



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Secretary for
Environmental Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
510.622.2300 • Fax 510.622.2460
www.waterboards.ca.gov/sanfranciscobay

Arnold Schwarzenegger
Governor

NO0217_001973
HUNTERS POINT
SSIC NO. 5090.3.A

Letter sent via email

Date: May 19, 2010
File No. 2169.6032 (RAS)
GeoTracker Global ID: T0607591567

U.S. Department of the Navy
Attn: Mr. Keith S. Forman
BRAC Program Management Office – West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310
Via email only: keith.s.forman@navy.mil

Subject: Comments on the *Draft Record of Decision for Parcel C, Hunters Point Shipyard, San Francisco*, dated April 2, 2010

Dear Mr. Forman:

I reviewed the *Draft Record of Decision for Parcel C (ROD)*. Parcel C comprises about 73 acres in the central portion of the shipyard on San Francisco Bay that were used for shipping, ship repair, office, and commercial activities. The San Francisco Redevelopment Agency 1997 reuse plan calls for the property to be used as educational/cultural, maritime/industrial, mixed use, open space, and research and development. The mixed used and research and development categories allow residential use.

The preferred remedy in the *ROD* includes the following components: (1) soil alternative S-5 – excavation, disposal, covers, soil vapor extraction, and institutional controls; (2) groundwater alternative GW-3B – in situ zero valent iron and biological treatment, monitored natural attenuation, and institutional controls; and (3) radiologically impacted structures and soil alternative R-2 – survey, decontamination, excavation, disposal, and release.

We continue to support the Navy and US EPA joint selection of the preferred remedy for Parcel C. My comments on the *ROD* are as follows:

COMMENTS

1. **Section 2.2 (Site Characteristics), p. 10** – Please indicate the typical range of depths to groundwater across the parcel.
2. **Figure 7 (Chemicals in Groundwater Above Remedial Goals), p. 21** – The groundwater flow arrows in the northern portion of Parcel C and eastern portion of Parcel B indicate that groundwater flow is directed toward the dry docks. Please confirm whether this is correct.

- 2 -

3. **Section 2.5.1 (Human Health Risk Assessment), p. 23** – In the last sentence of the fourth paragraph, the term “chlorinated solvents” is used. Elsewhere in the document, “chlorinated VOCs” is used. Please confirm the choice of terms.
4. **Table 3 (Chemicals of Concern in Soil and Groundwater Requiring a Response Action continued) p. 34** – The notes to the table indicate that the residential, industrial, and construction worker scenarios consider exposure to soil from 0 to 10 feet below ground surface (bgs). Is there consideration of a response action (e.g., institutional controls) for potential exposure of construction workers to deep soil (greater than 10 feet bgs)?
5. **Table 4 (Remedial Goals for Soil and Groundwater) p. 39** – As was suggested at the Navy’s April 28, 2010 Community Technical Meeting, please indicate the risk level corresponding to each remedial goal in a separate column.
6. **Section 2.8 (Description and Evaluation of Remedial Alternatives), p. 46** – The listing of all the alternatives in text format is difficult to read. I recommend that the alternatives either be presented as bullet items or remove the listing from the text and rely solely on Table 6.
7. **Table 7 (Relative Ranking of Remedial Alternatives) p. 54** – During the Navy’s April 28, 2010 Community Technical Meeting, questions arose regarding the derivation of the Community Acceptance ratings. Please add a brief note(s) describing how these ratings were developed.
8. **Section 2.9.2 (Description of Selected Remedy – Proposed Activity Restrictions Relating to VOC Vapors at Specific Locations Within Parcel C), p. 63** – The Navy is preparing to conduct soil gas sampling that will include the laboratory analysis of volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs). Please explicitly define “VOC vapors.” This definition should not exclude any SVOCs that are found to be chemicals of concern in soil gas.

Please contact me at (510) 622-2445 or rsteenson@waterboards.ca.gov if you have any questions.

Sincerely,

Ross Steenson, PG, CHG
Engineering Geologist
Groundwater Protection Division

- 3 -

Cc (via email only):

Ms. Melanie Kito, U.S. Department of the Navy, melanie.kito@navy.mil
Ms. Sarah Koppel, U.S. Department of the Navy, sarah.koppel@navy.mil
Ms. Hamide Kayaci, U.S. Department of the Navy, hamide.kayaci.ctr@navy.mil
Mr. Mark Ripperda, U.S. Environmental Protection Agency, Region 9, ripperda.mark@epa.gov
Ms. Sarah Kloss, U.S. Environmental Protection Agency, Region 9, kloss.sarah@epa.gov
Mr. Ryan Miya, California Department of Toxic Substances Control, rmiya@dtsc.ca.gov
Ms. Amy Brownell, SF Department of Public Health, amy.brownell@sfdph.org
Mr. Stephen Proud, Lennar Bay Area Urban, stephen.proud@lennar.com
Ms. Leslie Lundgren, CH2M Hill, leslie.lundgren@CH2M.com
Ms. Marie Harrison, Greenaction, marie@greenaction.org

From: Kito, Melanie R CIV NAVFAC SW [melanie.kito@navy.mil]
Sent: Friday, May 21, 2010 9:45 AM
To: Ono, Yohji
Subject: FW: Hunters Point - RWQCB Comments on the Draft Parcel C Record of Decision
Attachments: 20100519_Hunters Point_RWQCB Comments on Apr 2, 2010 Parcel C Draft ROD.pdf
Signed By: melanie.kito@navy.mil

Follow Up Flag: Follow up
Flag Status: Flagged

Yohji,

You are doing the Parcel C ROD right?

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

From: Ross Steenson [mailto:RSteenson@waterboards.ca.gov]
Sent: Wednesday, May 19, 2010 12:04
To: Leslie Lundgren; Ryan Miya; Sarah Kloss; Mark Ripperda; Marie Harrison; Stephen Proud; Kayaci, G Hamide CTR OASN (EI&E), BRAC PMO West; Forman, Keith S CIV OASN (EI&E), BRAC PMO West; Kito, Melanie R CIV NAVFAC SW; Koppel, Sarah A CIV NAVFAC SW; Amy Brownell
Subject: Hunters Point - RWQCB Comments on the Draft Parcel C Record of Decision

Mr. Forman,

Attached are my comments on the subject document. Please contact me if you have any questions.

Regards,

Ross A. Steenson, PG, CHG
Engineering Geologist
San Francisco Bay Regional Water Quality Control Board Groundwater Protection Division
1515 Clay Street, Suite 1400
Oakland, CA 94612
Phone: (510) 622-2445
Fax: (510) 622-2460
Email: rsteenson@waterboards.ca.gov