



Department of Toxic Substances Control



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HUNTERS POINT
SSIC NO. 5090.3

June 27, 2001

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

NAVY'S PROPOSAL TO RESOLVE THE INFORMAL DISPUTE REGARDING MANGANESE IN PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Dear Mr. Mach:

Thank you for your letter dated June 20, 2001, regarding the Navy's proposal to resolve the informal dispute for manganese sites in parcel B. California Department of Toxic Substances Control (the Department) is in general agreement with the Navy in evaluating the remaining Parcel B manganese sites in question by using an average concentration within a reasonable size of area. With only one contaminant in question, we consider this is equivalent to evaluating an area risk which was used in the original risk assessment. We would, however, like the Navy to provide the following additional information before we can decide which of the remaining Parcel B manganese sites need further excavation.

1. The Navy should provide sample I.D., concentration, depth, multipliers for weighted composite samples, sum of concentrations, number of sample equivalents, and site areas, in a tabulated form, for each average concentration calculated.
2. Average concentrations should be calculated for an area no greater than the original risk assessment grid size under a residential use scenario (i.e., no bigger than 2500 square feet).
3. Every composite sample should be weighted based on the number of locations from which the composite sample was collected.

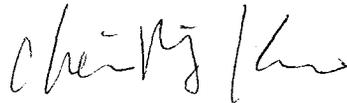
The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

4. Confirmation samples should be collected according to procedures prescribed in the Final Parcel B Remedial Design Amendment. All data collected from any soils that still remains on a site should be used in the calculation of average concentrations.

After the Navy submits the revised average concentrations, the Department will be able to decide whether any of the 18 excavation areas need further excavation. We want to emphasize that this is intended to resolve the current dispute surrounding the manganese issue. We will further evaluate the overall residual risks at the submittal of Construction Summary Report to determine if the remediation for Parcel B is completed for its intended use.

If you have any questions, Please contact me at (510) 540-3822.

Sincerely,



Chein Ping Kao, P.E.
Senior Hazardous Substance Engineer
Office of Military Facilities

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