



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

May 13, 1999

Mr. Richard Powell, Code 6221
Department of the Navy
Engineering Field Activity, West
900 Commodore Drive
San Bruno, CA 94066-5006

Subject: Draft Final Data Gaps Sampling and Analysis Work Plan for Parcel E, Hunters Point Shipyard

Dear Mr. Powell:

EPA has completed review of the subject document dated April 26, 1999. Our comments are included in the attachment. If you have any questions regarding these comments, please call me at (415) 744-2387.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sheryl Lauth".

Sheryl Lauth
Project Manager

cc: David Leland, RWQCB
Chein Kao, DTSC
Amy Brownell, City of SF
Luann Tetirick, Navy
Jim Sickles, Tetra Tech

**EPA's Comments on the Draft Final Data Gaps Sampling
and Analysis Work Plan for Parcel E, Hunters Point Shipyard**

COMMENTS ON RESPONSES TO COMMENTS

1. **Response to Specific Comment 2 and Section 2.2.2, p. 9, paragraph 2.** It is somewhat misleading to state that the vertical extent of contamination has been defined when the borings where samples were collected at depths greater than 6 inches were 80 to 100 feet away. Vertical delineation must be done in the source area; comments from both EPA and DTSC stated that the vertical extent of dioxin contamination has not been defined. The absence of dioxin in subsurface soil cannot be verified unless samples are collected both at the surface and at depth from the same boring in the source area. EPA does not agree that sampling for dioxins can be limited to surface samples.
2. **Response to Specific Comment 3.** Location IR02SS394 is not south of either IR02SS378 or location IR02SS375, but is southwest of both locations. The area that is not covered is near Building 600.
3. **Response to Specific Comment 10.** The issue raised in the original comment, specifically, whether the location of proposed well IR12MW22A is located downgradient of boring IR12B001 was not addressed. It is more important to place this well downgradient of boring IR12B001 or downgradient of the area with residual product than to place it south of an area with residual product.
4. **Response to Specific Comment 12.** The response does not specify the depth of Hydropunch sample IR36B104 as requested in the original comment. This information is critical so agency reviewers can evaluate whether screening the well at the bottom of the A-aquifer is appropriate. Please provide the depth of this sample.
5. **Response to Specific Comment 13.** There is a typographic error in this response. The reference should be to Section 4.7, not to 4.6.
6. **Response to Specific Comment 14 and Section 5.2.1, p. 37, paragraph 2.** Before this well is developed, the Navy should determine if DNAPL is present. If DNAPL is present, it should be sampled. Then, and only then, can this well be developed. If DNAPL returns after the well is developed, this sample does not necessarily have to be analyzed, however if DNAPL does not return, this sample must be analyzed. It would be useful to analyze both the pre- and post-development samples to determine if the development process resulted in any changes.
7. Both EPA and the State asked for more information to be presented on figures. Referring to a multi-volume RI report is not acceptable. At a minimum, the appropriate figures could be reproduced from the RI and included in an Appendix to the Work Plan.

COMMENTS ON NEW MATERIAL

1. **Section 2.2.3.** Please quantify the PCB detections (up to 150,000 $\mu\text{g}/\text{kg}$) and include maps from the Parcel E RI (Figures 4.7-2 and 4.2-3) to be consistent with the discussions of the other IR sites included in this Data Gaps SAP.
2. **Section 3.1, p. 20, bullet 1, Section 3.2, p. 20, bullet 2, and Section 4.2.** The vertical extent of dioxin contamination is unknown at IR-02 Central. This was noted by both EPA and DTSC in comments on the Draft SAP, and should be addressed in these sections.
3. **Section 3.1, p. 20, bullet 2.** The IR-04 data gap should include the fact that the PCBs appear to extend into IR-01/21 and state that the extent of PCBs in the eastern part of IR-01/21 is unknown.
4. **Section 3.3, p. 21, bullet 2.** Both surface and subsurface samples are needed to evaluate the extent of dioxin contamination.
5. **Section 3.3, p. 21, bullets 3 and 5.** An additional four soil samples (one additional boring) are needed to resolve the IR-04 and IR-01/21 PCB data gap, as stated in Comment 6, above.
6. **Section 3.5, p. 22, bullet 2.** The decision rule should include the need to delineate the vertical extent of dioxin contamination.
7. **Section 3.5, p. 23, bullet 1.** Also include the southeastern part of IR-01/21 in this bullet. The data gap for PCBs in RI-01/21 was identified in Sections 3.2 and 3.3, but not identified in this section, in Section 3.1, or in Section 4.0.
8. **Section 4.3 and Figure 7.** One additional boring should be completed near the southern edge of IR-12 (i.e., south/southeast of location IR01SS349) to fill the data gap that exists in this area. Locations IR01SS349 and IR12SS19 were surface sample locations, so it is not known if there are PCBs at depth in this area.
9. **Section 5.3.** This section does not contain special sampling procedures for DNAPL wells. Groundwater and separate phase samples should be collected both before and after well purging.