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DEPARTMENT OF THE NAVY
WESTERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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SAN BRUNO, CALIFORNIA 94066-2402

IN REPLY REFER TO
5090
Ser T4A1WM/L4116
27 Jan 1994

From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: RESPONSES TO AGENCY COMMENTS ON THE PARCEL B SITE INSPECTION VOLUME II/III PRESENTATION MEETING, AND PARCEL C SITE INSPECTION VOLUME III DATA PRESENTATION MEETING, NAVAL STATION TREASURE ISLAND, HUNTERS POINT ANNEX

Encl: (1) Responses to EPA Comments, Parcel B Site Inspection, Volume II/III Data Presentation
(2) Responses to EPA Comments, Parcel C Site Inspection, Volume III Data Presentation

1. In accordance with the Naval Station Treasure Island, Hunters Point Annex Federal Facilities Agreement, enclosures (1) and (2) provide the Responses to EPA Comments, Parcel B Site Inspection, Volume II/III Data Presentation, and the Responses to EPA Comments, Parcel C Site Inspection, Volume III Data Presentation at Hunters Point Annex. Please review the enclosures and provide written comments to Commander, Western Division, Naval Facilities Engineering Command, (Attn: Michael McClelland, Code T4A1MM), 900 Commodore Drive, San Bruno, CA 94066 with a copy to William McAvoy, Code T4A1WM, by February 28, 1994.

2. If you have any questions regarding this matter, please contact William McAvoy, Code T4A1WM at (415) 244-2554.

CAMILLE GARIBALDI
By direction

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U.S. Environmental Protection Agency (Attn: Raymond Seid w/2 cys of encl)
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California Regional Water Quality Control Board (Attn: Dr. Barbara M. Smith)
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Enclosure One

NAVY RESPONSES TO REGULATORY AGENCY COMMENTS ON THE PARCEL B SITE INSPECTION VOLUME II/III DATA PRESENTATION MEETING JULY 27, 1993

The following presents the Navy's responses to the Environmental Protection Agency's (EPA's) comments regarding the Parcel B Site Inspection Volume II and III data presentation meeting on July 27, 1993. The comments were presented in a letter from Roberta Blank (EPA) to Ray Ramos (WESTDIV) dated August 11, 1993, and in Bechtel's letter to the EPA dated August 11, 1993. No comments were received from the California Environmental Protection Agency's Department of Toxic Substances Control (DTSC) or the California Regional Water Quality Control Board, SanFrancisco Bay Region (RWQCB). Comments are reproduced exactly as submitted to the Navy.

GENERAL COMMENTS, EPA LETTER DATED AUGUST 11, 1993

Comment 1: **The screening being used to determine if sites should move forward into the remedial investigation phase is based on a commercial use scenario. At this stage of the project, it may be more prudent not to screen out sites based on a commercial use scenario. In the feasibility study we may want to be able to compare cleaning up to one scenario versus another, based on technical, cost and other criteria.**

Response: Comment acknowledged. Comparisons of observed concentrations to health-based-levels corresponding to a commercial use scenario were performed to qualitatively evaluate the relative risk of the contaminants detected based on probable use of this area. Please note that comparisons to Health-Based Levels (HBLs) corresponding to residential use scenarios were also made and could be used in the feasibility study phase of these investigations.

Comment 2: **The point of departure used in the SI screening for risk assessment should be the same for all of the receptors. The SI screening report uses a risk of 10-4 for child residents; 10-5 for adult residents and 10-6 for commercial workers. The 10-6 level should be used for all receptors.**

Response: The Navy apologizes if there was a misunderstanding regarding the application of the SI screening levels. The point of departure used in the SI screening for risk assessment was 10^{-6} for all three receptors; each of the three screening risk levels (10^{-6}, 10^{-5}, and 10^{-4}) was used to evaluate potential exposures for each of the three receptor populations. The data presentation for subsequent parcels has been clarified. Specifically, the Key to Health Risk Notation System in the data presentation packets has been appended to contain a second example, which should allay confusion in future presentations.

