



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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SAN DIEGO, CA 92108-4310

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HUNTERS POINT
SSIC NO. 5090.3.A

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Ser BPMOW.dg/1387
November 15, 2005

VIA CERTIFIED MAIL

Mr. Jim Ponton
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear Mr. Ponton:

Pursuant to meeting the Federal Facilities Agreement (FFA) schedule for the Feasibility Study for Parcel F, at Hunters Point Shipyard, we are hereby requesting that the Regional Water Quality Control Board (RWQCB), San Francisco Bay Region, as the lead agency for the State of California, identify potential State chemical-specific and location-specific "Applicable" or "Relevant and Appropriate" Requirements (ARARs) for the Feasibility Study for Parcel F.

In addition, the Navy is requesting that the State of California identify any other criteria, advisories, guidance, and proposed standards that the State requests be considered for the above site. Please coordinate responses from all California state agencies.

The Navy is requesting timely identification of potential State ARARs consistent with §121(d)(2)(A) of CERCLA and the National Contingency Plan 40 CFR §§300.400(g) and 300.515(d) & (h). Experience to date around the country has shown that a failure to identify ARARs with sufficient precision, early in the process, can cause severe disruptions in timely implementation of remedial actions. To ensure timely and complete ARARs identification for the FS identified above, please include the following information:

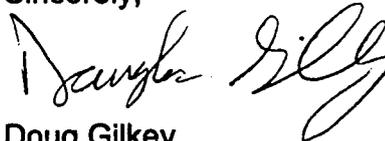
1. A specific citation to the statutory or regulatory provision(s) for the potential State ARAR and the date of enactment or promulgation.
2. A brief description of why the potential State ARAR is applicable or relevant and appropriate to the particular IR Site.
3. If the State believes its proposed ARAR is more stringent than the corresponding Federal ARAR, please provide the rationale and technical justification for this position.

4. Any advisories, criteria, or guidance that your agency thinks should be considered and a brief description and justification as to why it should be considered.
5. If the State determines that there is not enough information to fully respond to our request, please identify any additional information that would be required to support identification of State ARARs and their application.

Chemicals of potential concern (COPC) include mercury, copper and PCBs. A list and description of remedial technologies and process options that are currently being evaluated for remedial alternatives at Parcel F is provided as enclosure (1).

Consistent with 40 CFR §300.515 (h)(2), we are requesting that you send a response via first class mail addressed to Mr. Ryan Ahlersmeyer and postmarked within thirty (30) calendar days of receipt of this request. Please direct any technical questions that you may have concerning this request to Mr. Ryan Ahlersmeyer at (619) 532-0960 and legal questions to Mr. Rex Callaway, Associate Counsel (Environmental), at (619) 532-0988

Sincerely,



Doug Gilkey
Base Closure Manager

Enclosure:

(1) Table 1, Potential Remedial Technologies and Process Options

Copy to: (Hard Copy)

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San Francisco, CA 94102

Ms. Diane Silva (3 Hardcopies)
1220 Pacific Highway
San Diego, CA 92112

TABLE 1: POTENTIAL REMEDIAL TECHNOLOGIES AND PROCESS OPTIONS

Parcel F, Hunters Point Shipyard, San Francisco

Remedial Technology Alternative	Description
SEDIMENT OPTIONS	
Institutional Controls	Applying deed restrictions on future excavation. Deed restrictions would inform future property owners of the presence of contaminated sediment and fish advisories.
Containment via capping	Capping is the placement of clean material over contaminated sediment. The cap material being evaluated for Parcel F includes AquaBlock (clay), sand, carbon and armored caps.
Excavation/Dredging and Off-site disposal	Excavation/Dredging – Removal of sediment with mechanical or hydraulic dredge equipment and backfilling with clean fill. The dredged sediment will be transported to a Class I, II, or III landfill facility off-site. Sediment transported to a Class I facility may require additional treatment, such as stabilization.
In-Situ Treatment	Treatment of contaminated sediments in place. PCBs in the sediment tend to preferentially accumulate in coal-derived particles and therefore reduces contaminant mobility and bioavailability. The in-situ technology under consideration is carbon.
Monitored Natural Recovery	Monitored natural recovery is the process of addressing contaminated sediments in place using ongoing aquatic processes to contain, destroy or reduce bioavailability of contaminants. The process involves natural sedimentation creating a clean surface sediment layer, thereby burying contaminated sediment over time.