



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

Gavin Newsom, Mayor  
Mitchell H. Katz, Director of Health

Rajiv Bhatia, M.D., M.P.H.  
Director of Environmental Health

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HUNTERS POINT  
SSIC NO. 5090.3.A

September 24, 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 Final Record of Decision for Parcel C, Hunters Point Shipyard, dated August 13, 2010.**

This letter contains comments from the City and Lennar.

Specific Comments

1. **Section 2.4, third sentence:** The mention of "human health risk evaluation" seems unnecessary and makes the sentence confusing. Suggest the following revision to make the sentence clear and concise:

In 2010, the SFRA issued an amendment to the 1997 reuse plan which revised the reuses in Parcel C to show "Land Use Districts" within the area corresponding to the current Parcel C, as "HPS Shoreline Open Space" which is open space reuse ~~scenario for human health risk evaluation~~; and "Shipyard North Residential," Shipyard Village Center Cultural," and "Shipyard Research and Development," which are residential reuses."

2. **Section 2.7, Page 40. Soil RAOs:** Please revise as indicated below as ingestion of produce grown in native soil should not be restricted only to residents or specific redevelopment blocks:

1. Prevent or minimize exposure to organic and inorganic chemicals in soil at concentrations above remediation goals developed in the HHRA for the following exposure pathways:

- (a) Ingestion of, outdoor inhalation of, and dermal exposure to surface and subsurface soil.
- (b) Ingestion of homegrown produce in native soil ~~by residents in mixed-use and research and development blocks.~~

3. **Section 2.9.2, Page 55, first paragraph:** Figure 10 shows three areas as needing excavation within what appears to be the building footprint outline. However, the text in this paragraph only describes two excavations under buildings. We questioned this discrepancy in our last set of comments.

Based on your RTC about excavation 20A-1, please add the following after the sentence that ends with "...radiological removal activities."

"The planned excavation 20A-1 on Figure 10 is not listed as an excavation beneath an existing building because it is located under an extended roof overhang area not under the building."

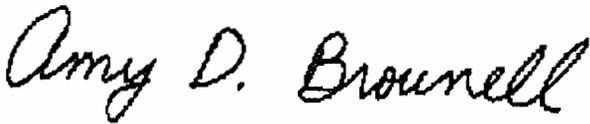
Alternatively, you could revise Figure 10 so that excavation 20A-1 is marked differently so that it is clear that it is not under a building.

4. **Section 2.9.3, first paragraph, last sentence:** Please add the following after the last sentence. The 2010 amended land uses<sub>(16)</sub> will be evaluated in the RD.

Minor Comment

5. **Page 18 second paragraph first line:** (UST) should be plural - (USTs).

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  
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Jeff Fenton, Mactec  
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**From:** Hunt, Bob A CTR OASN (EI&E), BRAC PMO West [robert.a.hunt2.ctr@navy.mil]  
**Sent:** Friday, September 24, 2010 12:52 PM  
**To:** Ono, Yohji  
**Subject:** FW: City Lennar comments on draft final Parcel C ROD  
**Attachments:** City Lennar Comments draft final C ROD.pdf  
**Signed By:** robert.a.hunt2.ctr@navy.mil

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

From: Kayaci, G Hamide CTR OASN (EI&E), BRAC PMO West  
Sent: Friday, September 24, 2010 9:46  
To: Hunt, Bob A CTR OASN (EI&E), BRAC PMO West  
Subject: FW: City Lennar comments on draft final Parcel C ROD

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

From: Amy Brownell [mailto: Amy.Brownell@sfdph.org]  
Sent: Friday, September 24, 2010 9:44  
To: Michael Cohen; JJFenton@mactec.com; drathnayake@mactec.com; RBrandt@Geosyntec.com; stephen.proud@lennar.com; JAustin@Geosyntec.com; Suzanne.Hudson@lennar.com; gordonhart@paulhastings.com; erickahailstockejohnson@paulhastings.com; LRHENDRY@mactec.com; JAB@BCLTLAW.com; Elaine Warren; Thor Kaslofsky; Tiffany Bohee; 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; Whitcomb, James H CIV NAVFAC SW; Leslie.Lundgren@CH2M.com; Urizar, Lara L CIV NAVFAC SW  
Subject: City Lennar comments on draft final Parcel C ROD

Keith:

Please see attached comments on draft final Parcel C ROD

thanks,

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