

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

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| <b>Responses to Comments from Department of Toxic Substances Control (Thomas Lanphar)</b> |      |  |   |
| <b>GENERAL COMMENT</b>  |      |  |   |
| 1.  | NA   | Two storm drain lines, emanating from manhole MH207 and MH208 and extending into Parcel UC-1, have yet to be removed from Parcel D-2, investigated for radiological contamination and cleared for free release. According to the Navy, these manholes and sections of storm drain were not removed because they are anchor points for the Fisher/Spear utility corridor sewer system. The Navy plans to remove these sewer lines in the first quarter of 2009. All CERCLA activity must be completed prior to the finalization of the Parcel D-2 No Action Record of Decision. DTSC suggests that the results of the removal and investigation of the sewer lines be reported as an Addendum to the Parcel D-2 Removal Action Closeout Report. | Based on the comments received from the California Department of Toxic Substance Control (DTSC), the final Removal Action Completion Report (RACR) was revised to include excavation of additional storm drain and sanitary sewer lines (Survey Units 134 and 135) removed from Parcel D-2. Trench segment 02-D26-00-3J (formerly 06-D12-00-1T), and trench segments 02-D26-00-3D, -3J, and -3C (formerly part of 06-D12-00-8D) were excavated, investigated, and cleared of radiological contamination as part of the Utility Corridor 1 (Fisher/Spear) sewer removal action in April 2009. This updated information was included in the Final RACR, Revision 1, for D-2.<br><br>The revised Parcel D-2 RACR was submitted on February 12, 2010. DTSC and CDPH concurred with the revised Parcel D-2 RACR on August 9, 2010. |
| <b>SPECIFIC COMMENTS</b>  |      |  |   |
| 1.  | 1    | <b>Section 1, Declaration, last paragraph:</b> In the last paragraph of page 1 the text states Radiation, Detection, Indication, and Computation instruments (RADIAC) were used to “monitor levels and exposure to radiation at HPS. DTSC’s understanding is that the use of RADIAC in this situation was to investigate the presence of radiological contamination. DTSC suggest that this language be changed to more accurately describe the purpose of the RADIAC equipment.   | The text in Section 1 was revised as follows:<br><br>The Navy used radiation detection instruments (which the Navy commonly refers to as Radiation Detection, Indication, and Computation instruments, or “RADIAC”) to monitor levels and exposure to radiation at HPS. <i>These instruments were essential to later use of gamma or X-ray radiography equipment, decontamination efforts, and personnel monitoring, as they were employed to set up appropriate barriers to keep personnel away from radiography areas, confirm decontamination results, and monitor personnel exposures.</i>  |
| 2.  | 1    | <b>Section 1, Declaration, last paragraph:</b> Also in this last paragraph, the text describes the use of check sources to monitor proper operation of RADIACs in the field. Immediately after this sentence, the text describes a leaking check source. In order to avoid confusion, please add the following to the beginning of the latter sentence, “As a result of the investigation of Building 813...”  | The text in Section 1 was revised to address this comment and an EPA comment. Please see the response to EPA specific comment 2 for the revised text.   |

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR PARCEL D-2 (CONTINUED)  
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| <b>Responses to Comments from Department of Toxic Substances Control (Thomas Lanphar) (Continued)</b> |      |  |   |
| 3.  | 2    | <b>Section 1, first paragraph:</b> Please include a simple rationale for Navy's recommendation to remove sanitary and storm sewers at Parcels B, C, D, E and E2. | <p>The text in Section 1 was revised as follows:</p> <p><i>The HPS combined storm and sanitary sewer system was installed in the 1940s and underwent a series of separation projects (1958 to 1976), but was never completely separated. Based on gamma surveys of key manholes in the HRA, the determination was made that potential contamination of the storm and sanitary sewer system was likely near former Naval Radiological Defense Laboratory (NRDL) sites or sites associated with radium use. Therefore, the Navy also recommended removal of sanitary and storm sewers at Parcels B, C, D, E, and E-2.</i></p>   |
| 4.  | 2    | <b>Section 1, second paragraph:</b> Please provide a statement supporting that these remaining sewer lines are not radiologically contaminated.                  | <p>The text in Section 1 was revised as follows:</p> <p><i>Sewer lines located on the north side of Building 813 were not excavated because of their proximity to the retaining wall separating Parcel D-2 from the adjacent property and to prevent undermining the Building 813 loading dock. These lines either drain storm water from the roof of Building 813 or are associated with upgradient storm drain lines emanating from the non-radiologically impacted San Francisco Redevelopment Agency (SFRA) property (formerly Parcel A, which was released for unrestricted use). Based on analytical results and results of the radiological surveys, the Navy concluded that the storm drain piping remaining in place on Parcel D-2 after the removal action was not radiologically impacted. The excavated storm drain and sanitary sewer trenches were backfilled to grade and were covered with road base.</i></p> |