Comment 3: **EPA, as stated in review of previous reports, does not support a calculation of risk based levels for TPH.**

Response: HBLs were calculated for all chemicals individually and for several multiple compound parameters, including TPH. HBLs have been applied only as a screening tool to evaluate the need for additional characterization of soil and groundwater.

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Comment 4: **We are still working with the State of California to evaluate appropriate background levels for the site and when this effort is completed, the SI site screening may need to be revisited using the agreed upon values.**

Response: The Navy looks forward to reaching an agreement with the EPA and the State of California on appropriate background levels. In the SI data presentation concentrations of inorganics were compared to Interim Ambient Levels (IALs) in lieu of agreed-upon levels, to evaluate the relative concentration distribution with regard to the current understanding of the occurrence of metals in soil and groundwater at the site.

GENERAL COMMENTS, BECHTEL LETTER TO THE EPA, DATED AUGUST 11, 1993

Comment 1: **As previously commented, future presentations of site inspection data should include a more detailed discussion of the missions and operations associated with the site and identification of specific chemicals and chemical products used in operations at the site. This discussion should also describe the ability of the selected sampling and analytical discussion to detect and identify the chemicals used in operations at the site. This discussion is essential to assure the regulatory agencies and the public that all chemicals of potential concern have been identified and quantified.**

For example, Building 146 at PA-23 is identified as a photograph development laboratory. The Navy should discuss common chemicals and chemical products used in a photograph development laboratory and the ability of the selected sampling and analytical methods to detect and identify these chemicals.

Response: In approaching presentation of the SI data to the agencies, the Navy and its consultants proceeded under the assumption that the agencies had a basic understanding of the SI work plans, and the sampling and analytical testing approach presented therein. The Navy appreciates the need to assure the agencies and the public that all chemicals of potential concern are addressed; however because these plans had been reviewed and approved by the agencies, and in the interest of keeping the presentations streamlined and focused on the SI results, only a brief description of the historical and present use of each building or area investigated, along with a summary of known chemical use and field observations, was presented as part of the SI data presentation to the agencies. The investigation proposed in the SI work plans for each PA site was tailored to meet the information available at the time. To provide the detailed information requested would result in a very lengthy and tedious process that would impact the usefulness and significantly increase the length of the data presentation meetings.

Comment 2: **The Navy continues to use disputed contaminant background levels to make decisions about the extent of contamination and the extent of required removal actions. If final contaminant background levels are lower, then the Navy's proposed excavation may not be sufficient to reduce contaminant concentrations to the new lower background levels.**

Response: See response to EPA General Comment 4. Background levels have been used to characterize the extent of contamination; they have not been used to set target cleanup levels or to make decisions about the extent of removal actions. It is expected that cleanup levels would be based on risk assessment results and would not necessarily be set at background levels.

Comment 3: **The Navy continues to use health based levels to deselect chemicals of potential concern. This strategy was initially criticized during Bechtel's review of the Navy's Draft Operable Unit II Public Health and Environmental Evaluation Report. The use of health based levels as a method to deselect chemicals of potential concern is not approved by the EPA.**

Response: The health-based levels were used as a screening tool only, and are not used to deselect potential chemicals of concern. All occurrences of organic chemicals and all inorganic occurrences above IALs (background) were posted and presented for review in the data presentation. HBLs were used only for comparison purposes and not to screen chemicals prior to posting.

Comment 4: **The work plans described in the site inspection data presentation materials can be viewed as an addenda to the previously submitted remedial investigation plans. In the process of preparing these work plan addenda the Navy should assess whether the combination of site inspection data and data collected as part of the remedial investigation of interim action operable units is sufficient to prepare a parcel remedial investigation report, public health and environmental evaluation, and feasibility study. For example, no wells are proposed for PA-26. Has the groundwater in this area been characterized as part of a different investigation?**

Response: To document the process by which the Navy and its consultants evaluate the completeness of data for each PA site, as well as each parcel, the PA Site Inspection Flow Chart was developed and was included in the data presentation materials. It clearly shows an evaluation of whether there is sufficient data to characterize the site for the RI, PHEE, and FS, and was based on the premise that the SI program was designed to investigate the worst case areas in each PA. In the case of PA-26, there was no indication that the activities at the site would have resulted in contamination of the groundwater. If, during the RI program, it appears that there is the potential for groundwater contamination, based on results of grab groundwater samples from borings installed during the RI program, then wells and/or Hydropunch sampling will be added to the field program and the agencies will be notified through the field variance process.

