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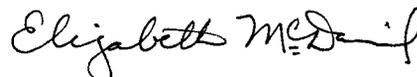
Subject: Field Sampling Plan and Quality Assurance Project Plan, Phase I  
Groundwater Data Gaps Investigation, Hunters Point Shipyard, San  
Francisco, California

Dear Mr. Mach:

Enclosed are comments from Lennar/BVHP Partners on the above-referenced document. As noted in a voice mail message from Dave DeMars on August 10, 2000 to Don Bradshaw of LFR Levine-Fricke, attorneys for Lennar/BVHP Partners received these documents late. We have prepared these comments as soon as possible given the late receipt, and we trust the Navy will consider these comments.

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  
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Mr. Jessie Blout  
Mr. Roy Willis

LENNAR /BVHP COMMENTS ON THE FIELD SAMPLING PLAN AND QUALITY ASSURANCE PROJECT PLAN, PHASE I GROUNDWATER DATA GAPS INVESTIGATION, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

This document provides you with Lennar/BVHP Partners comments to the above-referenced document.

Lennar's primary comment is regarding the delineation of groundwater contaminant plumes to confirm the boundaries of the revised ecological and human health remedial units (RU) shown on Figures 4-2 through 4-5. The proposed groundwater sampling program will not provide sufficient data to adequately delineate the horizontal and vertical extent of certain plumes at Parcels C and D. Additional groundwater sampling should be conducted outside of the depicted boundaries of the RUs to confirm that the plumes do not extend outside of those boundaries.

Section A.1.3.3 states, "the Navy developed revised groundwater RUs, based on groundwater monitoring wells with historic concentrations that exceeded drinking water standards or ambient groundwater levels, and proposed these areas for further evaluation." This basis for development of the RUs does not account for plume migration since the wells were last sampled. The RUs at Parcels C and D were developed on the basis of limited chemical data collected more than 4 years ago. In addition, the basis for development of the RUs did not account for areas where groundwater monitoring wells are not present. Additional wells should be installed and sampled in areas outside of the RU boundaries where no wells are present or currently proposed. The purpose of the recommended additional well installation and sampling is to better define the lateral and vertical extent of contamination near each RU.

Specific areas that should be addressed are listed below.

Figure 4-2: Parcel C Wells for Resampling to Confirm Extent of Remedial Units

- Well IR28MW313F (near RU-C7) should be sampled and analyzed for volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH)
- Well IR29MW85F (near RU-C7) should be sampled and analyzed for VOCs and TPH
- Well IR29MW58F (near RU-C7) should be sampled and analyzed for VOCs and total petroleum hydrocarbons TPH
- Well IR29MW56F (near RU-C7) should be sampled for VOCs, in addition to TPH

Figure 4-3: Parcel D Wells for Resampling to Confirm Extent of Remedial Units

- Well IR09MW36A (near RU-D1) should be sampled and analyzed for metals
- Well IR09MW37A (near RU-D1) should be sampled and analyzed for metals
- Well IR09MW38A (in RU-D1) should be sampled and analyzed for metals
- Well IR09MW39A (in RU-D1) should be sampled and analyzed for metals
- Well PA50MW12A (near RU-D1) should be sampled and analyzed for metals
- Well IR36MW16A (near RU-D1) should be sampled and analyzed for metals
- Well IR44MW08A (near RU-D1) should be sampled and analyzed for metals
- Well IR33MW63A (near RU-D1) should be sampled and analyzed for metals

- Well IR09P040A (near RU-D1) should be sampled and analyzed for metals
- Well IR09P041A (near RU-D1) should be sampled and analyzed for metals
- Well IR33MW116A (near RU-D1) should be sampled and analyzed for metals
- Well IR09MW45F should be sampled and analyzed for metals

Figure 4-4: Parcel C Locations for New A- and B-Aquifer Wells

- Wells screened in the A- and B-Aquifer should be installed west of Building 231 (west of RU-C1) and sampled for VOCs and TPH
- Wells screened in the A- and B-Aquifer should be installed near the middle of the western portion of building 253 (southwest of RU-C1) and sampled for VOCs and TPH
- Wells screened in the A- and B-Aquifer should be installed near the southeastern corner of building 228 (east of RU-C4) and sampled for VOCs and TPH

Figure 4-5: Parcel D Locations for New A- and B-Aquifer Wells

- Wells screened in the A- and B-Aquifer should be installed between Buildings 407 and 439 (west of RU-D1) and sampled for metals
- A well screened in the A-Aquifer should be installed east of Building 401 (west of RU-D1) and sampled for metals
- A well screened in the A-Aquifer should be installed south of Building 402 (east of RU-D1) and sampled for metals
- Wells screened in the A- and B-Aquifer should be installed in the vicinity of well PA33MW36A (identified on Figure 4-3) east of RU-D1 and sampled for metals

Regarding the wells that are not available for sampling listed in Table 4-1, additional information should be provided. Have the wells that are listed as abandoned been properly removed and sealed? Have there been efforts to rehabilitate wells that are silted more than 50 percent, to find wells that have not been located