

From: Kito, Melanie R CIV NAVFAC SW [melanie.kito@navy.mil]
Sent: Sunday, May 23, 2010 7:06 AM
To: Ono, Yohji
Cc: Forman, Keith S CIV OASN (EI&E), BRAC PMO West; Kayaci, G Hamide CTR OASN (EI&E), BRAC PMO West; Dunaway, Halee N CIV NAVFAC SW, ESWD
Subject: FW: EPA Comments on the Draft Parcel C Record of Decision
Attachments: ParcelC.draftROD.epacomments.doc
Signed By: melanie.kito@navy.mil

Follow Up Flag: Follow up
Flag Status: Flagged

Yohji,

Here is another set of comments for the C ROD.

Hamide or Halee, can one of you guys get the iROD guidance and send it to Mark. You may need to go to NAVFAC portal to get it.

Thanks

Melanie

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

From: Ripperda.Mark@epamail.epa.gov [mailto:Ripperda.Mark@epamail.epa.gov]

Sent: Friday, May 21, 2010 18:45

To: Keith__Forman@mintra02.rtp.epa.gov; " <keith.s.forman@navy.mil/@epamail.epa.gov">@mintra02.rtp.epa.gov
: Ross Steenson; Leslie Lundgren; Ryan Miya; Kloss.Sarah@epamail.epa.gov; Kayaci, G Hamide CTR OASN (EI&E),
BRAC PMO West; Kito, Melanie R CIV NAVFAC SW; Amy Brownell; kbraesamle@techlawinc.com
Subject: EPA Comments on the Draft Parcel C Record of Decision

Hi Keith, here are our comments on the Parcel C Draft ROD. Do you have a guidance for IRODs. The only one I could find online is more of a PowerPoint presentation of general guidelins than a guidance:
[http://www.ert2.org/t2rodportal/files/docs/Improved%20ROD 4 16 2008 REV1.pdf](http://www.ert2.org/t2rodportal/files/docs/Improved%20ROD%204%2016%202008%20REV1.pdf)

After doing some crosswalking between those guidelines and the traditional EPA guidance, I've cut many comments that we have previously made on Hunters Point IRODs. Our HQ hasn't given us any direction on IRODs, other than to say we can accept them if all the required information is included, so I'd love to see anything official on IRODs that you have.

**EPA Review of the Review of the Draft Record of Decision for Parcel C,
Hunters Point Shipyard, San Francisco, California, April 2010**

1. The risk summary shown in Table 2 must include a comparison against residential for all Blocks. This is required because an LUC is a remedy that must be justified.
2. Table 2 should state whether it's representing total or incremental risk. Spot checking against the Parcel C FS, the Hazard Index for Block 10 is listed as 6 in Table 2, while the FS shows a maximum HI of 7 for total risk and a maximum HI of 5 for incremental risk. The cancer risk in Table 2 corresponds to the total risk shown in the FS. Because the remedial goals are to HPALs, Table 2 should probably be based on incremental risk.
3. Please replace Table 3 with a table that shows min, max, frequency of detects and exceedences, exposure point concentration, and screening criteria. This type of table is typically used in RODs to provide a more complete summary of the data. The IROD guidance that I was able to find on the web says that the table should list maximum hits like your Table 3, but the example Table 3 in the Navy IROD guidance shows the more complete data table. Only showing the max leads to confusion. For example, the discussion of the alternatives in Table 6 says that organic chemicals with concentrations above the RGs will be excavated where feasible, but the excavation remedy does not address all of the chemicals listed in Tables 3 and 4 which have detections above the RGs. If it did, then Figure 10 should match Figure 6. Also modify Table 4 to only show analytes that were risk drivers, i.e., whose EPCs were above RGs. If some chemicals are being left in place above their RGs, explain in the remedy discussion why some are being excavated and some are being addressed by the cover.
4. Table 4: The remedial goals include HPALs. This allows any soil, even soil from the Shipyard, that meets these goals to be used as the cover. You should include a goal that prohibits soil with naturally occurring asbestos.
5. Based on Section 2.3 (Previous Investigations), removal actions and treatability studies have characterized the sources and extent of the remaining contamination in soil and groundwater. Please revise the Draft ROD to include a figure showing the locations of the removal action and treatability studies listed in Table 1.
6. Please include a statement indicating that no significant changes have been made from the Proposed Plan.
7. The estimated outcomes of the selected remedies have not been provided in the Draft ROD, as required by Section 6.3.12 (Selected Remedy) of the ROD Guidance. As such, the resulting land and groundwater uses and risk reduction achieved as a result of the response actions for most of the alternatives are unclear. Please refer to Highlight 6-31 (Example Expected Outcomes for Selected Remedy) of the ROD Guidance for additional detail.

