

**San Francisco
Redevelopment Agency**

770 Golden Gate Avenue
San Francisco, CA 94102

415.749.2400
TTY 415.749.2500



**N00217.000163
HUNTERS POINT
SSIC NO. 5090.3**

City of San Francisco
Kathryn C. Palamountain
Darshan Singh
Lynette Sweet
Benny Y. Yee

James B. Morales, Executive Director

450-03100-190

August 28, 2000

Richard G. Mach, Jr., P.E.
BRAC Environmental Coordinator
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Dear Mr. Mach:

The City has reviewed the Navy's July 21, 2000 letter and attachments regarding its recommendations for cleanup levels at soil sites in Parcel C. The City has the following comments. In general, the parcel must be cleaned up to meet the uses in the City's Reuse Plan, unless such cleanup is technically infeasible under CERCLA. The Navy has not stated that technical infeasibility is an issue with any of the sites in Parcel C. Except as stated in this letter, we agree with the Navy's classification of the sites as consistent with the uses as set forth in the Reuse Plan. However, the Navy will have to confirm that all sites within areas designated for residential use in the Reuse Plan have been cleaned up to an unrestricted residential standard in its closeout report, which we understand will include a survey (based on the map the City provided to the Navy).

Following are our specific comments.

Remediation Area 28-2. This area is within the soil vapor extraction (SVE) treatability study area. The Navy proposes cleanup to an industrial level. As currently delineated, this area is primarily within an area designated as Educational/Cultural in the City's Reuse Plan. However, the contamination could possibly extend into an adjacent Research & Development (R&D)-designated area, which may include residential uses. The City believes that any portions of this site that actually extend into the R&D area must be cleaned up to a residential standard. We understand and acknowledge that, contaminant levels may be reduced through SVE efforts and are supportive of the Navy's proposal to re-evaluate the area once the SVE study is completed.

Remediation Area 28-18. This area is shown as on the border between areas designated as Educational/Cultural and R&D. If, after pre-excavation delineation or at anytime in the cleanup process it is determined that the contamination spreads into the R&D area, that portion must be cleaned up to be consistent with the Reuse Plan. Otherwise, the City concurs with an industrial standard.

Richard G. Mach, Jr., P.E.
BRAC Environmental Coordinator
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
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Remediation Area 28-21. This area is shown to be on the border of a Mixed Use area and an Open Space area. The Navy proposes to use pre-excavation delineation to establish a reuse goal for residential/industrial. We assume that the Navy is proposing to cleanup that portion of the area that is in the Mixed Use-designated area to residential and the remaining portion to industrial. If this is the case, the City has no objection.

De Minimus Area 8944. This area is shown to be almost wholly within a Mixed Use-designated area. It must, therefore, be cleaned up to allow residential use consistent with the Reuse Plan.

Remediation Area 58-4. The Navy proposes cleanup to an industrial level. As currently delineated, this area is immediately adjacent to an area designated as Mixed Use in the City's Reuse Plan. In order to provide an adequate buffer zone of protectiveness for the Mixed Use area, the City believes that those portions of the remediation area west of the mid-way point of the planned street must be cleaned up to a residential standard. The mid-way point is identified on a map the City provided to the Navy (attached). The City suggests that this site be treated the same as remediation area 28-21; the Navy should use pre-excavation delineation to establish the reuse goal for residential/industrial.

Unidentified DM. There is a marker adjacent to DM 9336 showing another DM area, but the marker is not labeled on the map. Please provide the number of the area and its proposed standard.

If you have any questions, please call me at (415) 749-2502 or Ms. Rona Sandler, Deputy City Attorney at (415) 554-4690.

