



San Francisco City and County  
**Department of Public Health**  
**Environmental Health Section**  
**Hazardous Waste Program**

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HUNTERS POINT  
SSIC NO. 5090.3.A

May 28, 2010

Mr. Keith Forman  
BRAC Environmental Coordinator  
Hunters Point Shipyard  
Southwest Division  
Naval Facilities Engineering command  
1455 Frazee Road, Suite 900  
San Diego, CA 92108

**Draft Record of Decision for Parcel C, Hunters Point Shipyard, dated April 2, 2010.**

This letter contains comments from the City and Lennar.

General Comment

1. We would like to point out for the record, that once the engineering controls and institutional controls are properly installed and maintained the current design of the proposed remedies will cut off pathways for: a) contact with soil contaminants and b) inhalation of indoor VOC vapors and this means that the entire property will be health protective for all types of uses.
2. Depending on the timing for the current Navy efforts related to soil gas action levels and soil gas sampling, it would be beneficial to the project if subsequent drafts of the ROD incorporated this information. The projected transfer date for Parcel C is currently 2013 so it seems there is plenty of time in the schedule, even if the final ROD needs to be delayed a few months, to incorporate this valuable information and still reach a 2013 transfer date. My recollection about past discussions on this issue is that Parcel C and subsequent parcels would incorporate appropriate soil gas information in the RODs.

Specific Comments

1. **Section 2.2, page 10, 2nd paragraph, definition of F-WBZ:** F-WBZ typically refers to the First Water Bearing Zone. The acronym list indicates that F-WBZ is the bedrock water bearing zone. It is not clear in this paragraph if the F-WBZ is intended to include "*the A-aquifer, shallow aquitard, B-aquifer, and bedrock water bearing zone (F-WBZ)*" as stated. The next sentence states "*Groundwater beneath Parcel C includes the shallow A-aquifer and the deeper B-aquifer.*" which implies that the shallow A-aquifer is the first water bearing zone. Please revise.
2. **Section 2.2, page 10, second paragraph and Section 2.4, page 20, last sentence:** The statement "SFPUC prohibits use of groundwater in this area of the City" is incorrect. Please remove or revise to reflect the nuances of SFPUC management of groundwater resources.

3. **Section 2.4 Current and Potential Future Uses, page 20:** Please note that the San Francisco Redevelopment Plan 2010 Amendments are expected to be considered for approval by the San Francisco Redevelopment Agency Commission in June 2010. These amendments will require changes to the language in this section.
4. **Section 2.5.1 Human Health Risk Assessment, page 25, third paragraph:** This section should state that indoor inhalation via vapor intrusion from soil was not evaluated as an exposure pathway in the risk assessment. However, any risks (that may or may not exist) from this pathway will be addressed by future sampling that will be conducted to determine if soil gas concentrations pose unacceptable risks via indoor inhalation of vapors as described in the Soil Remedial Action Objectives (RAOs) discussion in Section 2.7.
5. **Tables 6 and 7, Pages 51 and 54, Details for GW-3 (A&B) remedial alternatives:** Table 6 indicates that groundwater will be treated with an in situ injection of a biological substrate (GW-3A) or ZVI (GW-3B). Table 7 indicates that groundwater treatment will include "In Situ Biological Treatment..." (GW-3A) or "In Situ Zero-Valent Iron and Biological Treatment..." (GW-3B). Please clarify. Also, please separate out the description of groundwater alternatives GW-3A and GW-3B on Table 6 as was done on Table 7 and throughout the text of the ROD.
6. **Section 2.8.2, Page 56, fourth paragraph:** The second sentence in the paragraph states that "Alternatives GW-3A, GW-3B, and GW-4 pose a slightly greater risk through the use of active in situ treatment compared with Alternative GW-2" and the fourth sentence states "Alternative GW-2 may pose a slightly greater risk than Alternatives GW-3A, GW-3B, and GW-4 because they require active on-site remediation." Clarify which statement is correct as they appear to be contradictory. Please also reword as in situ treatment is defined as passive not "active". Do you mean that there is less risk associated with monitoring and ICs versus adding reagents or substrates to the groundwater? If so, please state.
7. **Section 2.9.2, Page 58, first paragraph:** The section states that the only proposed excavations beneath existing buildings are located at Buildings 251 and 241. However, Figure 10 appears to show an excavation (20A-1) beneath the southeast footprint of Building 258. Please clarify.
8. **Section 2.9.2, Page 59, first full paragraph:** Please remove the sixth sentence "Future landowners will need approval from the regulatory agencies to modify the soil 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."
9. **Section 2.9.2, Page 59, first full paragraph, second sentence and Figures 3 and 10:** The second sentence states "The type of new covers installed will be consistent with the redevelopment plan (for example, soil covers may be used for open space areas or asphalt for industrial areas." Figure 3 shows the planned open space areas along the Parcel C shoreline and Figure 10 indicates that these areas will be covered with asphalt. Please revise Figure 10 to indicate that open space areas will be covered with soil.
10. **Section 2.9.2, Page 60, first full paragraph:** the Navy has made significant progress over the last year on the soil gas sampling issues. The statements in this section were written when there were still many uncertainties. We suggest, based on the progress made, that the statements should be written as follows:

“Soil gas survey will be conducted in consultation with regulatory agencies for the following purposes:

- Review existing soil data and site histories to determine areas where the ARIC for VOCs can be released from the parcel (without the need for soil gas surveys)
- Conduct a soil gas survey in focused areas where there are still concerns about residual VOCs in soil or where there are VOCs in groundwater
- Use results of the soil gas survey to identify COCs for which risk-based numeric action levels for VOCs in soil gas would be established (based on a cumulative risk of  $10^{-6}$ )
- Once risk-based numeric action levels are established, compare the results of the soil gas survey to the action levels to evaluate the need for remedial action or the release or retention of the ARIC for VOCs
- For the groundwater remediation areas, conduct a soil gas survey following completion of the remedial action for groundwater (after the areas have re-equilibrated). The results of the survey would be used to evaluate potential vapor intrusion risks, identify if the ARIC for VOCs can be released and evaluate the need for additional remedial activities.

