



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

N00217.000574
HUNTERS POINT
SSIC NO. 5090.3

January 17, 2002

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

Re: EPA Review and Comment, Pre-Final Explanation of Significant Differences, Parcel B, Hunters Point Shipyard, dated December 14, 2001

Dear Mr. Mach:

EPA has completed its review of the above-referenced document. Comments are provided in an attachment to this letter. As I noted at the BCT meeting of January 8, 2002, the Navy must revise the ESD to include additional detail and information regarding the shoreline protection remedy.

If you have any questions, please contact me at, 415-972-3013.

Sincerely,

A handwritten signature in cursive script, appearing to read "Claire", followed by a long horizontal flourish.

Claire Trombadore
Remedial Project Manager

cc: Keith Forman, Navy
Rich Pribyl, Navy
Dave Demars, Navy
Mike Wanta, TtEMI
Chein Kao, DTSC
Michael Rochette, RWQCB
Amy Brownell, City of SF
Karla Brasaemle, TechLaw
Christine Shirley, ARC Ecology

**Review and Comment of the Pre-Final Explanation of Significant Differences
Parcel B, Hunters Point Shipyard**

GENERAL COMMENTS

1. Little information is presented in the Pre-Final Explanation of Significant Differences (ESD) regarding what a “shoreline protection remedy” entails, hence, it is not possible to evaluate how protective of human health and the environment the remedy is. The Navy must revise the ESD to better describe the shoreline protection remedy and specify the technology or technologies to be used. Is it capping, containment, stabilization, encapsulation, a combination of these? Please discuss the actual remedy selected for the shoreline. The Navy should explain how the new remedy for the shoreline will be protective of both the environment (e.g., the Bay) and human health. Also, The Parcel B FS discusses containment remedies (see figure 3-11). It might be prudent to mention this in the ESD.
2. Please briefly present the nature and extent of remaining contamination along the shoreline in both the soil and groundwater at IR-sites 7 and 26. While Figure 1 and the text under Section 2 are helpful, there is not much detail. As written, the ESD is not clear about what the residual contamination at IR-7 and IR-26 is.
3. The Pre-Final ESD indicates that the approved remedy documented in the record of decision (ROD) would be too expensive to implement, though no cost estimates are provided to support this contention. Hence, it is not possible to evaluate the proposed remedy nor to evaluate whether the change in remedy is justified. Please present additional cost estimate information if available.
4. Because contamination will be left in place at IR-7 and IR-26 land use controls and long term monitoring will likely be required. Shouldn't this be discussed in the ESD?
5. The evaluation of the “shoreline protection remedy” under the nine criteria is inadequate because the specific technology(ies) are not specified and because there are no specific detail of how this remedy meets the nine criteria. The text simply states that the remedy will comply or that it will be effective. Some potential technologies, like rip-rap, would not necessarily be protective of human health and the environment. Please revise the evaluation of the nine criteria to reflect the specific technology(ies) that will be used.