

The following are City and County of San Francisco comments to the *Draft Final Parcel B Petroleum Hydrocarbon Corrective Action Plan, August 11, 2000*. As a general matter, we believe that the document fails to address several significant issues and fails to define the process that will be used to obtain closure. We recommend that the process be similar to the CERCLA process to the extent possible, especially with respect to City and community input and approvals.

General Comments

1. Will the proposed soil and groundwater remedial alternatives recommended by Regional Board staff under this CAP be subject to public notice, review, and Regional Board approval? How will the final remedy be approved and publicly noticed? How will the Regional Board provide final "sign-off"? The City suggests that the CAP be publicly noticed and put on the Regional Board's agenda to ensure adequate notice and public comment.
2. The CAP contains no schedule, no timeline, and no discussion of next steps.
3. Along these same lines as question No. 1 above, how will the Navy obtain regulatory concurrence that all above and underground tanks have been successfully closed? Such concurrence must be in writing.

Specific Comments

1. Appendix C, Technical Memorandum Groundwater Free Product Removal Activities, Table 1

This comment addresses information contained in the Draft Technical Memorandum of July 2000, included in this CAP as Appendix C. Well survey comments in Table 1 reference detection of VOCs and a sheen in well PA24MW303A. This well is located within the Tidally Influenced Zone bay-ward of the Point of Compliance demarcation. What VOCs were detected, and where is this information reported?

2. Page 2-4

On pages 2-4, and 3-4 the CAP references the RAMP as the process to address 1) groundwater discharges to Bay (p2-4), 2) contaminant levels (p2-4), and 3) groundwater monitoring (p3-4). Is it the intent to use the RAMP to address TTPH concentrations and monitoring? If so, given that the RAMP is a CERCLA document, how does it monitor TTPH?

3. Page 4-8, 4.5.1 Total Petroleum Hydrocarbon Contamination In Soil

Navy proposes no cleanup of soils below groundwater table or "next to a permanent barrier". Is this consistent with the Regional Board's low risk policy? Have these sites been evaluated or simply disregarded?

4. Page 3-6, 3.3.2 Groundwater Remediation Strategy

The City's Reuse Plan shows wetlands in the IR's 7 and 26. The CAP contains no discussion of wetlands or whether the proposed cleanup standards are suitable for wetlands. The CAP cites an Ecological Reference Value, is this value suitable for evaluating wetland flora and fauna viability? Are the screening level criteria proposed in this CAP (3,500 mg/kg for soil, and 1.4 mg/l groundwater) protective of wetland flora and fauna?

5. Page 4-8, 4.5 Extent of TPH Contamination

At the top of Page 4-8 it states that several areas of TPH contamination are "outside base property." Please clarify what this means and identify the areas outside of base property where TPH contamination has been identified.

6. Page 6-5, 6.2 Remedial Alternatives For Groundwater

Page 6-5 states that for natural attenuation, the following must be done: estimate time frame to assess whether natural attenuation will meet with agency and state acceptance; initial modeling to estimate the future extent of the plume and quantification of groundwater flow and solute transport and transformation process; extensive site characterization to refine the model; performance monitoring to evaluate effectiveness of natural attenuation and to detect any expansion or migration of the plume; and possible development of a contingent remedy. None of these is addressed in the CAP. Given that this is the preferred option recommended by the Navy, when and where will they be addressed?

7. Page 2-4, 2.5 Potential Groundwater Use

Page 2-4 states that the only beneficial use for groundwater in parcel B is preservation of saltwater aquatic life as groundwater is discharged into the Bay. Is this consistent with the Basin Plan? Which basin is Parcel B in? For the Islais Valley basin, both municipal and domestic water supply and agricultural water supply are potential uses and industrial process water supply and industrial service water supply are existing uses. Please provide a full and accurate discussion regarding beneficial uses and cite the Basin Plan.

8. Page 3-3, Guidance on Required Cleanup at low Risk Fuel Sites

Navy states that the groundwater in parcel B has been reclassified. What is the new groundwater resource classification at Parcel B? What review process has been undertaken to reclassify the groundwater basin underlying Parcel B?

9. Page 6-4, 6.2 Remedial Alternatives For Groundwater

Reference is made to low likelihood of TPH impacting the Bay for several reasons, one of which is the existence of a "low permeability" wooden sea wall. Has the sea wall been evaluated to support the assertion that it is low permeability barrier? Often old sea walls have localized areas of deterioration where significant discharges may happen.

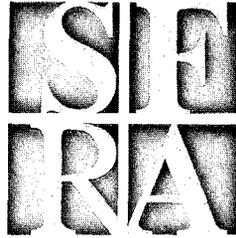
10. Page 7-1, 7.0 Remedial Alternative Recommendations

Immunoassay test kits are proposed for confirming the 3,500 mg/kg soil criteria is met at the seven soil source excavations. Do the test kits provide the reliability, accuracy and precision necessary to confirm TPH concentrations greater or less than 3,500 mg/kg? Are the kits Regional Board approved and routinely allowed for confirmation sampling at other TPH cleanup sites?

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Subject: Comments – Draft Final Petroleum Corrective Action Plan, Parcel B

Dear Mr. Mach:

Enclosed are the City and County of San Francisco's comments on *the Draft Final Parcel B Petroleum Corrective Action Plan, August 11, 2000*. The City appreciates the opportunity to comment on this document.

Sincerely,

A handwritten signature in black ink, appearing to read 'Byron A. Rhett', is written over the typed name.

Byron A. Rhett
Senior Project Manager
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Enclosure

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