- 11. Sections 2.7 and 2.9.2, Pages 38 and 60:** Please reference the Navy’s Soil Gas Action Level Memorandum in Item 2 top of page 38. Top of page 60, second bullet, the Soil Gas Action Level Memorandum should be referenced here as well.
- 12. Section 2.9.3:** It should be noted here that Parcel C groundwater has not been sampled for radionuclides. The Radiological Addendum to the Parcel C Feasibility Study indicates that the need for groundwater monitoring for radionuclides will be assessed and potentially conducted as part of the remedial action. Please state how this will be evaluated.
- 13. Section 2.9.3, Page 64, first paragraph:** The paragraph should state that SVE will remove halogenated VOCs in soil.
- 14. Section 2.9.4, page 64, first bullet:** Include SVE as part of the selected soil remedy.
- 15. Figure 7:** Please note the range of dates represented by the groundwater plumes shown on this figure. The text on page 20 indicates this data is pre-2004. Why not show more recent data? The A-Aquifer monitoring wells and piezometers are indicated as “Active” and the B-Aquifer monitoring wells have no such designation. Does “Active” mean currently sampled? Are the B-Aquifer wells no longer sampled? What is the difference between “Elevated” and “Areas of Concern”? Aren’t all above remedial goals?

#### Minor Comments

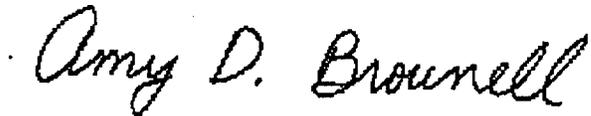
- 16. Section 2.2, 3<sup>rd</sup> paragraph, 11<sup>th</sup> line:** insert “from” after horizontal flow.

17. Section 2.3, 2<sup>nd</sup> paragraph: define TCRA.

18. Section 2.3, Page 20: define DNAPL and RAOs

19. Section 2.5: Define HHRA.

Sincerely,



Amy D. Brownell, P.E.  
Environmental Engineer

cc: Melanie Kito, Navy  
James Whitcomb, Navy  
Leslie Lundgren, CH2M Hill  
Lara Urizar, Navy  
Chris Yantos, Navy  
Hamide Kayaci, Navy  
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Dorinda Shipman, Treadwell Rollo  
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Elaine Warren, OCA  
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**From:** Kayaci, G Hamide CTR OASN (EI&E), BRAC PMO West [hamide.kayaci.ctr@navy.mil]  
**Sent:** Friday, May 28, 2010 1:56 PM  
**To:** Ono, Yohji  
**Cc:** Hall, Steve  
**Subject:** FW: City Lennar comments on draft Parcel C ROD  
**Attachments:** City Lennar Comments draft C ROD.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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

**From:** Amy Brownell [mailto:Amy.Brownell@sfdph.org]  
**Sent:** Friday, May 28, 2010 13:55  
**To:** saulbloom@arcecology.org; mikemcgowan@arcecology.org; Michael Cohen; Myisha Hervey; JJFenton@mactec.com; drathnayake@mactec.com; RBrandt@Geosyntec.com; stephen.proud@lennar.com; gordonhart@paulhastings.com; erickahailstockejohnson@paulhastings.com; LRHENDRY@mactec.com; JAB@BCLTLAW.com; Elaine Warren; Thor Kaslofsky; Tiffany Bohee; Amabel Akwa-Asare; Andrea Bruss; Barry.Steinberg@KutakRock.com; Celena Chen; dcshipman@treadwellrollo.com; sreinis@treadwellrollo.com; gejohnson@treadwellrollo.com; george.schlossberg@kutakrock.com; Wells Lawson; kbrasaemle@techlawinc.com; Ripperda.Mark@epamail.epa.gov; RSteenon@waterboards.ca.gov; RMiya@dtsc.ca.gov; Kloss.Sarah@epamail.epa.gov; Forman, Keith S CIV OASN (EI&E), BRAC PMO West; Kito, Melanie R CIV NAVFAC SW; Yantos, Christopher N CTR OASN (EI&E), BRAC PMO West; Kayaci, G Hamide CTR OASN (EI&E), BRAC PMO West; Loli, Simon CTR OASN (EI&E), BRAC PMO West; Urizar, Lara L CTR OASN (EI&E), BRAC PMO West; Whitcomb, James H CIV NAVFAC SW  
; Leslie.Lundgren@CH2M.com  
**Subject:** City Lennar comments on draft Parcel C ROD

please see attached comments on draft Parcel C ROD.

thanks,  
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(See attached file: City Lennar Comments draft C ROD.pdf)