

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION (ROD) FOR PARCEL UC-2,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA**

The table below contains the responses to comments received from the regulatory agencies on the “Draft Final Record of Decision for Parcel UC-2, Hunters Point Shipyard, San Francisco, California,” dated August 12, 2009. The comments addressed below were received from the U.S. Environmental Protection Agency (EPA), the California Department of Toxic Substances Control (DTSC), the California Regional Water Control Board (Water Board), and the San Francisco City and County Department of Public Health (city) during the period from September 11, 2009, through September 17, 2009. Throughout this table, *italicized* text represents additions to the document and ~~strikeout~~ text indicates deletions. Also throughout this table, references to page, section, table, and figure numbers pertain to the new document unless indicated otherwise.

No.	Page	Comment	Response
Responses to Comments from U.S. Environmental Protection Agency (Mark Ripperda, dated and received September 17, 2009)			
GENERAL COMMENT			
1.		<p>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".</p>	<p>The Navy received comments related to selected remedial alternatives and selected remedy components from EPA and DTSC. The general changes proposed by these comments are summarized as follows:</p> <ul style="list-style-type: none"> (A) Only remedy components relevant to Parcel UC-2 should be discussed in the ROD (EPA). (B) Remedial alternatives which have the same remedy components for Parcel UC-2 should be evaluated and rated consistently as the same (DTSC). (C) For relevant remedy components that are the same for two alternatives, as in soil remedial alternatives S-4 and S-5, the Navy may consider selecting the simpler S-4 rather than S-5 (the preferred alternative through the Feasibility Study [FS] and Proposed Plan) (DTSC). <p>The Navy agrees with the above recommendations and has incorporated changes in the Final ROD accordingly. Only remedy components relevant to Parcel UC-2 were evaluated in the final ROD. For two remedial alternatives with identical remedy components (that is, same cost and relative ranking), such as for soil Alternatives S-4 and S-5, the alternatives were evaluated as the same—in this case, Alternative S-4/5. The Navy has been consistent in the presentation and evaluation of remedial alternatives for the Parcel UC-2 portion of the former Parcel C throughout the FS, Proposed Plan, Draft ROD, and the Draft Final ROD, as required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. The Navy believes that the changes incorporated to the Final UC-2 ROD have greatly reduced the complexity of the Final ROD and improved readability, while continuing to meet CERCLA requirements. Please see also responses to EPA (Mr. Ripperda Specific Comments 5 and 6; Mr. Carr Specific Comment 3) and DTSC (General Comments 2 and 3).</p>

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR PARCEL UC-2,
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No.	Page	Comment	Response
Responses to Comments from U.S. Environmental Protection Agency (Mark Ripperda, dated and received September 17, 2009) (Continued)			
1. (Cont'd)			<p>In response to this comment, the Navy revised the text on Page 2, Section 1.1 SELECTED REMEDY, first paragraph as follows:</p> <p>“One overall remedy was selected for Parcels UC-2 and C; however, many of the actions in the overall remedy are not required at Parcel UC-2. Parcel UC-2 was evaluated as part of the FS for the former Parcel C and Proposed Plan for Parcels C and UC-2. 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.”</p>
SPECIFIC COMMENTS			
1.		Page 1: Please remove the sentence in the footnote which states: “The excerpts referenced by the hyperlinks are part of the ROD.”	The sentence has been removed.
2.		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.	<p>Section 2.3 was revised as suggested:</p> <p><i>Because no known sources of chemical contamination are in Parcel UC-2 soil, no soil samples were collected. The Final FS Report for Parcel C concluded that soil conditions in the Parcel UC-2 area can be represented by Hunters Point ambient levels (HPAL). Therefore, the predominant chemicals of concern in Parcel UC-2 soil are metals₍₁₀₎. Although no soil samples were collected within Parcel UC-2, the final Parcel C FS concluded that based on soil data collected within Parcel C, elevated concentrations of metals such as arsenic, manganese, and nickel are expected for fill material derived from quarried bedrock that was used to build the shipyard in the 1940s. The final Parcel C FS also recommended applying the cover alternative parcel-wide because of the ubiquity of metals at concentrations that exceed remediation goals throughout the former Parcel C, including Parcel UC-2.</i></p>