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR PARCEL D-2 (CONTINUED)  
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| <b>Responses to Comments from Department of Toxic Substances Control (Thomas Lanphar) (Continued)</b> |      |  |  |
| 5.  | 2    | <b>Section 1, third paragraph:</b> The text states that an unacceptable risk is defined as greater than $10^{-6}$ excess lifetime cancer risk or a segregated hazard index above 1. Instead of identifying what is an unacceptable risk, please report the calculated risk (see Section 2.5.1) and discuss why this risk is acceptable.                                  | The text in Section 1 was revised as follows:<br><br>In 2007, the Navy surveyed Building 813 for radiological contamination and found <i>the residual radioactivity meets the stated release criteria</i> <del>that no unacceptable risk was posed to human health or the environment. An unacceptable risk is defined as greater than <math>10^{-6}</math> excess lifetime cancer risk or a segregated hazard index above 1 based on the incremental risk assessment developed in the Parcel D Feasibility Study and its Radiological Addendum.</del> The California Department of Public Health (CDPH) conducted its own verification survey and approved the final status survey report for Building 813 on April 1, 2008. <del>EPA also issued a release letter.</del> The final status survey report concluded <i>Building 813 is ready for unconditional unrestricted use</i> <del>that no radiological material at or above risk levels exists at or in the building.</del> Piping under the footprint of Building 813 and outdoor areas was evaluated as part of the final status survey.<br><br>The Navy has concluded that there are no unacceptable risks from hazardous substances <i>and that the residual radioactivity or radiological material at Parcel D-2 meets the stated criteria for unconditional unrestricted use.</i> Therefore, a no further remedial action ROD is appropriate for this parcel. No covers or institutional controls will be required and no groundwater cleanup is needed for Parcel D-2. |
| 6.  | 6    | <b>Figure 2, Parcel D-2 Site Feature Map:</b> Figure 2 shows site features including the location of sanitary/storm sewers. The Navy removed sanitary and storm sewers during the radiological Time Critical Removal Action. The figure actually shows the sanitary and storm sewers that remained after the removal action. Please clarify what is shown in the figure. | The legends for Figures 2 and 3 were revised and now state that the lines shown on these figures are “Sanitary/Storm Sewer Lines (remaining after removal action).”  |
| 7.  | 7    | <b>Section 2.3, Previous Investigations:</b> Please change the title of this section to “Previous Investigations and Removal Actions.”   | The section title was revised as follows:<br><br>2.3 Previous Investigations <i>and Removal Actions</i>  |

