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From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering
Command

To: Distribution

Subj: RESPONSE TO COMMENTS ON THE DRAFT FINAL FIELD SAMPLING PLAN
FOR THE FORMERLY USED DEFENSE SITES, ENGINEERING FIELD ACTIVITY,
WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS POINT
SHIPYARD, SAN FRANCISCO, CALIFORNIA

Encl: (1) RESPONSE TO COMMENTS ON THE DRAFT FINAL FIELD SAMPLING
PLAN FOR THE FORMERLY USED DEFENSE SITES

1. Enclosure (1) is the Navy's response to comments from the Agency for Toxic Substances and
Disease Registry on the draft final field sampling plan for the formerly used defense sites,
Engineering Field Activity, West, Naval Facilities Engineering Command, Hunters Point
Shipyard.

2. If you have any questions regarding this enclosure, please contact Ms. Luann Tetirick,
Code 1832.4, at (415) 244-2561, FAX (415) 244-2654.

Original signed by:

RICHARD E. POWELL
By direction of
the Commanding Officer

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RESPONSE TO COMMENTS ON THE DRAFT FINAL FIELD SAMPLING PLAN FOR THE FORMERLY USED DEFENSE SITES

This document presents the Navy's responses to comments from the Agency for Toxic Substances and Disease Registry (ATSDR) on the draft final field sampling plan (FSP), dated April 26, 1996, for the formerly used defense sites (FUDS) at Hunters Point Shipyard (HPS). ATSDR submitted the only comments received on the draft final FSP. They were presented in a letter from Ms. Diane Jackson, ATSDR, to Mr. Dave Song, Navy, dated May 29, 1996.

1. **Comment:** Your field sampling plan does not indicate methane monitoring. If methane sampling has not been conducted since September 1994, we think it is important to have it included in your sampling plan.

In our September 30, 1994 public health assessment, we recommended that you determine the extent and magnitude of methane pockets identified in IR-1/21, 12 and 18. Those three areas are near the Formerly Used Defense Sites (FUDS) sites and the methane pockets could have migrated off site into the FUDS parcels. If they have migrated, they could pose an explosion hazard for building occupants, samplers, or utility workers in the areas suspected to be on or near the old industrial landfill.

Response: In a letter to ATSDR dated March 29, 1994, the Navy's contractor Harding Lawson Associates (HLA) reported existing methane field screening data. These screening data, in conjunction with boring log information, were used to delineate general areas of industrial landfill debris and subsurface methane. This type of methane data has been collected during the ongoing remedial investigation (RI) at HPS. During drilling activities, field personnel perform continuous borehole monitoring for combustible gases and organic vapors in compliance with the HPS health and safety program. Although this monitoring was not specifically outlined in the FSP, it will be part of the work performed at the FUDS. The combustible gas indicator that will be used can detect the presence of potentially explosive conditions caused by high concentrations of methane. Concentrations of methane below the detection limit of this instrument are not of concern because they would not be expected to pose a significant explosive or asphyxiant risk.

In their letter, HLA observed that methane concentrations encountered during previous drilling "dissipate rapidly to nondetectable concentrations, generally in minutes or hours." This quick dissipation is interpreted to mean that the methane pockets are highly limited in extent and magnitude, that the industrial landfill is relatively highly compacted, and that the potential for significant subsurface migration of methane is slight. Under these conditions, further characterization of methane distribution would not add appreciably to the information already gathered. The highly compacted fill and limited potential for migration of methane are thought to be typical of the landfilled areas of HPS. Ongoing RI activities have not observed any methane outside the three areas

described by HLA in 1994. Except along the northern boundary of IR-1/21 and the off-site, northern edge of IR-18, the extent of the landfill debris and associated methane pockets is considered established. The borehole monitoring to be performed as part of the proposed FUDS sampling should address the data gap along the northern boundary of IR-1/21.

In contrast to the routine methane monitoring performed during the RI, the only sampling event at HPS during which soil gas samples were collected and submitted to a laboratory for methane analysis was completed in February of 1989 as part of the Navy's compliance with the California Air Resource Board's Solid Waste Air Quality Assessment Test. The methane data collected as a result of this testing were not significantly different from the field screening information reported by HLA. Additional landfill characterization beyond the FUDS monitoring is not planned for this phase of the RI and feasibility study process.

2. **Comment:** **If you did look at the extent of the methane migration, did you review existing building construction drawings to identify crawl spaces, basements, sub-slab ducts or other features that could allow gas to migrate into and collect inside structures? Could gases have migrated into utility spaces?**

Response: The configuration of the buildings was evaluated as part of the planning process for the FSP. Buildings 820 and 831 are believed to have been built on concrete slabs. No crawl spaces, basements, subslab ducts, or other features are known to exist under these structures. Building 830 has an access space under the building. A more detailed investigation of the buildings may be appropriate once the currently proposed sampling has been completed and the extent of the landfill and any associated contamination has been defined. Building 815 has a basement level but is not thought to be located close enough to the industrial landfill (IR-1/21) to be affected by potential methane migration. None of the FUDS is sufficiently close to IR-12 or IR-18 to be affected by methane potentially migrating from these sites.

Facility maps show that most of the utilities in the vicinity of the FUDS are located on Crisp Avenue. The currently proposed sampling should delineate the northern extent of the industrial landfill and its potential to impact these utilities. At least two storm sewer lines are believed to extend from Crisp Avenue, south across IR-76, to the edge of the industrial landfill. Any such lines could be in contact with industrial debris and could contain significant concentrations of methane. A removal action proposed for groundwater in IR-1/21 would involve permanently plugging these lines.