SPECIFIC COMMENTS

1. **Table 1, Previous Investigations and Removal Actions, Page 14:** The Investigation/Removal Action Activities column for the 1996-1998 Feasibility Study – Initial Phase lists the industrial land use scenario twice. The recreational cleanup scenario and associated cleanup goal were not provided.
2. **Section 2.3, Previous Investigations, Page 20:** Based on the first paragraph on Page 20, “Viscous light nonaqueous phase liquid is present, but limited to one well in RU-C1.” Please revise Section 2.3 to specify the well with the viscous LNAPL.
3. **Section 2.4, Current and Potential Future Site Uses, Page 20:** The text only describe potential future land uses. Please also briefly describe current land use (something like vacant former industrial, undergoing remediation, restricted access).
4. **Section 2.5.2, Ecological Risk Assessment, Page 27:** This section states that Chromium and Zinc need to be monitored because while they are below their respective ecological trigger levels, they are present above surface water criteria. The basis for response actions in Section 2.5.3 should thus include this monitoring.
5. **Section 2.5.3, Basis for Response Action, Page 28:** The numerical potential risks from indoor air have not been provided in the fifth bullet that covers volatile organic compound (VOC) vapors in indoor air; numerical estimates of risk are included for other media and COCs. As such, it is unclear what indoor air criteria would trigger a potential risk. Please revise the fifth bullet of Section 2.5.3 to provide the potential risks from indoor air in terms of a numerical risk estimate.
6. **Section 2.7, Remedial Action Objectives, Page 35:** The soil RAO for produce should say “Ingestion of produce grown in native soil”. Specifying residents and types of blocks are irrelevant and create loopholes. You also have to allow for growing produce in clean fill.
- t
7. **Section 2.9.2, Description of the Selected Remedy:** The Navy IROD guidelines do not mention cost tables. However, because the EPA guidance, in Section 6.3.12, specifically explains the need for more detailed cost tables, please include one here.
8. **Table 4, Remediation Goals for Soil and Groundwater, Pages 39 through 44:** Neither Table 4 nor the RAO section explains how the remediation goals were selected. Please revise the Draft ROD to clarify how the remediation goals for COCs were selected.
9. **Table 6, Remedial Alternatives, Page 47:** The description of LUCs under Alternative 2: “Proprietary controls, restrictive covenants, restricted land use...” is rather opaque. See the LUC heading in Highlight 6-22 of the EPA ROD guidance for examples of more simple descriptions. The description should be very brief because the full explanation

comes later, but it should at least provide an understanding of how the LUCs will be implemented.

10. **Table 6, Remedial Alternatives, Page 47 through 53:** The note that no adjustments were made to the original cost analysis because Parcel UC-2 represented only 5 percent of the former Parcel C land area is not very clear. It would be more straightforward to remove the note from throughout the table and include an explanation in the cost discussion that the costs shown are from the FS for combined Parcels C and UC-2 and that the costs for Parcel UC-2 are negligible and the original cost estimate is valid for Parcel C.
11. **Section 2.9.2, Page 59, Second Paragraph:** Please add the word ubiquitous before the word metals in the description of the site wide cover.
12. **Section 2.9.2, Page 62:** Please say that the LUCs apply to all of Parcel C, as shown in Figure 2. EPA HQ, in the LUC checklist, wants a distinct map of the LUC boundaries.