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3.		<p>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.</p>	<p>Tables 3 and 4 were revised as suggested: Parcel UC-2 soil concentrations are represented by HPALs, the distinction between the residential and construction risk scenarios was removed, and the footnotes were revised (see below).</p> <p>In Table 3, footnote b was revised as follows:</p> <p><i>Although no soil data were collected within Parcel UC-2, soil conditions can be represented by Hunters Point ambient levels (HPAL), which indicate that elevated concentrations of metals such as arsenic (11.1 mg/kg) and manganese (1,431 mg/kg) are present. the maximum concentrations of metals such as arsenic and manganese are expected to exceed the soil remediation goal.</i></p> <p>In Table 4, the following was added as footnote d:</p> <p><i>Although no soil data were collected within Parcel UC-2, soil conditions can be represented by Hunters Point ambient levels (HPAL). Maximum concentrations of metals such as arsenic and manganese are expected to exceed the soil remediation goal.</i></p>
4.		<p>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.</p>	<p>The difficulty with revising Section 2.3, Table 3, and Figure 6 is that these sections accurately present the 1997 data set used in the risk assessment and feasibility study for Parcel UC-2. The more recent data were added to the draft final ROD at the request of the regulatory agencies, but these were not the data used to make remedial decisions for Parcel UC-2.</p> <p>In response to this comment, Figure 6 was changed as follows: (1) the inset label, "Carbon Tetrachloride 28 µg/L" was changed to "Carbon Tetrachloride 28 µg/L (1993) and 5 µg/L (April 2008)*," and (2) note was added "<i>*Maximum concentration detected (1993). In April 2008, maximum concentration of carbon tetrachloride was 5 µg/L.</i>"</p> <p>In Table 3, Chemicals of Concern in Soil and Groundwater Requiring a Response Action, footnote c was added to the groundwater concentrations for VOCs to show concentrations from the most recent groundwater data from April 2008 as follows:</p> <p><i>Maximum concentrations in groundwater from the most recent groundwater monitoring event (April 2008) are as follows: carbon tetrachloride (5 µg/L), chloroform (2.5 µg/L), and trichloroethene (0.5 µg/L).</i></p>

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4. (cont'd)			Please also see response to EPA (Ripperda) Specific Comment 7.
5.		<p>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.</p>	<p>Please see also responses to EPA (Mr. Ripperda General Comment 1 and Specific Comment 6; Mr. Carr Specific Comment 3) and DTSC (General Comments 2 and 3).</p> <p>The suggested changes were incorporated in the ROD (Section 2.8, Section 2.9, Table 7 (formerly Table 6), and Table 8 (formerly Table 7)).</p> <p>Section 2.8 DESCRIPTION AND EVALUATION OF REMEDIAL ALTERNATIVES, second paragraph, was removed.</p> <p>Section 2.8.1 Description of Remedial Alternatives, was modified as follows:</p> <p>"The feasibility study was conducted for the former Parcel C, which consisted of the current Parcels UC-2 and C. Parcel UC-2 is a small, non-industrial portion of the former Parcel C. The former Parcel C was subsequently split into the current Parcels C and UC-2 at the proposed plan stage of the CERCLA process. Evaluation of risk, development of remedial action objectives, and evaluation of remedial alternatives as documented in the final feasibility study pertain to both the current Parcel C and UC-2; as such, only a subset of the soil and groundwater remedy components evaluated in the FS are applicable to the Parcel UC-2 portion of the former Parcel C.</p> <p><i>The relevant remedy components are as follows:</i></p> <ul style="list-style-type: none"> • ICs, maintained landscaping, and covers for soil. • ICs, long-term monitoring, and MNA for groundwater. <p>Full description of the remedial alternatives as presented in the FS and proposed plan were retained for completeness and consistency. However, many of the following The following remedy components in the soil and groundwater alternatives are not relevant for the Parcel UC-2 portion of the former Parcel C, and therefore are not applicable to Parcel UC-2:</p> <ul style="list-style-type: none"> • Excavation, off-site disposal, and SVE for soil. • In situ ZVI reduction and bioremediation for groundwater. <p><i>Only the relevant remedy components for Parcel UC-2 are presented and evaluated in this ROD.</i></p>