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| <b>Responses to Comments from Department of Toxic Substances Control (Thomas Lanphar) (Continued)</b> |      |  |  |
| 8.  | 7    | <b>Section 2.3, Previous Investigations:</b> Please discuss radiological removal action remediation goals for radionuclides in Parcel D-2. Also include a table listing the remediation goals.   | Section 2.5.1 was substantially revised and now lists and discusses the radiological removal action goals.   |
| 9.  | 8    | <b>Section 2.3, Previous Investigations, first paragraph:</b> When discussing storm and sanitary sewers left in place, please include a short statement about the historical evidence supporting that the lines remaining in place are free of radiological contamination. | The text in Section 2.3 was revised as follows:<br><br>Sewer lines located on the north side of Building 813 were not excavated because of their proximity to the retaining wall separating Parcel D-2 from the adjacent property and to prevent undermining the Building 813 loading dock. <i>These lines either drain stormwater from the roof of Building 813 or are associated with upgradient storm drain lines emanating from the non-radiologically impacted SFRA property (formerly Parcel A, which was release for unrestricted use)...</i><br><br><i>...Based on analytical results and the radiological surveys, the Navy concluded that the storm drain piping remaining in place on Parcel D-2 after the removal action was not radiologically impacted.</i> The excavated storm drain and sanitary sewer trenches were backfilled to grade and were covered with road base. The removal action is described in detail in the <i>February 2010 January 2009</i> Final Removal Action Completion Report, Revision 1. |
| 10.   | 10   | <b>Section 2.5, Summary of Site Risks:</b> Please include a short discussion in this section on the remediation of the sewer system meeting As Low As Reasonably Achievable (ALARA).   | The following text was added to Section 2.5.1:<br><br><i>The National Council on Radiation Protection and Measurements in 1993 stated, "ALARA is simply the continuation of good radiation-protection programs and practices which traditionally have been effective in keeping the average and individual exposures for monitored workers well below the limits." To ensure that ALARA levels were met, the removal action was designed to (1) substantially reduce ionizing radiation below cleanup goals, and (2) eliminate identified pathways of exposure to ionizing radiation.</i>  |

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| <b>Responses to Comments from Department of Toxic Substances Control (Thomas Lanphar) (Continued)</b> |      |  |  |
| 11.   | 10   | <b>Section 2.5.1, Human Health Risk Assessment, second paragraph:</b> The text states that RESRAD results for the sewers were less than 1 millirem per year. On the next page the text states that, based on modeling, the sewers showed an increase excess cancer risk of $1.098 \times 10^{-4}$ . Please clarify if the 1-millirem dose is equated with the excess cancer risk.                            | Please see the response to DTSC specific comment 13.   |
| 12.   | 11   | <b>Section 2.5.1, Human Health Risk Assessment:</b> Because the measured activity can be below the Method Detection Limit, please change “actual” to estimated or measured.  | Please see the response to DTSC specific comment 13.   |
| 13.   | 11   | <b>Section 2.5.1, Human Health Risk Assessment:</b> Please clarify if the excess cancer risk reported for the storm sewers is calculated from the measured activity or the method detection limit. DTSC understood that health risk calculated from both the measured activity and the method detection limit would be reported. This would provide a lower and upper bound of the actual human health risk. | Section 2.5.1 was substantially revised and now presents both the net dose and net health risk for Building 813 and each storm drain and sanitary sewer survey unit. This presentation is consistent with prior HPS RODs that present the incremental and not total chemical risk in the main text. This section also includes a hyperlink to the recommendations section of each survey unit project report, which provides the potential dose and potential health risk. |
| <b>Responses to Comments from California Department of Public Health (Vandana Kohli)</b>              |      |  |  |
| <b>GENERAL COMMENTS</b>   |      |  |  |
| 1.  |      | Please note that this ROD is a No Action ROD therefore CDPH cannot provide its concurrence on the ROD until all the radiological issues with regards to the removal action performed at this parcel have been resolved.  | The revised Parcel D-2 RACR was submitted on February 12, 2010. DTSC and CDPH concurred with the revised Parcel D-2 RACR on August 9, 2010.  |