SPECIFIC COMMENTS, BECHTEL LETTER TO THE EPA, DATED AUGUST 11, 1993

Comment 1: **The field screening methods described in the proposed work plans should be described in more detail and specifically tailored to the contaminants of concern.**

Response: The Navy and its consultants are currently reviewing several different field

screening methods and agree that the techniques applied should be specifically tailored to the contaminants of concern identified at each site. Methods selected will be documented in the parcel SI reports.

Comment 2: **The excavation procedure at location EE08 of PA-23 and PA-42 should include collection of at least one confirmation sample. Field screening by visual observation is not adequate to confirm the absence of contamination.**

Response: As indicated in the data presentation materials, confirmation samples will be collected at all proposed exploratory excavation (EE) sites. The Navy agrees that field screening by visual observation is inadequate to confirm or deny the absence of contamination, and it was not the Navy's intent to suggest the use of visual observations alone for confirmation.

Comment 3: **Relevant installation restoration site data should be presented with site inspection data. This information could, for example, support the decision not to perform work at Building 124 in PA-24.**

Response: Comment acknowledged; where appropriate, IR site data will be included in future SI data presentations. The decision not to perform work at Building 124 was presented initially in the SI Volume II work plan, which was approved by the agencies in mid-1992.

Comment 4: **Detect limits for organics may vary from sample to sample. This criteria should be used with caution to deselect chemicals of potential concern. For example, samples from boring PA25B009 and surface sample PA25SS10 have similar concentrations of chrysene, but, other PAHs detected in PA24SS10 were not detected in PA25B009. Could this be due to sample clean-up problems associated with the higher levels of TOG found in the sample from PA25B009?**

Response: The presence of chrysene at similar concentrations in both samples, combined with the presence in PA25SS10 of other PAHs at concentrations similar to that of chrysene suggest different sources as opposed to detection limit problems. This is supported by the different releases investigated by the two samples: an isolated stain at PA25SS10 and soil adjacent to the sump at PA25B019.

Comment 5: **Has the crystalline silica content of sandblast grit been characterized by sampling and analysis? If not, the Navy should address the possible presence of crystalline silica in sandblast grit.**

Response: Analysis of the crystalline silica content of sandblast grit was not included in the scope of the SI program, and has not been proposed for the RI program. Sandblast grit issues are being addressed as part of the sandblast grit fixation project already underway.

Comment 6: **The Navy should describe the potential source(s) of arsenic at PA-57.**

Response: It is believed that the source of the arsenic is paint chips from ships that were sandblasted at Drydock 4. Arsenic exceeding health-based levels was only observed in storm drain catch basins at PA-57 (Drydock 4); no elevated concentrations were observed in samples of soil beneath paved areas or in sandblast materials collected from the ground surface or a storage hopper. It is reasonable to assume that spent sandblast material, along with paint chips and metal particles, was distributed throughout the work area at the drydock and found its way to storm drain catch basins during cleaning operations or through natural runoff of precipitation.

Comment 7: **The Navy should describe in detail and illustrate with a flow chart the decisions required to find that no further characterization and clean-up are needed at a site.**

Response: See response to EPA General Comment 4. The flow chart was subsequently revised at the request of the EPA to show that the Navy specifically evaluated the data for evidence of a point-source release. This revised flow chart was included in the Parcel D and E SI Volume II and III data presentation meeting held November 2, 1993.

