. Concentrations of solvent compounds have been identified in soil and groundwater near the debris pile. Although the source of these compounds has not been identified, HLA believes that the vertical and horizontal extent of solvent contamination has been evaluated.

Comment 6: The scope of work for FUDS was not available in the above report. The Cal/EPA commented on the Parcel E draft SI report with regards to the FUDS. Although the Navy has agreed to investigate the sites as part of the RI investigation, no workplan for RI activities has been submitted. A workplan for these sites must be submitted to the Cal/EPA for review.

Response: The Navy, as stated, has agreed to investigate the FUDS sites under the planned RI investigation for the site assessment sites within Parcel E. A work plan for these sites will be submitted to the regulatory agencies for review prior to the actual investigation once the issues of funding and scheduling for this RI work has been resolved.