



California Regional Water Quality Control] San Francisco Bay Region

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HUNTERS POINT
SSIC NO. 5090.3



Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov>
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 FAX (510) 622-2460

Commanding Officer
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
San Diego, Ca 92132-5190
Attention: Mr. Richard Mach

October 31, 2000
File 2169.6032 (LBJ)

**Subject: Comments on Technical Justification for the Parcel B-F Interface Beach
Armorization Conceptual Design, Hunters Point Shipyard, San Francisco, CA.**

Dear Mr. Mach:

Regional Board staff has reviewed the document titled Technical Justification for the Parcel B-F Interface Beach Armorization Conceptual Design dated October 19, 2000. As you are aware, we strongly support the Navy's efforts to abate the potential for continued erosion of contaminated soil from the upland portion of the site. However, we believe that it is necessary for the Navy to demonstrate that the proposed lateral extent of the shoreline erosion control measures (shoreline armor) is adequate. While we concur with the general design, we believe that the Navy should present the available data, and if necessary, collect and analyze additional soil samples, to show that shoreline soils that are not contained under the proposed shoreline armor will not adversely impact San Francisco Bay. Our recommendation would be that the proposed shoreline armor be extended laterally to contain all soil on Parcel B that exceeds the Regional Board's calculated Bay ambient concentrations.

Since this approach represents a containment remedy, it will be necessary for the Navy to demonstrate with ongoing monitoring that the shoreline armor is adequately abating the migration of pollution from the site and that the remedy will continue to function properly into the foreseeable future. We also anticipate that institutional and management controls will be necessary to ensure that the shoreline armor will not be disturbed unless appropriate mitigation measures are implemented first. We anticipate that these additional details will be addressed in forthcoming design documents and work plans.

We appreciate the efforts of the individuals involved in this project and look forward to resolution of our comments. Should you have any questions, please contact me at (510)-622-2400.

Sincerely,

Brad Job, P.E.
Water Resources Control Engineer

Mr. Richard Mach

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October 31, 2000

cc:

Ms. Claire Trombadore (SFD-8-2)
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Ms. Sheryl Lauth (SFD-8-2)
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Mr. Chein Kao
Department of Toxic Substances Control
Northern California Region
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Mr. John Chester
San Francisco Department of Public Health
1390 Market Street, Suite 910
San Francisco, CA 94102

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