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5. (Cont'd)			<p>The relevant remedy components for Parcel UC-2 are summarized below:</p> <p>Table 6. Summary of Parcel UC-2 Remedial Alternatives and Remedy Components</p> <table border="1" data-bbox="961 444 1955 1286"> <thead> <tr> <th data-bbox="961 444 1161 597"><i>Medium</i></th> <th data-bbox="1161 444 1310 597"><i>UC-2 ROD Alternative</i></th> <th data-bbox="1310 444 1459 597"><i>FS Alternative</i></th> <th data-bbox="1459 444 1719 597"><i>Relevant Remedy Components for Parcel UC-2</i></th> <th data-bbox="1719 444 1955 597"><i>Remedy Components not Relevant for Parcel UC-2 (not evaluated in ROD)</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="961 597 1161 846" rowspan="5"><i>Soil</i></td> <td data-bbox="1161 597 1310 634">S-1</td> <td data-bbox="1310 597 1459 634">S-1</td> <td data-bbox="1459 597 1719 634"><i>Existing Soil</i></td> <td data-bbox="1719 597 1955 634"></td> </tr> <tr> <td data-bbox="1161 634 1310 695" rowspan="2">S-2/3</td> <td data-bbox="1310 634 1459 695">S-2</td> <td data-bbox="1459 634 1719 695"><i>ICs, Maintained Landscaping</i></td> <td data-bbox="1719 634 1955 695"></td> </tr> <tr> <td data-bbox="1310 695 1459 755">S-3</td> <td data-bbox="1459 695 1719 755"><i>ICs, Maintained Landscaping</i></td> <td data-bbox="1719 695 1955 755"><i>Excavation, Off- site Disposal</i></td> </tr> <tr> <td data-bbox="1161 755 1310 846" rowspan="2">S-4/5</td> <td data-bbox="1310 755 1459 792">S-4</td> <td data-bbox="1459 755 1719 792"><i>ICs, Install Covers</i></td> <td data-bbox="1719 755 1955 792"></td> </tr> <tr> <td data-bbox="1310 792 1459 846">S-5</td> <td data-bbox="1459 792 1719 846"><i>ICs, Install Covers</i></td> <td data-bbox="1719 792 1955 846"><i>Excavation, Off- site Disposal, SVE</i></td> </tr> <tr> <td data-bbox="961 846 1161 1130" rowspan="4"><i>Groundwater</i></td> <td data-bbox="1161 846 1310 911">GW-1</td> <td data-bbox="1310 846 1459 911">GW-1</td> <td data-bbox="1459 846 1719 911"><i>Existing Groundwater</i></td> <td data-bbox="1719 846 1955 911"></td> </tr> <tr> <td data-bbox="1161 911 1310 976">GW-2</td> <td data-bbox="1310 911 1459 976">GW-2</td> <td data-bbox="1459 911 1719 976"><i>ICs, Groundwater Monitoring</i></td> <td data-bbox="1719 911 1955 976"></td> </tr> <tr> <td data-bbox="1161 976 1310 1036" rowspan="2">GW-3/4</td> <td data-bbox="1310 976 1459 1036">GW-3(A&B)</td> <td data-bbox="1459 976 1719 1036"><i>ICs, Monitored Natural Attenuation</i></td> <td data-bbox="1719 976 1955 1036"><i>ZVI reduction; bioremediation</i></td> </tr> <tr> <td data-bbox="1310 1036 1459 1130">GW-4</td> <td data-bbox="1459 1036 1719 1130"><i>ICs, Monitored Natural Attenuation</i></td> <td data-bbox="1719 1036 1955 1130"><i>ZVI reduction; plume-wide bioremediation</i></td> </tr> <tr> <td data-bbox="961 1130 1161 1286" rowspan="2"><i>Radiologically Impacted Structures and Soil</i></td> <td data-bbox="1161 1130 1310 1195">R-1</td> <td data-bbox="1310 1130 1459 1195">R-1</td> <td data-bbox="1459 1130 1719 1195"><i>Existing Structures and Soil</i></td> <td data-bbox="1719 1130 1955 1195"></td> </tr> <tr> <td data-bbox="1161 1195 1310 1286">R-2</td> <td data-bbox="1310 1195 1459 1286">R-2</td> <td data-bbox="1459 1195 1719 1286"><i>Survey, Decontamination, Excavation, Disposal</i></td> <td data-bbox="1719 1195 1955 1286"></td> </tr> </tbody> </table>				<i>Medium</i>	<i>UC-2 ROD Alternative</i>	<i>FS Alternative</i>	<i>Relevant Remedy Components for Parcel UC-2</i>	<i>Remedy Components not Relevant for Parcel UC-2 (not evaluated in ROD)</i>	<i>Soil</i>	S-1	S-1	<i>Existing Soil</i>		S-2/3	S-2	<i>ICs, Maintained Landscaping</i>		S-3	<i>ICs, Maintained Landscaping</i>	<i>Excavation, Off- site Disposal</i>	S-4/5	S-4	<i>ICs, Install Covers</i>		S-5	<i>ICs, Install Covers</i>	<i>Excavation, Off- site Disposal, SVE</i>	<i>Groundwater</i>	GW-1	GW-1	<i>Existing Groundwater</i>		GW-2	GW-2	<i>ICs, Groundwater Monitoring</i>		GW-3/4	GW-3(A&B)	<i>ICs, Monitored Natural Attenuation</i>	<i>ZVI reduction; bioremediation</i>	GW-4	<i>ICs, Monitored Natural Attenuation</i>	<i>ZVI reduction; plume-wide bioremediation</i>	<i>Radiologically Impacted Structures and Soil</i>	R-1	R-1	<i>Existing Structures and Soil</i>		R-2	R-2	<i>Survey, Decontamination, Excavation, Disposal</i>	
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No.	Page	Comment	Response
Responses to Comments from U.S. Environmental Protection Agency (Mark Ripperda, dated and received September 17, 2009) (Continued)			
6.		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.	Please see also responses to EPA (Mr. Ripperda General Comment 1 and Specific Comment 5; Mr. Carr Specific Comment 3) and DTSC (General Comments 2 and 3). Section 2.9.1 first paragraph was deleted. Edits have been made throughout Section 2.9 to discuss only the relevant remedy components for Parcel UC-2.
7.		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.	The following text was added to Section 2.9.2: Under the Parcel UC-2 ROD, MNA will be implemented in and around the VOC plume area in both Parcels UC-2 and C (and also in downgradient locations) for the Parcel UC-2 groundwater remedy. <i>Over the past decade, the level of carbon tetrachloride has decreased by an order of magnitude. The current level of carbon tetrachloride in this area is between 1 and 5 µg/L (as of April 2008), and the Navy expects to meet the remedial goal of 0.5 µg/L within approximately the next 10 to 20 years. Therefore, selecting MNA as a remedy is justified because the remedial goals for groundwater will be achieved in a reasonable amount of time without active treatment.</i> The locations of monitoring points and the monitoring frequency will be specified in the RD. The monitoring plan will be flexible to allow modifications as data are collected.
8.		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.	Table 7 (formerly Table 6) and Section 2.9.2 were revised to include the following: <i>Because of the steep slope, the type and thickness of the soil cover will be established in the remedial design.</i>
Responses to Comments from U.S. Environmental Protection Agency (Robert Carr, dated and received September 17, 2009)			
GENERAL COMMENT			
1.		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.	As implemented in Parcel UC-2, the groundwater remedy is monitored natural attenuation (MNA) and institutional controls (IC). The ROD was changed, as reflected in response to EPA (Ripperda Specific Comment 7 above).

