

Packard, Shannon E CTR NAVFAC SW

From: Koppel, Sarah A CIV NAVFAC SW
Sent: Monday, February 08, 2010 1:10 PM
To: Packard, Shannon E CTR NAVFAC SW
Subject: FW: Amended EPA Comments on the Draft Final UC-2 ROD
Signed By: sarah.koppel@navy.mil

Attachments: Parcel UC-2.Draft Final ROD.EPA comments.doc



Parcel UC-2.Draft
Final ROD.EP...

This is what I have ...

Thanks,
Sarah

-----Original Message-----

From: Ripperda.Mark@epamail.epa.gov [mailto:Ripperda.Mark@epamail.epa.gov]
Sent: Thursday, September 17, 2009 11:41
To: Koppel, Sarah A CIV NAVFAC SW
Cc: Amy Brownell; ersimon@waterboards.ca.gov; kbrasaemle@techlawinc.com; Forman, Keith S CIV OASN (I&E) BRAC PMO West; RMiya@dtsc.ca.gov; RSteenon@waterboards.ca.gov; Kloss.Sarah@epamail.epa.gov; steve.hall@ttemi.com; Carr.Robert@epamail.epa.gov
Subject: Amended EPA Comments on the Draft Final UC-2 ROD

Hi Sarah, here is the new version of our comments, with a few additional thoughts from Bob Carr.

From: "Koppel, Sarah A CIV NAVFAC SW" <sarah.koppel@navy.mil>
To: "Amy Brownell" <Amy.Brownell@sfdph.org>, "Forman, Keith S CIV OASN (I&E) BRAC PMO West" <keith.s.forman@navy.mil>, <kbrasaemle@techlawinc.com>, Mark Ripperda/R9/USEPA/US@EPA, <ersimon@waterboards.ca.gov>, <RSteenon@waterboards.ca.gov>, <RMiya@dtsc.ca.gov>, Sarah Kloss/R9/USEPA/US@EPA, <steve.hall@ttemi.com>
Date: 09/14/2009 08:04 AM
Subject: RE: Draft Final UC-2 ROD

Thanks Amy!

Just a reminder that the UC-2 ROD comments are due today.

Thanks,
Sarah

-----Original Message-----

From: Amy Brownell [mailto:Amy.Brownell@sfdph.org <mailto:Amy.Brownell@sfdph.org>]
Sent: Friday, September 11, 2009 17:06
To: Forman, Keith S CIV OASN (I&E) BRAC PMO West; kbrasaemle@techlawinc.com; Ripperda.Mark@epamail.epa.gov; ersimon@waterboards.ca.gov; RSteenon@waterboards.ca.gov; RMiya@dtsc.ca.gov; Kloss.Sarah@epamail.epa.gov; Kito, Melanie R CIV NAVFAC SW; Jensen, Dane C CIV NAVFAC SW; Koppel, Sarah A CIV NAVFAC SW; Yantos, Christopher N CTR OASN (I&E),

BRAC PMO West; Kayaci, G Hamide CTR OASN (I&E) BRAC PMO West; Loli, Simon CTR OASN (I&E),
BRAC PMO West; Urizar, Lara L CTR OASN (I&E), BRAC PMO West; steve.hall@ttemi.com
Cc: saulbloom@arcecolology.org; dcshipman@treadwellrollo.com; sreinis@treadwellrollo.com;
Jeff.Austin@lennar.com; JJFenton@mactec.com; drathnayake@mactec.com;
RBrandt@Geosyntec.com; Elaine Warren; gordonhart@paulhastings.com;
erickahailstockejohnson@paulhastings.com; Michael Cohen; Tiffany Bohee
Subject: Draft Final UC-2 ROD

see attached comments

thanks,
amy brownell

(See attached file: City Lennar Comments draft final UC2 ROD.pdf)

**USEPA Comments on the Draft Final ROD for Parcel UC-2
Hunters Point Shipyard
Document Dated August 12, 2009, Comments Dated September 17, 2009**

General Comment: This ROD should stand alone and not evaluate remedy components which are only related to Parcel C, and which are not applicable at Parcel UC-2. We understand that Parcel UC-2 was divided from Parcel C after the Proposed Plan, but that can be explained up-front, and then all components unrelated to conditions at Parcel UC-2 should be deleted. Specifically, on Page 2 the sentence beginning "One overall remedy was selected..." should be replaced with the following: "Parcel UC-2 was evaluated as part of the Parcel C RI/FS and proposed plan. However, this ROD addresses only those releases which are located within the newly defined parcel UC-2 and does not address the balance of the former Parcel C".

