

This enclosure transmits comments from City staff and technical consultant Treadwell & Rollo on the following document:

- Draft Action Memorandum, Time-Critical Removal Action (TCRA) for Steam Lines, Fuel Lines, and Non-Volatile Organic Compound Soil Sites at Parcels C and D, Hunters Point Shipyard, San Francisco, California, prepared by Tetra Tech EM Inc. for the Department of the Navy, dated July 31, 2000.

#### General Comments

1. How will disposal characterization data that exceed a chemical of concern (COC) trigger value, previously not identified as a COC based on pre-excavation delineation data, be used to reevaluate pre-excavation delineation COCs, as well as potentially expanding the size of individual excavations?
2. Will new soil and groundwater data and field observations generated during the Final Phase I Groundwater Data Gap Investigation be evaluated to identify additional sites that were not identified in the TCRA Steam & Fuel Lines, and Non-VOC sites study?
3. Will Dry Dock 4 Culvert remediation activities be performed as part of this TCRA? If not, when does the Navy plan to resume work at the Dry Dock 4 culverts?

#### Specific Comments

##### **1. 1.0 Purpose (p. 1)**

Reference is made to producing “Delineation Reports” for each Parcel C & D as a result of pre-excavation confirmation soil samples collected to delineate TCRA Steam and Fuel Line Removal and Non-VOC Soil Sites. Under what FFA document cover will the delineation reports be submitted for review and comment purposes? What will be the review and comment schedule for these delineation documents?

##### **2. 1.0 Purpose (p. 1)**

Reference is made to “Additional CERCLA documentation will follow this action...” What specific CERCLA documentation is anticipated?

##### **3. 2.1.4 Release or Threatened Releases (p. 3)**

Reference is made to approximately 20,500 feet of steam line that will require removal. It is reported that the steam lines were used extensively for waste oil conveyance or disposal. In

addressing the steam line removal and underlying soil evaluation, how does work described under this TCRA Memo align with or supplement cleanup and evaluation as required per the Petroleum Corrective Action Plan?

**4. 5.1.2 Contribution to Remedial Performance (p. 6)**

Reference is made to "...excavations will be backfilled using clean fill and graded appropriately." Please reference what "appropriately" means? Is there a set of standards to reference by which the Navy performs all backfill activities, i.e. source of backfill, compaction requirements, laying down of an in-hole demarcation to indicate where clean fill was placed?

**5. 3.2 Threats to the Environment (p. 5)**

This paragraph states, in part, "Parcels C and D are typical industrial sites containing buildings and paved areas not suitable as habitat for terrestrial ecological receptors." However, contaminated soils on Parcels C and D may act as source areas for groundwater contamination, which is expected to generally flow towards San Francisco Bay once the potential conduits for groundwater diversion, including steam and fuel line corridors, are removed. At that time, impacted groundwater may flow into the Bay with contaminant concentrations that are harmful to aquatic receptors. Since both Parcels C and D are adjacent to the Bay, this paragraph should address the issue of potential future threats to adjacent aquatic ecological receptors in the Bay.

**6. 5.1.1 Proposed Action Description (p. 5)**

Suggest reordering the bullet items so that the current first bullet item, "Clean and dispose of steam lines and fuel lines" comes after the following two bullet items, "Remove steam lines from utility corridors" and "Remove fuel lines."

The first paragraph on page 1 states, in part, "Additional soil sites may also be incorporated if hazardous substances, pollutants or contaminants ... are encountered during ... aboveground (AST) and underground (UST) pipeline removals at Parcels C and D." Therefore add a new bullet item after the current fourth bullet item in section 5.1.1: "Collect confirmation samples at AST/UST pipeline removal areas".

The fifth bullet states, "Collect pre-excavation confirmation soil samples to delineate the excavation boundaries at soil sites." A Field Sampling Plan (FSP) and Quality Assurance Project Plan (QAPP) are required for the pre-excavation confirmation sampling activities. Even if the general methodology currently being applied at Parcel B will be applied to Parcels C and D, a detailed sampling plan is required, including figures showing proposed sampling locations.

Another bullet item needs to be inserted after the current sixth bullet item: “Collect and analyze confirmation samples for steam line, fuel line, AST/UST pipeline, and soil excavations.” An FSP and QAPP are also required for the post-excavation confirmation sampling; new plans may be developed or existing plans may be referenced.

**7. 5.1.4 Applicable or Relevant and Appropriate Requirements (p. 7)**

In the third paragraph, third line, the word “citing” should be changed to “siting.”

**8. Table 1: Parcels C and D Non-volatile Organic Compound Soil Sites**

There are a number of excavations on Parcels C that, during the course of the June 29, 2000 BCT meeting, were identified as requiring more sampling before a determination of “further action” or “no further action” can be made. The status of these excavations is unclear from this document. However, the Proposed Action Description (p. 5) includes the following item (fifth bullet):

- Collect pre-excavation confirmation soil samples to delineate the excavation boundaries at soil sites. Results of the pre-excavation confirmation sample analyses will be documented in delineation reports for each parcel.

Based on this statement, it is unclear why the following Parcel C excavations are not included in Table 1:

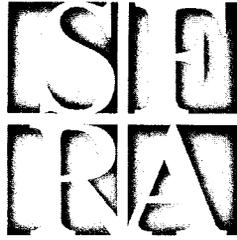
IR	Excavation
IR-28	<ul style="list-style-type: none"> <li>• 28-2 (borings IR28B279 and IR28B280)</li> <li>• 28-17</li> <li>• DM8334</li> </ul>
IR-58	<ul style="list-style-type: none"> <li>• DM8130</li> </ul>

It seems appropriate to include the confirmation sampling for the above excavations in the scope of work for this TCRA.

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Subject: Comments – Draft Action Memorandum, TCRA for Steam & Fuel Lines, and Non-VOC Soil Sites at Parcels C & D.

Dear Mr. Mach:

Enclosed are the City and County of San Francisco's comments on *the Draft Action Memorandum, Time-Critical Removal Action for Steam Lines, Fuel Lines, and Non-VOC Soil Sites at Parcels C and D, July 31, 2000.*

The City appreciates the opportunity to comment on this document.

Sincerely,

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