Enclosure Two

NAVY RESPONSES TO EPA COMMENTS ON THE PARCEL C SITE INSPECTION VOLUME III DATA PRESENTATION MEETING AUGUST 31, 1993

The following presents the Navy's responses to the Environmental Protection Agency's (EPA's) comments regarding the Parcel C Site Inspection Volume III data presentation meeting on August 31, 1993. The comments were presented in a letter from Roberta Blank (EPA) to Ray Ramos (WESTDIV) dated September 23, 1993. No comments were received from the California Environmental Protection Agency's Department of Toxic Substances Control (DTSC) or the California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB). Comments are reproduced exactly as submitted to the Navy.

GENERAL COMMENTS

Comment 1: **The criteria used to assess whether contaminants indicate a point source release should be presented for our review. The Navy is proposing certain sites that exceed the risk screening levels be excluded from further investigation because they did not represent a point source release. The PA Site Inspection Flow Chart should indicate that screening by whether contaminants are point sources is part of the decision making process.**

Response: A point source decision box has been added to the PA/SI flow chart in all subsequent data presentation materials. In general, point source releases are associated with laterally and vertically extensive contamination and sites of known or suspected chemical use or release. If a chemical is confined to the shallow subsurface, is infrequently encountered, and does not appear to be associated with a known or suspected usage area or release, then its presence is generally attributed to a non-point source. The rationale for no further investigation of non-point sources is that additional samples would not serve to define the lateral and vertical extent of contamination because concentrations measured in adjacent samples are not likely to correlate with one another.

Comment 2: **As stated in our Parcel B SI comments, we are still working with the State of California to evaluate appropriate background levels for the site and when this effort is completed, the SI site screening may need to be revisited using the agreed upon values.**

Response: Comment acknowledged. Resolution of background levels is slated for January 1993.

Comment 3: **The Navy should consider a more focused analytical program for the remedial investigation (RI). Only those classes of compounds identified as being of concern in the site inspection should be sampled for in the remedial investigation. The resources saved should be used to increase the numbers and locations of samples collected, where needed.**

Response: The RI program for Parcel C is characterizing the extent of soil and groundwater contamination in areas that often extend beyond the known sources of contamination (e.g., into streets, alleyways, etc.). Sampling in areas of investigation between individual PAs or buildings may serve to define the contamination associated with variable source areas that may have different classes of chemicals of concern. Reductions in the analytical program at this stage of the investigation may miss important

characterization details in these types of areas. In addition, only one quarter of monitoring has been completed on the limited number of wells installed as part of the Parcel C SI. It is possible that new chemicals of concern may become apparent as new wells are installed and three quarters worth of data are collected. Furthermore, for purposes of risk assessment of the parcel, it is prudent to know the types and quantities of compounds present in these areas to enable a full characterization of the risk associated with the parcel. Indeed, as additional data are collected, reductions of the analytical program are appropriate. This has already occurred in other parcels where the Quarterly Groundwater Monitoring Program has reduced the list of analytes to only those constituents found after three rounds of monitoring.

Comment 4: **When levels of TPH and TOG lead to a decision to investigate further, the objective of the analytical program should be to identify potentially hazardous components of the hydrocarbon contamination. As stated in previous comments, we do not support the calculation of risk based levels for TPH. Also, the health based levels for TPH and TOG exceed the levels recommended by the Regional Water Quality Control Board for protection of water quality and aquatic resources. Relying on these levels now to make decisions not to further investigate a site, may result in the Navy returning to these areas later for further investigation which could have negative schedule implications.**

Response: The potentially hazardous components of TPH and TOG are VOCs, SOCs, and metals. These compounds are tested for individually in all samples and are used in the evaluation of whether additional work is necessary at a site (e.g., using the HBLs). Thus, resolving differences of opinion regarding TPH/TOG human health risk assessments may not be necessary since the hazardous components are also used in the decision-making process. Water quality/aquatic resource issues will be addressed at the time of the Parcel RI and Ecological Risk Assessment document. It is the Navy's understanding that use of HBLs as tools for deciding whether or not to further investigate a site is acceptable to the agencies.