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Responses to Comments from U.S. Environmental Protection Agency (Robert Carr, dated and received September 17, 2009) (Continued)			
SPECIFIC COMMENTS			
1.		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.	Section 2.9.2 was revised to include the following: <i>The LUC RD will be submitted in accordance with the Federal Facility Agreement (FFA) schedule.</i>
2.		Page 22: Clarify statement regarding RAD risk to make it current. "Prior to the removal of RAD impacted structures...."	The text on page 22 was revised to state: <i>Before the affected structures (storm drains and sanitary sewers) were removed, radiological risks for soil and structures (storm drains and sanitary sewers) were greater than 10⁻⁶ across Parcel UC-2.</i>
3.		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.	Please see also responses to EPA (Mr. Ripperda General Comment 1 and Specific Comments 5 and 6); and DTSC (General Comments 2 and 3). The last paragraph of Section 2.8 (Page 28) was revised as follows: <i>"Five remedial alternatives for soil (no action, ICs and maintained landscaping, excavation, disposal, ICs, and maintained landscaping, covers and ICs; and excavation, disposal, covers, soil vapor extraction [SVE], and ICs), five remedial alternatives for groundwater (no action, ICs and long term monitoring; in situ bioremediation, monitored natural attenuation and ICs; in situ zero-valent iron [ZVI] reduction, bioremediation, monitored natural attenuation and ICs; and in situ ZVI reduction, plume wide bioremediation, monitored natural attenuation, and ICs), and two remedial alternatives for radiologically impacted structures (storm drains and sanitary sewers) and soil associated with these structures (no action; and survey, decontamination, excavation, disposal, and release) were retained for a detailed comparative analysis in accordance with the NCP."</i>
4.		Page 37: Limit to UC-2. There is no selected parcel wide remedy for Parcel C at this point.	Please see the response to EPA (Ripperda) general comment 1. The Navy concurs that there is no selected remedy for Parcel C. For clarity, the term "parcel-wide" was removed from the text.
5.		Page 38: How can a two foot soil cover be installed on a steep slope?	Please see the response to EPA (Ripperda) specific comment 8.
6.		Page 39: Has RAD work been completed as stated on page 10 or is it planned as suggested here?	The status of the radiological work has been updated on pages 10 and 15 of the ROD, and this text has also been added to page 41 of the ROD: <i>Survey and removal of the Parcel UC-2 storm drain and sanitary sewer lines were completed in early October 2009. The draft radiological survey unit report is planned for early spring in 2010.</i>