Page 1: Please remove the sentence in the footnote which states: "The excerpts referenced by the hyperlinks are part of the ROD."

Section 2.3, page 14 (original comment 2): The text states that no soil samples were collected within UC-2, but provides no reason for that. The first paragraph of the section describes the Parcel C RI and FS, but doesn't clearly explain why no samples were collected in UC-2 and why either the results from Parcel C or HPALs should be used in UC-2. Please edit the section to explain that there were no known sources in UC-2 and hence no soil samples, but that conditions can be represented by HPALs.

Tables 3 and 4 (original comment 2): I agree with removing the redundant inclusion of RGs in both tables. However, the rest of the response did not address the comment. The response states that no samples were collected in UC-2, but then goes on to say that "some of the risk grids ... include the northern border of UC-2". Samples were either collected within UC-2 or they weren't. If the samples were collected immediately outside of and adjacent to UC-2, then present it that way in the ROD, or explain that since no samples were collected, we're assuming that the soil levels are represented by HPALs. Table 3 confuses the issue by implying that samples were collected, which is at odds with the text on page 14 (footnote b doesn't help). In addition, there shouldn't be a distinction between residential and construction scenarios in Table 3. If we're assuming HPALs exist across the parcel, then that is what drives the need for a cover and LUCs in both the residential and construction worker areas. Please either re-do Table 3 or change the table to text to present and explain that the soil levels are estimated based on HPALs throughout the parcel.

Section 2.3, Table 3, and Figure 6 (original comment 3): Please use the latest data on the figure and in Table 3, or at least the highest data from the last year of sampling. The text on page 15 provides an appropriate discussion of the 1997 high hit and the more recent data. Similar to the previous comment, the discrepancy between the text and Table 3 is counterproductive.

Sections 2.8, 2.8.1, and 2.8.2 (original comment 5): I know that you're trying to be consistent with the Proposed Plan, which included alternatives not necessary for UC-2. However, this can be accomplished much more clearly with a slightly expanded discussion in Section 2.8.1. Please

delete the second paragraph of Section 2.8, as it is redundant with the second paragraph of Section 2.8.1. Provide an explanation for the two bullets in Section 2.8.1 and further explain that only the alternatives in the Proposed Plan that apply to Parcel UC-2 will be carried through in the subsequent sections of this ROD. Then delete any alternatives or discussions from the rest of the following subsections and Tables 6 and 7 that do not apply to Parcel UC-2. This ROD should focus on Parcel UC-2, and not try to compare and contrast with Parcel C.

Section 2.9.1 and 2.9.2: Related to the previous comment, please delete the new text in Section 2.9.1. Also edit the sections, particularly the first two paragraphs of Section 2.9.1 to select remedies appropriate for Parcel UC-2, i.e., covers and ICs for soil and MNA and ICs for groundwater.

Section 2.9.1 and 2.9.2 (original comment 8): Selecting MNA requires some analysis of both long-term effectiveness and implementability. The current discussion is too general and doesn't get at the point of will MNA work. You have data that shows a decrease of about an order of magnitude over ten years. MNA guidance requires that you include a discussion that provides a justification for MNA and that shows that remedial goals will be achieved in a reasonable time frame.

Table 6 and Section 2.9.2: Please include a thickness for the soil covers or state that because of the steep slope, the thickness will be determined in RD.

General Comment 2 from Robert Carr: We want to confirm our understanding from the response that MNA is the preferred remedy for that portion of the plume in Parcel C. If so, no need to make any changes to the text.

Section 2.9.2, bottom of page 40: Please add a sentence to the last paragraph on page 40 stating that the LUC RD shall be submitted in accordance with the FFA schedule.

Page 22: Clarify statement regarding rad risk to make it current. "Prior to the removal of rad impacted structures...."

Page 26: Eliminate the discussion of remedy components which do not relate to UC-2 here and in the balance of the comparison of alternatives.

Page 37: Limit to UC-2. There is no selected parcel wide remedy for Parcel C at this point.

Page 38: How can a two foot soil cover be installed on a steep slope?

Page 39: Has rad work been completed as stated on page 10 or is it planned as suggested here?