Comment 5: **The interiors of several buildings in this parcel have not been investigated because the buildings are currently occupied by Navy tenants, for example Buildings 230, 270, 271, and 281 in PA-28. The Navy should not allow access problems to interfere with this important phase of data gathering. The needed sampling should be presented to the regulators as soon as possible, in a Field Variance addendum to the work plan.**

Response: No access problems were encountered with Buildings 230, 270, and 271; samples were not collected because no problems were observed. At Building 281, the Navy will sample when the Defense Logistics Agency (DLA) can move equipment to allow for access. The Navy plans to investigate the perimeter of Building 281 during the RI, as part of adjacent investigations to address groundwater and UST contamination. It is anticipated that field variances for Building 281 will be submitted during the RI for Parcel C.

Comment 6: **In several locations, for example PA-28 Building 231 and PA-58, the Navy proposes to locate monitoring wells based on initial analytical results. The location and basis for**

the location of these wells should be described in a Field Variance addendum to this work plan and submitted to the EPA and State agencies for review.

Response: Comment acknowledged. Field variances will be submitted prior to the time the wells are installed.

Comment 7: **Work Plan - Volume 3 Quality Assurance Project Plan (QAPjP) should be amended to include quality assurance requirements for the proposed hydropunch and flux chamber studies. The QAPjP amendment should also include a detailed description of how these studies will be performed.**

Response: Comment acknowledged. QAPjP amendments will be provided to the agencies prior to hydropunch and flux chamber activities.

Comment 8: **EPA's policy on filtering groundwater samples is attached. The RI phase for all parcels should conform to this policy to avoid future problems in risk assessment review.**

Response: The Navy does not agree on the proposed policy and will provide justification for deviating from the policy.

Comment 9: **For the exploratory excavations, the Navy should report on volumes excavated, target levels used, storage and disposal methods, and extent of contamination in a Field Variance addendum to this work plan, as soon as possible after the work is done (by PA site or Parcel, as opposed to by individual excavation).**

Response: Comment acknowledged. The Navy will provide a field variance summarizing the exploratory excavations in the parcel soon after the work is completed in the parcel.

Comment 10: **The decision making process for carrying sites into the RI phase does not include the use of ecological criteria, and only addresses human health criteria and human health ARARS. The Navy should include ecological criteria such as ambient water quality criteria and sediment quality criteria in this screening process.**

Response: The Navy believes that it is not appropriate to consider ecological criteria at this stage of the investigation because ambient water and sediment quality criteria apply to media in the Bay, and no SI samples were collected in the Bay; however, the Navy welcomes the opportunity to work with the agencies to develop a scenario as the basis for comparison.

SPECIFIC COMMENTS

Comment 1: **PA-27 Building 205. The Navy should ensure that housekeeping activities prevent or minimize oil leakage and water intrusion into the pump chamber.**

Response: Comment acknowledged.

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Comment 2: **PA-28 Building 211/253. The Navy should focus the RI analytical program on volatile and semivolatile organic compounds and complete additional borings to define the eastward and westward extent of volatile organic compound contamination associated with PA28SS76.**

Response: Comment acknowledged. The Navy intends to more fully characterize this area as presented in Attachment A.

Comment 3: **PA-28 Building 211/253. The magnesium concentration reported in the sample collected at PA28B045 appears to be an error.**

Response: Although the reported concentration of magnesium may be an error, the value may be correct. At other locations at HPA, high values of naturally-occurring magnesium have been noted in serpentinite bedrock. The IAL for serpentinite fill is 255,000 mg/kg, a value only slightly below the value of about 270,000 mg/kg noted in sample PA28B045.

Comment 4: **PA-28 Building 219. Focus the analytical program on PCBs and hydrocarbons. An additional boring, outside the building should be considered to further define the lateral and vertical extent of contamination.**

Response: Adjacent hydropunch borings from which soil samples will be collected are believed to be sufficient to further define the lateral and vertical extent of PCBs in soil.

