



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

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HUNTERS POINT
SSIC NO. 5090.3

5090
Ser 06CH.RM/0249
March 16, 2001

Ms. Claire Trombadore (SFD 8-3)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

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

Mr. Brad Job
California Regional Water Quality Control Board, San Francisco Bay Region
1515 Clay Street, #1400
Oakland, CA 94612

Dear BCT members:

The purpose of this letter is to state the Navy's position regarding six issues related to the Parcel B record of decision (ROD), Hunters Point Shipyard. A preliminary legal opinion on each of these issues was provided to you last week from our office of legal counsel. The Navy is asking for a response to our position by March 24, 2001 so we can determine which issues may require input from management, so as to minimize any delays to completing the Parcel B remedial action. A tentative management meeting is planned for the first week of April 2001, with April 2, 2001 being the currently proposed date.

Parcel B/F boundary:

The Navy has been implementing the remedial design sampling plan over the past several months. There are several remedial areas designated for excavation, where the contamination extends to the shoreline and appears to be buried beneath an old, buried riprap layer. The Navy is concerned that excavation of these areas using traditional excavation methods will result in the potential release of contaminated material to the off shore Parcel F areas of concern. The Navy is further concerned that attempting to meet the current ROD objectives through engineering controls of the shoreline (i.e. construction coffer dams to contain excavated material) would be excessively costly, add no additional protection to human health and the environment, and risk completion of several other scheduled projects on the base. The Navy proposes preparing an explanation of significant differences (ESD) to adjust the Parcel B/F boundary inland of the areas of concern. The Navy would further commit to working with the agencies to evaluate the federal facility agreement (FFA) to add a non-time critical removal action (NTCRA) under Parcel F to immediately address these areas of concern along the shoreline.

Building 123 Soil Vapor Extraction (SVE) alternative:

The Navy has been evaluating the potential connection of the volatile organic compounds (VOC) at installation restoration (IR) site 10 (IR-10) in Parcel B with IR-25 in Parcel C. During this evaluation, a soil gas survey (transect) was completed and two demonstration SVE systems were constructed (one in Building 123 in IR-10 and the other in Building 134 in IR-25). The soil gas survey has demonstrated that the two VOC areas are not connected. The bounds of the VOC area within IR-10 have also been defined. The SVE system in IR-10 has preliminarily proven to be very effective in the removal of VOCs from the IR-10 demonstration area. Based on these results, the Navy would like to expand the SVE system in IR-10 to complete the remediation of the area. SVE was evaluated in the feasibility study (FS) and ROD. The Navy proposes an ESD to allow SVE to treat the VOCs at IR-10. This proposed change is considered minor as it only addresses two of the 103 soil remediation areas, as well as the other justifications outlined in our counsels draft opinion.

Manganese:

Manganese is a naturally occurring metal, which occurs in sporadically high concentrations throughout the chert and basalt formations in the California Coastal Ranges. Manganese also occurs at very low concentrations in serpentinite and other sediment material. The Navy calculated a previous ambient manganese concentration, which addressed all of the samples collected. The Navy believes that ambient level to be skewed low due to the excessive number of samples from the serpentinite and sediment sample locations. The Navy has proposed supplemental manganese ambient values along with a procedure for evaluating when to apply these supplemental values in a technical memorandum. The Navy recommends the agencies approve these supplemental values and screening criteria. Once approved, the Navy proposes an ESD to adjust the manganese cleanup levels to be consistent with the technical memorandum.

Exploratory Excavations:

During the completion of the ROD, there were five exploratory excavations being performed as removal actions. To account for these actions, the ROD stated that any of these sites, which achieved the ROD cleanup goals, would be addressed in a future ROD. Two of the sites are being further addressed as remedial areas under the current remedial action. The other three sites met the ROD cleanup goals. The Navy proposes an ESD to address the three sites, which have met the ROD cleanup goals. These sites will then be addressed in the construction summary and remedial action reports.

IR-25 boundary:

The IR-25 boundary was removed from Parcel B as part of the finalization of the ROD. The exact boundaries of this carve out were not specifically defined. Through additional site evaluation, the boundary now appears to be slightly larger than the figures in the ROD. The Navy proposes a single line explanation in an ESD and a memorandum to the administrative record file to define the exact boundary between Parcels C and B.

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Groundwater Point of Compliance:

The ROD defines the groundwater point of compliance to be at the high tide line of the tidally influence zone. This term contradicts itself, in that the high tide line and the tidally influenced zones are at different locations. The Navy proposes an ESD to define the point of compliance to be two feet inland of the high tide line. The Navy will then define the monitoring requirements in a remedial action monitoring plan (RAMP) revision to ensure that groundwater does not exceed the cleanup goals at the point of compliance.

Should you have any concerns with this matter, please contact the undersigned at (619) 532-0913.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard G. Mach Jr.', written over a horizontal line.

RICHARD G. MACH JR., P.E.
BRAC Environmental Coordinator
By direction of the Commander

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