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Arnold Schwarzenegger
Governor

September 14, 2009

Mr. Keith Forman
Department of the Navy
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San Diego, CA 92108-4310

COMMENTS TO DRAFT FINAL RECORD OF DECISION FOR PARCEL UC-2, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Dear Mr. Forman:

Thank you for the opportunity to review the Draft Final Record of Decision for Parcel UC-2 at Hunters Point Shipyard, San Francisco, California dated August 12, 2009 (Draft Final ROD). The Draft Final ROD has been revised in response to comments provided by the Department of Toxic Substances Control (DTSC) and the California Department of Public Health (CDPH) on July 1 and 2, 2009. CDPH does not have any additional comments at this time. However, based on our review, the DTSC has the following comments:

- (1) Response to DTSC comment 8(a), Section 2.7 – Remedial Action Objectives. Our original comment stated "Soil gas surveys will be required in order to determine if volatile organic compounds (VOCs) in soil gas do not pose an unacceptable risk via indoor inhalation of vapors" and requested corrected text to be consistent with this statement. The response provided assumes that the groundwater contaminant plume will potentially decrease over time and a soil gas survey may not be needed. Text was also modified text in Section 2.9.2 to state that a soil gas survey *may* be conducted. However, while the VOC concentrations in groundwater and soil may decrease over time, verification that VOC vapors do not pose an unacceptable exposure risk will require implementation of a soil gas survey for VOCs, particularly in areas where soil and groundwater contamination remain. In addition, verification of the VOC vapor risks using soil vapor data will be required due to the fact that soil vapor extraction, zero-valent iron (ZVI) groundwater treatment, and groundwater bioremediation are not proposed for implementation in the Draft Final ROD.
- (2) Response to DTSC comment 11(b), Section 2.8.2 – Comparative Analysis of Alternatives. Primary Balancing Criteria, Reduction in Toxicity, Mobility, or

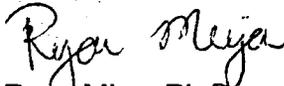
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Volume through Treatment subsection. The response provided does not appear to address the original comment which is therefore restated as follows: The text states that alternatives GW-3B and GW-4 are rated the highest "because they both reduce the toxicity and volume of contaminants by active treatment of VOCs and metals, and that alternative GW-3A would also reduce the toxicity and volume of contaminants through treatment. However, in situ ZVI reduction and bioremediation have been excluded from the Parcel UC-2 remedies. The text and relative rankings should therefore be revised accordingly to adequately evaluate the proposed Parcel UC-2 remedies.

- (3) Response to DTSC, Office of Legal Affairs, Comment 2. The response provided does not appear to address the original comment which is therefore restated as follows: Please explain why Alternatives S-4 and GW-2 were not selected since they contain all the retained components selected from Alternatives S-5 and GW-3B.

If you have any questions, please call me at (510)540-3775.

Sincerely,



Ryan Miya, Ph.D.
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Program - Berkeley

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