Comment 5: **PA-28 Building 231. Groundwater samples collected as part of the remedial investigation at this location should be analyzed for both volatile and semivolatile organic compounds, not just volatiles.**

Response: Comment acknowledged. The hydropunch groundwater samples from beneath the sumps will be analyzed for the full list of compounds. Hydropunch samples from transects at the perimeter of the building will be analyzed for VOCs only, as a means to rapidly define the limits of the VOC plume. All monitoring wells will be analyzed for the full analytical list of compounds.

Comment 6: **PA-28 Building 231. The Navy should submit confirmation samples to a fixed laboratory.**

Response: The Navy intends to submit all samples to a fixed laboratory, including Hydropunch samples. 48-hour turnaround times will be requested for most Hydropunch samples. As such, confirmation samples will not be necessary.

Comment 7: **PA-28 Building 231. If wells installed as part of the remedial investigation will become part of the groundwater tidal influence monitoring network, data comparable to that collected at other wells in the network should be collected.**

Response: At this time, the Navy does not plan to perform tidal influence monitoring on wells installed as part of the RI as several Parcel C wells and piezometers were monitored

in the TIMP.

Comment 8: **PA-28 Building 231. The Navy's soil analytical program at this location should be focused on volatile and semivolatile organics and metals. The Navy should collect additional soil and groundwater samples adjacent to the various sumps in this building to determine the lateral extent of contamination, if contamination is found to be present beneath the sumps.**

Response: The Navy intends to submit soil samples in and around Building 231 for the full analytical list of compounds. The combination of previous and proposed borings and wells inside and outside Building 231 is sufficient to characterize the lateral and vertical extent of contamination in groundwater and soil.

Comment 9: **PA-28 Building 231. See general comment number 6.**

Response: Comment acknowledged. Field variances will be submitted prior to the time the wells are installed. See response to general comment 6.

Comment 10: **PA-28 Building 258. Soil and groundwater samples collected as part of the remedial investigation at this location should be analyzed for Cr (VI).**

Response: Chromium VI was not identified in seven samples collected up to 10.75 feet bgs near the dip tanks (PA28B060, PA28B061, and PA28B062). Consequently, it is not considered a chemical of concern at Building 258.

Comment 11: **PA-28 Building 270. The Navy should provide the data associated with the stain east of Building 270 identified at completion of SI activities. Page PA-20 says that sampling results for this stain are pending.**

Response: Table 1 presents a summary of the results from the sample collected from the stained soil east of Building 270 along with a summary of which HBLc and HBLn are exceeded. HBL exceedances include Aroclor 1260, TOG, and lead. For this reason, an exploratory excavation is planned at the stained soil.

Comment 12: **PA-28 Building 270. The Navy should specify how sandblast grit associated with sample PA28SB67 will be incorporated into the sandblast grit fixation program. This applies to all other areas where sandblast grit was sampled. How will the Navy determine whether in fact all of this material is appropriate for inclusion in the grit fixation program, and if it cannot be, how will it be disposed of?**

Response: The Navy is currently working out the details of addressing sandblast grit in the grit fixation program. If any of the material is found not to be suitable for inclusion in the sandblast grit fixation program, it will be disposed of appropriately.

Comment 13: **PA-28 Building 270. The Navy should consider an immediate action to prevent transport of contaminants associated with sample PA28SW66.**

Response: The Navy will clean out the PA28SW66 storm drain catchment basin as soon as possible.

Comment 14: PA-58. See general comment

Response: Comment acknowledged.

Comment 15: PA-58. The Navy should consider the need for a geophysical survey at this site.

Response: The Navy intends to perform a focused geophysical survey at each boring location to clear the boring for drilling.

Comment 16: PA-29 Building 203. The Navy should consider an exploratory excavation centered around boring PA29B017 due to arsenic contamination. While the observed arsenic concentration is similar to that consistently found in other areas of Hunters Point, arsenic has not been consistently found in this area of the site. The possibility of a point source release cannot be definitively discounted.

