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WRITER'S DIRECT LINE

OUR FILE NUMBER

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

Subject: Draft Action Memorandum, Time-Critical Removal Action for Steam Lines, Fuel Lines,  
and Non-Volatile Organic Compound Soil Sites at Parcels C and D, Hunters Point  
Shipyard, San Francisco, California

Dear Mr. Mach:

Enclosed are comments from Lennar/BVHP Partners on the above-referenced document.

Please call me at (415) 774-2946 if you have any questions.

Very truly yours,



M. Elizabeth McDaniel

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Enclosures:

cc: Ms. Claire Trombadore EPA Region IX  
Ms. Sheryl Lauth EPA Region IX  
Mr. Chein Kao DTSC  
Mr. Brad Job RWQCB  
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Mr. Jessie Blout  
Mr. Roy Willis

**LENNAR /BVHP COMMENTS ON THE DRAFT ACTION MEMORANDUM, TIME-CRITICAL REMOVAL ACTION FOR STEAM LINES, FUEL LINES, AND NON-VOLATILE ORGANIC COMPOUND SOIL SITES AT PARCELS C AND D, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA**

This letter provides you with Lennar/BVHP Partners comments on the subject document.

Additional information should be provided regarding the procedures for the cleaning and removal of steam lines and fuel lines. The document does not discuss the procedures that will be followed to clean and remove the lines and what precautions will be taken to keep additional releases of any remnant contaminants within the lines from occurring during the cleaning and removal activities.

The sequence of the proposed action listed in Section 5.1.1 is unclear. For example, the first bullet states, "Clean and dispose of steam lines and fuel lines". Disposal of the lines is listed before removal of the lines in the second and third bullets. The fifth bullet states, "Collect pre-excavation confirmation soil samples to delineate the excavation boundaries at soil sites." This action should precede removal of the lines.

Additional information should be provided regarding the proposed sampling program. The document should describe and/or illustrate the locations for pre-excavation and confirmation soil sampling, the spacing between sampling locations, the depth of sampling locations, and the analytical program for each sample, including quality assurance/quality control procedures.