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No.	Page	Comment	Response
Responses to Comments from California Department of Toxic Substances Control (DTSC) (Ryan Miya, dated and received September 14, 2009)			
GENERAL COMMENTS			
1.		<p>Response to DTSC comment 8(a), Section 2.7 – Remedial Action Objectives. Our original comment stated ‘Soil gas surveys <u>will</u> 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 <i>may</i> 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 <u>will</u> 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.</p>	<p>The predominant chemicals present in Parcel UC-2 groundwater are volatile organic compounds (VOC), and specifically carbon tetrachloride. The highest concentration of carbon tetrachloride detected in groundwater samples from Parcel UC-2 is 28 micrograms per liter (µg/L), in 1993 in a sample from a well located in the eastern portion of IR-06. In 2007 and 2008, detections of carbon tetrachloride in this area were between 1 and 5 µg/L. Under the planned MNA remedy, the carbon tetrachloride levels should continue to decline and meet the remedial goal of 0.5 µg/L within approximately the next 10 to 20 years. Therefore, the need for a soil gas survey will be evaluated in the RD. The ROD was changed as the result of this comment as follows:</p> <p>Section 2.7, under bullet, Soil RAOs, the text was revised as follows:</p> <p>2. Prevent or minimize exposure to VOCs in soil gas at concentrations that would pose unacceptable risk via indoor inhalation of vapors. Remediation goals for VOCs to address exposure via indoor inhalation of vapors may be superseded based on COC identification information from <i>future</i> soil gas surveys that may be conducted in the future.....</p> <p>Table 4, footnote e was revised as follows:</p> <p>e Remediation goals for volatile organic compounds to address exposure via indoor inhalation of vapors may be superseded based on chemicals of concern identification information from <i>future</i> soil gas surveys that may be conducted in the future....</p>

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HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA (CONTINUED)**

