Arc Ecology

833 Market Street, #1107
San Francisco, CA 94103
415-495-1786

August 30, 2000

Mr. Richard Mach
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

RE: Draft Action Memorandum: Time Critical Removal Action for Steam Lines, and non-VOC Soil Sites at Parcels C and D, Hunters Point Shipyard, dated July 31, 2000

We support the proposed removal actions, and agree with the cleanup goals proposed on table 2 only as they apply to human receptors. We are concerned that the Navy ignored potential for HPS contaminants to foul surface, storm-, and groundwater, and harm ecological receptors.

PRGs are not calculated to include potential for contaminants to move to surface or groundwater and should not be assumed to be protective of these resources. PRGs do not address the potential for contaminated soil to affect offshore sediments, and thus offshore ecological resources. The Navy needs to address whether the proposed cleanup levels, particularly those that apply to industrial/commercial areas, will protect groundwater and off-shore ecological resources.

PRGs apply only to human receptors. It cannot be assumed that levels protective of humans will also protect ecological receptors. We understand that the Navy did not assess ecological risk at Parcels C and D because the Navy feels that no suitable habitat exists to support ecological resources. We disagree with this position. The Navy should compare proposed soil cleanup goals, particularly industrial cleanup goals, to soil concentrations with the potential to contribute to ecological risk. For example, the Draft Final Protective Soil Concentrations Technical Memorandum for Parcel E at Hunters Point Shipyard (dated March 14, 2000) reports "protective soil concentrations" for Parcel E, based upon site-specific soil and tissue concentrations, orders of magnitude above proposed industrial cleanup goals (Table 1).

Table 1: Comparison of cleanup goals for chemicals of ecological concern at HPS

Contaminant	Protective Concentration (mg/kg)[1]	Removal Action Industrial Cleanup Goal (mg/kg)[2]	Removal Action Residential Cleanup Goal (mg/kg)[2]
Cadmium	4	810	4
Copper	1,084	76,000	160
Lead	442	1,000	221
Nickel	1,941	41,000 [3]	320 [3]
Selenium	2	10,000	140
Zinc	719	100,000	370

1 Reported on page 7-1 of the Draft Final Protective Soil Concentrations Technical Memorandum, March 14, 2000
2 Reported on Table 2 of the Time-Critical Removal Action Proposal
3 Cleanup goal is based upon HPAL (as calculated in the field) or PRG, whichever is greater.

We understand that this Time-Critical Removal Action proposal does not address Parcel E. Yet the majority of the habitat described on Parcel E also is found on Parcels C and D. Not all of Parcels C and D are paved, nor can the Navy assume that all paved areas will remain paved. It can, therefore, be assumed that similar receptor species could inhabit Parcels C and D, namely the American kestrel and red-tail hawks as a representatives of raptors, and the American house mouse as a representative of omnivorous small mammals.

The Administrative Record for this proposed action should include correspondence from the community and RAB minutes or transcripts as appropriate.

Yours sincerely,

Christine Shirley
Staff Scientist

Cc: Claire Trombadore (SFD 8-1), USEPA, Region IX
Chein Kao, DTSC
Brad Job, RWQCB