Sincerely,



Byron A. Rhett
Senior Project Manager
Hunters Point Shipyard

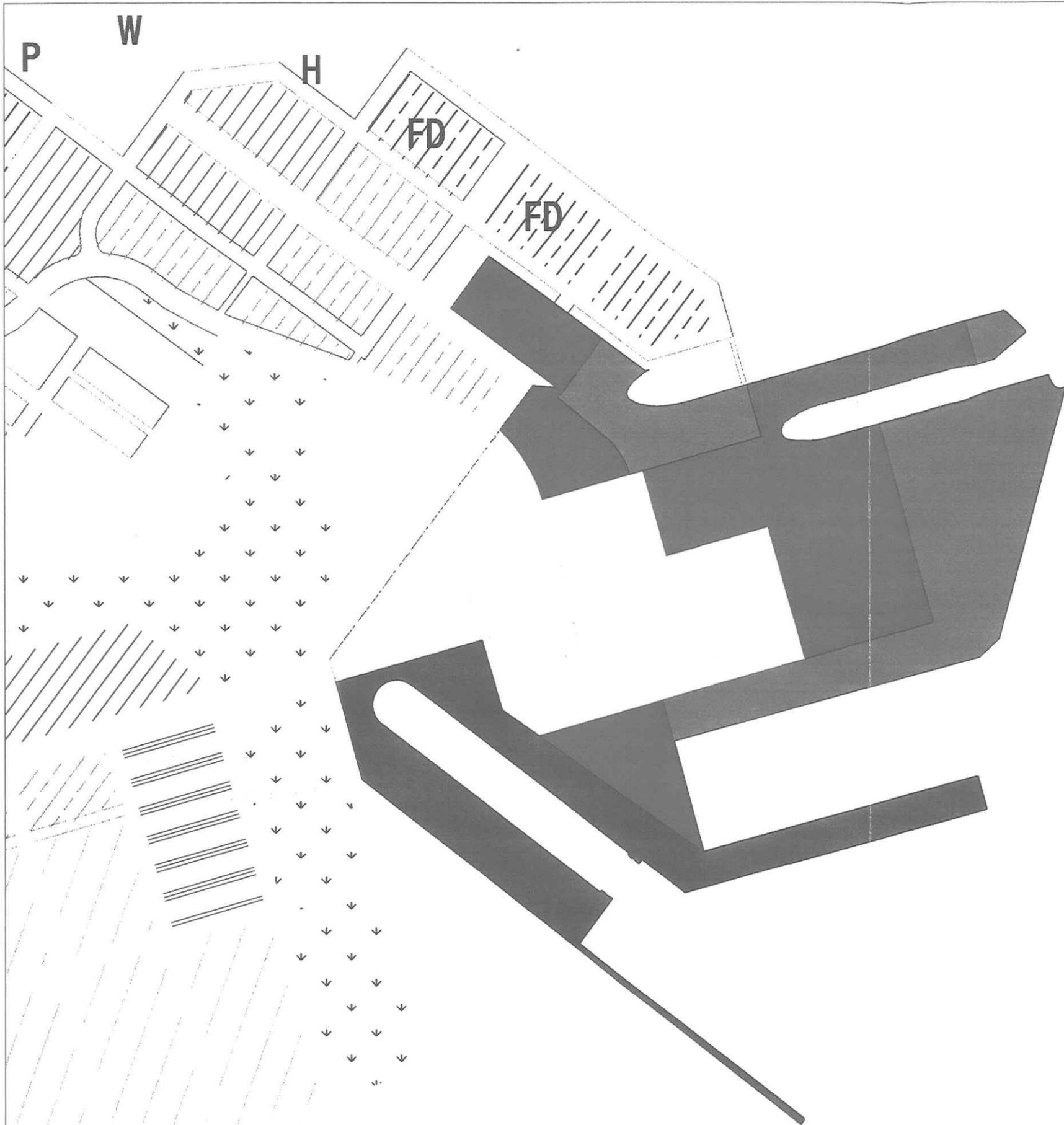
Attachment

cc: Rona Sandler, CAO
Claire Trombadore, EPA
Chien Kao, DTSC
Brad Job, RWQCB

ATTACHMENT

RECOMMENDATIONS FOR CLEANUP LEVELS
AT SOIL SITES

DATED 28 AUGUST 2000



PARCEL C LAND USE

- Research & Development
- Mixed Use
- Educational/Cultural
- Maritime Industrial
- Open Space