No.	Page	Comment	Response
Responses to Comments from California Department of Toxic Substances Control (DTSC) (Ryan Miya, dated and received September 14, 2009) (Continued)			
2.		<p>Response to DTSC Comment 11(b), Section 2.8.2 – Comparative Analysis of Alternatives. Primary Balancing Criteria, Reduction in Toxicity, Mobility, or 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.</p>	<p>Please see also responses to EPA (Mr. Ripperda General Comment 1 and Specific Comments 5 and 6; Mr. Carr Specific Comment 3) and DTSC (General Comment 3). The requested change was made in Section 2.8.2, Table 7 (formerly Table 6) and Table 8 (formerly Table 7) to present, discuss, and evaluate only relevant remedy components for Parcel UC-2.</p>
3.		<p>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.</p>	<p>Please see also responses to EPA (Mr. Ripperda General Comment 1 and Specific Comments 5 and 6; Mr. Carr Specific Comment 3) and DTSC (General Comment 2).</p> <p>For soil remedial alternatives at Parcel UC-2, the relevant remedial components of Alternatives S-4 and S-5 are the same (install covers, ICs), and the evaluations in the ROD are identical. The Final ROD for Parcel UC-2 evaluated the two identical alternatives as Alternative S-4/5. Alternative S-4/5 is the selected alternative for Parcel UC-2 soil remedy.</p> <p>For groundwater remedial alternatives at Parcel UC-2, the relevant remedial components of Alternatives GW-3B and GW-2 are different. Alternative GW-3B includes MNA, whereas GW-2 includes only long-term monitoring. However, because the relevant remedial components of Alternatives GW-3A, GW-3B, and GW-4 are the same (MNA and ICs) and the evaluations in the ROD are identical, the Final ROD for Parcel UC-2 evaluated these identical alternatives as Alternative GW3/4. Alternative GW-3/4 is the selected alternative for Parcel UC-2 groundwater remedy.</p> <p>Revisions were made throughout the ROD to reflect the above change.</p>

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR PARCEL UC-2,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA (CONTINUED)**

No.	Page	Comment	Response
Responses to Comments from San Francisco City and County Department of Public Health – City and Lennar (Amy D. Brownell, dated and received September 11, 2009)			
GENERAL COMMENTS			
1.		Why have the references to a Risk Management Plan been removed from the draft final ROD? The Risk Management Plan is a part of the remedy and it was referenced in the draft ROD.	<p>The text in Section 2.9.2 has been revised to be consistent with the recent final ROD for Parcels D-1 and UC-1. The following text was added: <i>A Risk Management Plan (RMP) may be prepared by the City and County of San Francisco and approved by the FFA signatories that may set forth certain requirements and protocols for implementing the activity restrictions specified in the ROD.</i></p> <p>The text in these two separate paragraphs was also revised: The following restricted activities throughout HPS Parcel UC-2 must be conducted in accordance with the “Covenant(s) to Restrict Use of Property,” Quitclaim Deed(s), <i>the RMP</i>, the LUC RD report, and if required, any other work plan or document approved in accordance with these referenced documents and must be further reviewed and approved by the FFA signatories...</p> <p>Any proposed construction of enclosed structures must be approved in accordance with the “Covenant(s) to Restrict Use of the Property,” Quitclaim Deed(s), and LUC RD report, <i>and the RMP</i> with approval of the FFA signatories prior to the conduct of such activity within the ARIC for VOC vapors to ensure that the risks of potential exposures to VOC vapors are reduced to acceptable levels that are adequately protective of human health. The reduction in potential risk can be achieved through engineering controls or other design alternatives that meet the specifications set forth in the ROD, RD reports, and LUC RD report, <i>and the RMP</i>.</p>

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR PARCEL UC-2,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA (CONTINUED)**

No.	Page	Comment	Response
<p>Responses to Comments from San Francisco City and County Department of Public Health – City and Lennar (Amy D. Brownell, dated and received September 11, 2009) (Continued)</p>			
<p>2.</p>		<p>Section 2.9.2 Description of Selected Remedy. Previous City comment 6 was not revised as stated in the Navy’s Response to Comments on the Draft Parcel UC-2 ROD.</p> <p>Our Comment 6 on the Draft ROD stated: Please remove the second sentence of the first paragraph “Future landowners will need approval from the regulatory agencies to modify the covers” and replace with the following “Modification of covers will be governed by the Risk Management Plan discussed below and its terms will be enforced by the regulatory agencies.” Please consider inserting the following sentence prior to the previous sentence, “The RD will include plans for inspection and maintenance to ensure the covers remain intact”.</p> <p>The RTCs state that the first paragraph “has been revised as suggested” and lists the revision as:</p> <p>a. Inspection and maintenance requirements for the durable covers will be specified in the remedial design (RD). Modification of the covers will be governed by the LUC RD report and Risk Management Plan discussed below and its terms will be enforced by the regulatory agencies.”</p> <p>However, the text of this paragraph in the Draft Final UC-2 ROD is missing the “and Risk Management Plan” clause and instead states just:</p> <p>b. <i>“Inspection and maintenance requirements for the durable covers will be specified in the remedial design. Modification of the covers will be governed by the LUC RD report discussed below and its terms will be enforced by the regulatory agencies.”</i></p>	<p>The responses to comments (RTC) prepared for the draft ROD contained an inadvertent error that referred to the RMP instead of the RD. As requested, the following text was added to Section 2.9.2:</p> <p>Durable covers will be applied as physical barriers for the Parcel UC-2 soil remedy to cut off potential exposure to metals in soil. <i>The RD will include plans for inspection and maintenance to ensure the covers remain intact</i>requirements for the durable covers will be specified in the remedial design. Modification of the covers will be governed by the LUC RD report discussed below, and its terms will be enforced by the regulatory agencies.</p> <p>The text in Section 2.9.2 of the final ROD has been further revised to be consistent with the recent final ROD for Parcels D-1 and UC-1. Please also see the response to city general comment 1.</p>