Response: At boring PA29B017, arsenic concentrations slightly above IALs are confined to the shallow soil sample. Arsenic was not found above IALs below 2.25 feet bgs. No obvious releases were observed. These types of relationships are often encountered at HPA and have been attributed to diffuse non-point source releases. The need for an exploratory excavation or other action for such shallow non-point sources will be addressed on a parcel-wide basis in the Parcel C RI/FS report.

Comment 17: PA-29 Building 203. The groundwater contamination indicated by a product sheen in boring PA29B003 should be addressed under the remedial investigation program not the underground storage tank program.

Response: Comment acknowledged. This was addressed in the Volume I Parcel C presentation on October 12, 1993.

Comment 18: PA-29 Building 275. The Navy should evaluate why aluminum was not detected above background levels in sample PA29SS15.

Response: It is unclear why aluminum was not detected above background levels in sample PA29SS15. Quite possibly, local aluminum sources (e.g., foundry dust) have not migrated below the concrete flooring.

Comment 19: PA-29 Building 275. The Navy should determine the vertical extent of PCB and PAH contamination near the location of PA29SS15 regardless of the status of tenant occupancy.

Response: Two additional borings are planned at this location as agreed to at the Parcel C SI Volume III Data Presentation Meeting on August 31, 1993.

Comment 20: PA-29 Building 217. Having only two surface soil samples, PA29SS07 and PA29SS08

may not be representative of the area beneath Building 217. It is unclear how the Navy intends to assess whether after cleaning out the floor vaults and beneath the floor plates, additional sampling should be conducted at Building 217. This applies to Buildings 279 and 280, and PA-30 also.

Response: Visually, Building 217 is relatively clean with little evidence of floor staining other than the areas already sampled at PA29SS07 and PA29SS08. For this reason, no additional soil samples are believed to be necessary. If cracks, seams, or degradation of the floor vaults are noted after cleanout, borings/trenches will be completed to assess if soil contamination has occurred. The Navy's consultants will provide documentation to the regulators of their visual observations after the cleanout.

Comment 21: PA-29 Building 280. Due to potential PCB contamination, the area around PA29SS27 should be included in exploratory excavation EE044.

Response: Removal of PCB contamination at these concentrations would be inconsistent with recommendations for no further investigations made for PA-51 sites with similar concentrations and risk levels.

Comment 22: PA-29 Building 280. Boring B042 should be relocated closer to PA29SW29.

Response: Potential soil contamination at PA29SW29 is being addressed as part of the Volume I recommendations. Relocation of boring PA29B042 to this area would leave a gap in characterization of the southeast corner of the Buildings 241/279/280 area.

Comment 23: PA-29 and PA-30 Buildings 217, 241, 279, and 280. Groundwater samples should be collected from each boring location in this area. Based on the analytical results, monitoring wells should be installed. Groundwater should be analyzed for volatile organic compounds, phenols and PAHs.

Response: As discussed at the data presentation meeting, no groundwater is anticipated in the Buildings 217, 241, 279, 280 area. If groundwater is encountered, grab samples will be collected and monitoring wells will be installed and sampled.

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Table 1
Summary of Analytical Results for Soil Sample Collected East of Building 270
(PA28SS150)
Hunters Point Annex
San Francisco, California

ORGANICS	CONCENTRATION (mg/kg)	Detected Value Exceeded HBLc at 10-6	Detected Value Exceeded HBLn
Trichloroethene	0.005		
Methyl Ethyl Ketone	0.014		
Xylenes	0.015		
Aroclor 1260	0.18	X	
TPH-Diesel	1500		
TOG	16,000		X
INORGANICS			
Copper	6086.48 (IAL = 110)		
Lead	643.67 (IAL = 14)		X
Mercury	8.84 (IAL = 4.5)		
Zinc	1875.65 (IAL = 120)		

Notes:

All detected organics are reported; only inorganics exceeding interim ambient levels (IALs) for HPA are presented.
mg/kg = Milligrams per kilogram
HBLc = Carcinogenic health based level
HBLn = Noncarcinogenic health based level
X = Exceeds HBLc or HBLn for one or more receptor populations