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR PARCEL D-2 (CONTINUED)  
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| <b>Responses to Comments from California Department of Public Health (Vandana Kohli) (Continued)</b> |      |  |  |
| 2.   |      | <p>The California Department of Public Health (CDPH) believes that 17 California Code of Regulations (CCR) section 30256 meets the criteria for a potential state chemical-specific ARAR and therefore should be included in the list of ARARs for this parcel. The Navy has previously indicated that 17 CCR section 30256 cannot be an ARAR as it is primarily procedural in nature. However, this regulation is also substantive, at least in part. In particular, subdivision (k) does provide a standard for clean up of radioactive material. The text of 17 CCR 30256(k) is as follows: “(k) Specific licenses shall be terminated by written notice to the licensee when the Department determines that: (1) Radioactive material has been properly disposed; (2) Reasonable effort has been made to eliminate residual radioactive contamination, if present; and (3) A radiation survey has been performed which demonstrates that the premises are suitable for release for unrestricted use; or other information submitted by the licensee is sufficient to demonstrate that the premises are suitable for release for unrestricted use.” The regulation may be more stringent than any other radiological-specific ARAR.</p> <p>In addition, while the title of the regulation is “Vacating Installations: Records and Notices,” the regulation meets the criteria of “relevant and appropriate.” The Department is aware that the regulation does not provide a numerical standard; however, a state regulation need not contain a numerical standard in order to be considered an ARAR. Furthermore, the CDPH has been ordered to use that regulation by a California judge who held that “the standard in California for decommissioning and termination of licenses for radioactive sites is found in 17 CCR Section 30256...” (Committee to Bridge the Gap v. Bonta et al, Sacramento County Superior Court, Case No 01CS01445, “Order Requiring Supplemental Return to Amended Peremptory Writ”, August 27, 2002.)</p> | <p>Because this is a no further action ROD, there are no applicable or relevant and appropriate requirements (ARAR). The Navy has previously provided a detailed response on this state regulation (see the responses to comments [RTC] on the draft ROD for Parcel UC-2, issued on August 12, 2009) explaining why it is not applicable, not relevant and appropriate, not more stringent than federal ARARs or risk-based cleanup levels, and not substantive.</p> |

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR PARCEL D-2 (CONTINUED)  
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| <b>Responses to Comments from the U.S. Environmental Protection Agency (Mark Ripperda)</b> |         |  |  |
| <b>SPECIFIC COMMENTS</b>   |         |  |  |
| 1.   | 1       | <b>Second paragraph:</b> Change the remedy selection language to match the signature page, i.e., the Navy and EPA co-select the remedy and DTSC and RWQCB concur.  | The text in Section 1 has been revised as follows:<br><br>The Department of the Navy and EPA have co-selected the no further action decision for Parcel D-2. <del>and</del> The California Environmental Protection Agency's Department of Toxic Substances Control (DTSC) and the San Francisco Bay Regional Water Quality Control Board (Water Board) concur with the no further action decision for Parcel D-2.   |
| 2.   | 1 and 4 | The description of the leaking source is not clear, partially because no one here knows what the Disaster Control Center Inventory is; it could be a physical thing not a list. One could interpret the current language as meaning that a leaking source was there at the time of the HRA. Please change the description to something like: <i>During research to support the HRA, documentation was found indicating that a single leaking 300 uCi strontium-90 check source may have been stored in the building in the past. The source was removed previously as part of the operational closeout of the building. Because of the potential for discharge from this previous source, the Navy recommended further evaluation of potential radiological contamination at Building 813.</i> | The check source itself was not found at the time of the HRA. During the HRA, reference to the check source was found on a written inventory of the Disaster Control Center, which was located in Building 813.<br><br>The text in Section 1 was revised as follows:<br><br><i>During research to support the HRA, documentation was found indicating that a single leaking 300-microcurie (µCi) strontium-90 check source may have been stored was found in the Disaster Control Center inventory, and the Disaster Control Center was located in Building 813 in the past.</i> The Navy concluded that spread of contamination from this source would be unlikely. However, the Navy recommended further evaluation of potential radiological contamination at Building 813. |
| 3.   | 1       | Please add the following text to the footnote: <i>The hyperlink will open a text box at the top of the screen. A blue box surrounds applicable information in the hyperlink. To the extent there may be any inconsistencies between the referenced information attached to the ROD via hyperlinks and the information in the basic ROD itself, the language in the basic ROD controls.</i>   | The text in the footnote was revised as follows:<br><br>This ROD is also available on CD, whereby <b>bold blue text</b> serves as a hyperlink to reference information. <del>The excerpts referenced by the hyperlinks are part of the ROD.</del> <i>The hyperlink will open a text box at the top of the screen. A blue box surrounds applicable information in the hyperlink. To the extent there may be any inconsistencies between the referenced information attached to the ROD via hyperlinks and the information in the basic ROD itself, the language in the basic ROD controls.</i>  |