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR PARCEL UC-2,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA (CONTINUED)**

No.	Page	Comment	Response
Responses to Comments from San Francisco City and County Department of Public Health – City and Lennar (Amy D. Brownell, dated and received September 11, 2009) (Continued)			
2. (Cont'd)		<p>No mention of the RMP is included in this paragraph or in text below it in Section 2.9.2 of the Draft Final UC-2 ROD. Additionally, the paragraph at top of page 38 in the DRAFT Parcel UC-2 ROD states:</p> <p>c. “The activity restrictions in the “Covenant(s) to Restrict Use of Property” and Quitclaim Deed(s) shall be addressed in the Parcel UC-2 Risk Management Plan (“Parcel UC-2 RMP”) that may be prepared by the City and County of San Francisco and approved by the Navy and FFA signatories and/or the land use control remedial design (LUC RD) report that would be reviewed and approved by the FFA signatories. The Parcel UC-2 RMP and/or LUC RD shall be referenced in the applicable “Covenant(s) to Restrict Use of Property” and Quitclaim Deed(s). The Parcel UC-2 RMP and/or LUC RD shall specify soil and groundwater management procedures for compliance with the remedy selected in the Parcel UC-2 ROD. The Parcel UC-2 RMP and/or LUC RD shall identify the roles of local, state, and federal government in administering the Parcel UC-2 RMP and/or LUC RD and shall include, but not be limited to, procedures for any necessary sampling and analysis requirements, worker health and safety requirements, and any necessary site-specific construction or use approvals that may be required.”</p> <p>However, the text of this paragraph, located at the bottom of page 40 in the Draft Final UC-2 ROD, no longer references the RMP.</p> <p>Our request is that the Navy please revise the first paragraph in Section 2.9.2 as indicated above in bullet “a” and the paragraph starting on the bottom of page 40 as indicated above in bullet “c”.</p>	

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR PARCEL UC-2,
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Responses to Comments from San Francisco City and County Department of Public Health – City and Lennar (Amy D. Brownell, dated and received September 11, 2009) (Continued)			
3.		Page 42, Proposed Activity Restrictions Relating to VOC vapors at specific locations within Parcel UC-2. We appreciate that the Navy has removed the requirement for VOC vapor restrictions for all of Parcel UC-2. As stated many times on previous documents, we disagree with linking a VOC vapor restriction to the redevelopment block rather than linking the restriction to the identified area of known contamination preferably based on soil vapor sampling.	Comment noted.
Response to Comment from California Regional Water Quality Control Board (Ross Steenson, dated September 16, 2009)			
GENERAL COMMENT			
1.		Please make the document language consistent with the minor revisions made to Final Record of Decision for Parcels D-1 and UC-1, as appropriate. These minor revisions included modifying the footnote on page 1 regarding excerpts referenced by hyperlink and references throughout the document to a Risk Management Plan that may be prepared by the City and County of San Francisco.	The minor revisions incorporated in the Final ROD for Parcels D-1 and UC-1 were incorporated in the Final ROD for Parcel UC-2, as requested. Please also see the responses to EPA (Ripperda) specific comment 1, EPA (Carr) specific comment 1, and city general comment 1.

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 Beatrice Appling
 Naval Facilities Engineering Command
 Southwest Division
 1220 Pacific Highway, Bldg 127
 San Diego, CA 92132-5190

 DATE: 12/17/2009
 CTO: 0039
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FROM:



Steven Bradley, Contract Manager

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