

DEPARTMENT OF TOXIC SUBSTANCES CONTROLREGION 2
700 SHENZ AVE., SUITE 200
BERKELEY, CA 94710-2737N00217.003144
HUNTERS POINT
SSIC NO. 5090.3

October 27 , 1995

Engineering Field Activity, West
Attn: Mr. William Radzevich [Code 1823.2]
900 Commodore Drive
San Bruno, California 94066-5006

Dear Mr. Radzevich:

**PARCEL A DRAFT RECORD OF DECISION (ROD) HUNTERS POINT ANNEX
SAN FRANCISCO**

The Department of Toxic Substances Control (Department) has reviewed the Parcel A ROD. The following and enclosed comments from the Regional Water Board are forwarded for your consideration.

1. Section 1.3, the Department recommends to include the SI sites, and how much soil was excavated in each site, in this section. The Parcel A ROD covers both the RI and SI sites and it will be incomplete to exclude the SI sites.
2. Section 1.4, we recommend to include a discussion on the possibility of any future cross contamination onto Parcel A from adjacent parcels in this section.
3. Section 2.2.2, we believe that this section is incomplete without any reference to soil excavations at the SI sites. The section does not state what steps were taken once contamination was found. We recommend to include a table that covers the SI sites, associated chemical concentrations and excavations. In addition, there also has to be a discussion on the geology and hydrogeology at Parcel A. For example, there needs to be reference to the possibility of landslide, as it happened before. A reference to the air monitoring sampling should be included as well.
4. Table 1, please refer to the latest PRG tables.

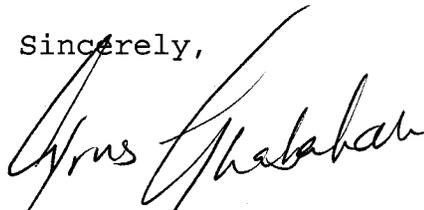


Mr. Radzevich
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5. Please include a signature block for the Executive Officer of San Francisco Regional Water Quality Control Board.
 6. It is very difficult to discern information from Figure 3. We recommend several maps that will show the SI and RI sites, utility lines and sampling locations.
 7. Section 2.6.1, it is not clear why hazard index for nickel is "probably less than 1" given the similarities to ambient levels. Please clarify.
5. We recommend to provide a table with contamination and associated risk. Although, Tables 1 and 2 provide useful information, we would like to see how these chemicals relate to risk values.

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

Enclosure

US EPA
Region IX
Attn: Claire Trombadore
Mail Code H-9-2
75 Hawthorne Street
San Francisco, California 94105

Regional Water Quality Control Board
Attn: Richard Hiett
2101 Webster Street, Suite 500
Oakland, California 94612

STATE OF CALIFORNIA

PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**SAN FRANCISCO BAY REGION**

2101 WEBSTER STREET, SUITE 500

OAKLAND 94612

PHONE: (510) 286-1255

FAX: (510) 286-3986

**VIA FACSIMILE**

510.540.3819

Mr. Cyrus Shabahari

DTSC, Office of Military Facilities

700 Heinz Avenue

Berkeley, CA 94710

October 26, 1995

File: 2169.6032(RCH)

**RE: DRAFT RECORD OF DECISION FOR PARCEL A - HUNTER'S POINT ANNEX
(HPA)**

Dear Mr. Shabahari:

State Water Resources Control Board Office of Chief Counsel staff and Regional Board staff have reviewed the aforementioned document and have attached comments.

For questions or comments please contact the undersigned at (510) 286- 4359 or Ms. Shin Roei Lee at (510) 286-0699.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Hiatt'.

Richard Hiatt
Groundwater and Waste Containment
Division

Attachment

MEMORANDUM

TO: Richard Hiatt

FROM: Frances McChesney

SUBJECT: COMMENTS ON HUNTERS POINT ANNEX PARCEL A DRAFT RECORD OF DECISION

I have reviewed the October 1995 draft Record of Decision for Hunters Point Annex Parcel A and have the following comments:

Section 1.4:

The first paragraph states that the ground water underlying Parcel A is not a potential source of drinking water. This statement should be corrected as follows:

"The ground water underlying Parcel A does not meet the present and probable municipal supply criteria as defined by the single well supply criteria in the San Francisco Bay Regional Water Quality Control Board Resolution No. 89-39 (incorporation of "Sources of Drinking Water Policy")."

Change the fifth sentence of this section as follows:

~~"The only other substance detected . . . in Section 101 of CERCLA and is, therefore, outside the scope of this ROD.~~

Change the sixth sentence of this section as follows:

~~"Although the State of California has authority to regulate the remediation of motor oil in ground water, based on the available information, the State concurs that the levels in groundwater do not does not intend to require further investigation, remediation, or groundwater monitoring (RWQCB 1995b). This parcel, however, will be subject to a deed notification so that future users of the Parcel will be aware of the presence of motor oil in ground water."~~

Section 2.4:

Replace the first paragraph on page 10 as follows:

~~" Since the ground water underlying Parcel A does not meet the present and probable municipal supply criteria as defined by the single well supply criteria in the San Francisco Bay Regional Water Quality Control Board Resolution No. 89-39 (incorporation of "Sources of Drinking Water Policy") it is unlikely to be used as a source of drinking water. Moreover, TPH is not a hazardous substance as defined in CERCLA. The State of California, however, has authority to regulate the~~

remediation of motor oil in ground water. Based on the available information, the State does not intend to require further investigation, remediation, or groundwater monitoring (RWQCB 1995b). The parcel, however, will be subject to a deed notification so that future users of the Parcel will be aware of the presence of motor oil in ground water. In summary, based on current information, no action is required at any site on Parcel A.

Section 2.5.1:

Change the first sentence of the third paragraph as follows:

"Parcel A ground water does not meet the present and probable municipal supply criteria as defined by the single well supply criteria in the San Francisco Bay Regional Water Quality Control Board Resolution No. 89-39 (incorporation of "Sources of Drinking Water Policy")

Change the last sentence of the third paragraph as follows:

"The RWQCB agrees concurs that Parcel A ground water does not meet the criteria as a source of drinking water under the RWQCB's definition. is not a source of drinking water.