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| <b>Responses to Comments from the U.S. Environmental Protection Agency (Mark Ripperda) (Continued)</b> |      |   |   |
| 4.   | 2    | <b>First Full Paragraph:</b> It would be better for the Declaration section to simply say that any contaminated storm and sanitary sewers around Building 813 were removed in 2006/2007. The current level of detail is actually somewhat confusing and is not needed in the Declaration section. | The Navy agrees that the declaration should be less detailed; however, text has been added to this section as a result of regulatory agency comments made on the draft and draft final ROD.<br><br>The text was not changed in response to this comment.                                  |
| 5.   | 2    | <b>Second Full Paragraph:</b> Please remove the sentence “EPA also issued a release letter”. Our letter wasn’t a “release” letter; it was just part of the CERCLA process, culminating in this ROD.   | The sentence was deleted from Section 1.  |
| 6.   | 6    | <b>Section 2.2:</b> The second paragraph states that groundwater in the bedrock water-bearing zone is not suitable as a potential source of drinking water, but provides no justification. Since the groundwater sampling results were all acceptable, please consider removing this statement.   | The text was revised as follows:<br><br>Groundwater is not currently used for any purpose at Parcel D-2.<br><del>Groundwater in the bedrock water-bearing zone is not suitable as a potential source of drinking water.</del>   |
| 7.   | 7    | <b>Section 2.3, First Paragraph:</b> Why use the phrase “interim ambient levels”? Were the levels below the accepted background levels or not?  | The term “interim ambient levels” was used in the original report. To avoid confusion, the text was revised to read:<br><br>The 1991 soil and groundwater analytical <b>results</b> <sub>(6)</sub> showed that concentrations of metals were below the <del>interim</del> ambient levels. |

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR PARCEL D-2 (CONTINUED)  
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| <b>Responses to Comments from the U.S. Environmental Protection Agency (Mark Ripperda) (Continued)</b> |      |  |   |
| 8.   | 7    | <p><b>Section 2.3:</b> In the paragraph beginning “In 2004, the Navy ...” I don’t understand the process described by “Piping laterals were removed to within the first 10 feet of their union with a main trunk line” means. ... or to the face of Building 813, whichever came first”. Did you mean to say “Piping laterals were removed beginning within the first 10 feet ...”?</p>                | <p>This ROD text comes directly from the final RACR; some additional text from the RACR was added, but the text was largely retained for consistency:</p> <p>In 2006, the Navy began implementation of a removal action addressing the Parcel D-2 storm and sanitary sewers. The removal action was conducted in stages. <i>First</i>, storm drain and sanitary sewer piping laterals were removed to within the first 10 feet of their union with a main trunk line. If no radiological contamination was present in this segment of the line, then the exposed ends of the lateral were capped or plugged and the remaining portions left in place. <i>Next, however</i>, if evidence of radiological contamination was encountered, the remaining lateral was removed in 10-linear-foot sections until the line had been determined to be free of radioactive contamination or to the face of Building 813 <i>or other obstruction (stairways or loading docks) as practicable</i>, whichever came first.</p>  |
| 9.   | 7    | <p><b>Section 2.3:</b> The discussion above describes the process but not the results. Please add a paragraph providing the results. Also, since a little cesium and I believe radium were found, you should explain where it came from since you state that no source existed in the building. Backflow from the main trunk line for the cesium? Possible natural variation in the fill material?</p> | <p>The text in Section 2.3 was revised as follows:</p> <p>In 2007<del>9</del>, the Navy completed the removal of sanitary and storm sewers. <i>A total of 1,988 linear feet of trench (including overburden soil, peripheral material, excavated soil, and pipe/manhole) was excavated during the removal actions. One of the seven manholes (MH208) was disposed of as low-level radioactive waste (LLRW) because cesium-137 activity was detected above the release limit and only 3 linear feet of pipe was disposed of as LLRW based on elevated static measurements. Identification of elevated activity in piping or manholes does not necessarily indicate the historical use or storage of radioactive material at the nearest radiologically impacted area because the HPS combined storm drain and sanitary sewer systems have been modified and repaired over many years, and flow patterns may have changed. The identification of cesium-137 activity above the release limit in MH208 sediment is consistent with the conceptual site model for the radiologically impacted storm drain and sanitary sewers at HPS. The Navy has conducted surveys showing all areas of <b>Parcel D-2 storm drains and sanitary sewers meet the risk criteria for release</b><sub>(13)</sub>.</i></p> |

