

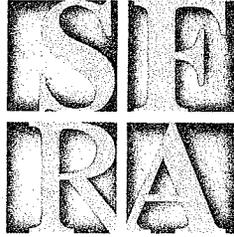
San Francisco
Redevelopment Agency

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BRAC OFFICE

2001 DEC 17 A 8:14



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November 30, 2001

450-04301-190

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

**Subject: Parcel D Time Critical Removal Action Closeout Report dated
September 28, 2001**

We have reviewed portions of the subject document and we are transmitting our comments in this letter.

General Comments

1. We agree with and support the USEPA comments dated November 8, 2001. We are not repeating any specific comments that they may have written, even though we may have the same concerns.
2. The BCT and the public have not approved the details of the Buffer Zone including the size, depth and cleanup levels. In fact, the City has objected to the two-foot depth of the buffer zone in at least one previous comment letter and in several meetings. The USEPA also objected to the two-foot depth in at least one project meeting that we attended. The use of a two-foot deep residential cleanup in the Buffer Zone may be burdening the City and any future property owners with an institutional control that will be difficult, if not impossible, to implement.

If the Buffer Zone details are not approved as the Navy has presented, then all the Buffer Zone cleanup areas will have to be revisited. Please propose a process for getting approval of the details of the Buffer Zone.

Richard Mach
November 29, 2001

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3. We are concerned about the Navy's use of the Supplemental Manganese Ambient Level (SMAL) as a cleanup level. The SMAL has not been approved by the BCT. The Navy needs to resolve issues surrounding the scientific verification and procedure for using the SMAL. If the 10,000 mg/kg residential cleanup level SMAL is not approved, then all the sites where the SMAL was used will have to be revisited using the approved residential cleanup level.
4. If the SMAL is approved, then we are concerned that you are not implementing it correctly. There are many instances in this document where you refer to the SMAL, but there is no evidence of chert or basalt in the sample. Many of the boring logs where the SMAL is referenced do not list chert or basalt.

Specific Comments

1. On Figure 8-1, it is difficult to tell which areas of the excavation were excavated to ten feet deep and which areas were excavated to six feet deep. Please provide more explanation on the figure.
2. For Excavation 37-1B, we have many concerns related to use of the Buffer Zone and the SMAL (see general comments 2, 3 and 4). You need to get approval for the use of only a two-foot residential cleanup in the buffer zone. You also need to get approval for the use of the SMAL. If you do not get these approved, then there are many samples in this area that may need further cleanup for manganese. There are two samples, 3701E1B and 3701S1C, where chert or basalt are not listed in the boring logs, so they may not meet the SMAL criteria.
3. The text in 37-2 states that the soil was disposed at a Class I facility. What was the contaminant that caused the soil to have to be shipped to a Class I facility? Is there a contaminant of concern that was not investigated in this area?
4. For DM 6671, we have the same concerns about the Buffer Zone and SMAL. In addition, there are no boring logs for 6671N3A and 6671W1A, so we can not check for the presence of chert or basalt.

If you have any questions about these comments, please contact me at (415) 749-2464 or Amy Brownell, of the San Francisco Department of Public Health, at (415) 252-3967.

Sincerely,



A. Don Capobres
Project Manager
Hunters Point Shipyard Redevelopment Project Area

Richard Mach
November 29, 2001

450-04301-190

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