**RESPONSES TO COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR PARCEL D-2 (CONTINUED)  
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| <b>Responses to Comments from the U.S. Environmental Protection Agency (Mark Ripperda) (Continued)</b> |      |  |   |
| 10.  | 10   | <b>Section 2.5.1, First Paragraph:</b> The second to the last sentence states: “The RESRAD results for the sewers were less than 1 millirem per year.” This contradicts language two paragraphs down that the risk is $10^{-4}$ (see our next comment). Please resolve the discrepancy and find a more simple way to describe the risk. If 1 millirem per year is correct, then what’s the point of the following discussion?  | Please see the response to EPA specific comment 11.   |
| 11.  | 11   | <b>Section 2.5.1: The first full paragraph (beginning “The Navy evaluated”) needs clarifying.</b> The phrase “the additional modeling showed that the increased excess cancer risk resulting from the remedial actions on the trenches was $1.098 \times 10^{-4}$ ” implies that the remedial actions caused an excess cancer risk. First, for correctness, change the word remedial to removal in any reference to a removal action. Secondly, find a better way to describe this result. Is this the modeling on the pre or post removal conditions? If post removal, wouldn’t that make it indicative of background and not excess risk? Alternatively, since no radiological contamination remains above background in and around the building, you could delete Section 2.5.1, and just add a sentence to Section 2.5 saying no source is present, thus there is no potential incremental risk. | Section 2.5.1 was substantially revised and now presents both the net dose and net health risk for Building 813 and each storm drain and sanitary sewer survey unit. This presentation is consistent with prior HPS RODs that present the incremental and not total chemical risk. This section also includes a hyperlink to the recommendations section of each survey unit project report, which provides the potential dose and health risk. |
| <b>Responses to Comments from the California Regional Water Quality Control Board (Erich Simon)</b>    |      |  |   |
| <b>GENERAL COMMENT</b>   |      |  |   |
| 1.   |      | I do not have any further comments on the Parcel D-2 ROD and defer to EPA and DTSC comments regarding any remaining radiological concerns. I would like to note that I concur with Comment #6 submitted by EPA on 2/17/09.   | Comment noted.  |

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| <b>Responses to Comments from the San Francisco City and County Department of Public Health (Amy Brownell)</b> |      |  |   |
| <b>GENERAL COMMENTS</b>  |      |  |   |
| 1.   |      | As was discussed at the January 2009 BCT meeting, there are some outstanding issues concerning the sewer and storm drain removals at Parcel D-2. The Navy must resolve these issues to the satisfaction of the regulatory agencies, including finalizing the Parcel D-2 Removal Action Completion Report (RACR), prior to issuing the Final ROD for No Action at Parcel D-2. | The revised Parcel D-2 RACR was submitted on February 12, 2010. DTSC and CDPH concurred with the revised Parcel D-2 RACR on August 9, 2010. |



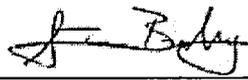
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Contract No. N62473-07-D-3213

Document Control No. CHAD-3213-0030-0023

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

DATE: 9/1/10  
CTO: 0030  
LOCATION: Hunters Point Shipyard, San Francisco, California

FROM:   
**Steven Bradley, Contract Manager**

DOCUMENT TITLE AND DATE:

**Responses to Comments on Draft Final Record of Decision, Parcel D-2**  
**August 9, 2010**

TYPE:  Contractual Deliverable  Technical Deliverable (DS)  Other (TC)

VERSION: N/A REVISION #: N/A  
(e.g., Draft, Draft Final, Final)

ADMIN RECORD: Yes  No  CATEGORY: Confidential

SCHEDULED DELIVERY DATE: 9/1/10 ACTUAL DELIVERY DATE: 9/1/10

NUMBER OF COPIES SUBMITTED TO NAVY: 0/7C/9E/7D

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