

Bureau of Environmental Health Management

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August 30, 1995

*Rec'd  
9/8/95  
mcm*

Mr. Michael McClelland  
Department of the Navy  
Engineering Field Activity West  
Naval Facilities Engineering Command, Code 62.3  
900 Commodore Way, Building 105  
San Bruno, CA 94066-2402

**Subject: SFDPH Comments on the Navy's Draft Final Proposed Plan for Parcel A**

Dear Mr. McClelland:

We have reviewed the draft final proposed plan for Parcel A and have the following comments. As proposed by the the Navy, the difference between the "no action" alternative versus a "limited action" alternative (as described in the Parcel A RI/FS) is the deed notification and the abandonment (closing) of wells on Parcel A. The Navy should properly abandon the wells on Parcel A regardless of the decision it makes for the proposed plan and the well abandonment should not be part of the proposed plan decision. The proper abandonment of all wells on Parcel A should be considered part of completing the environmental cleanup and properly closing the site. Contaminated sites under the oversight of the Department of Public Health are issued final closure notices only when well abandonment has been completed, as required under California Well Standards, Bulletin 74-90. These standards should be considered an ARAR for the Navy on Parcel A.

The well abandonment should not be a factor in the proposed plan, because it has no impact on environmental contaminants or exposures. The wells themselves are not contributing to or reducing environmental contaminants or exposures, they are just a way to monitor and take samples of the groundwater. If left in place, wells can become conduits for further groundwater contamination (e.g., if someone accidentally pours something down the wells) and therefore are required to be properly removed in order to complete closure of a site. The only reason to consider leaving the wells in place is if the San Francisco Redevelopment Agency (SFRA), as part of the reuse planning, is interested in keeping and reusing these wells on the property. The Navy should discuss this issue with the SFRA.

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As far as the deed notification is concerned, we understand from the Regional Water Quality Control Board's (RWQCB) comments of July 27, 1995, that the RWQCB has requested that deed notification be included as part of the Navy's proposed plan. RWQCB staff also stated that they will work with City and Navy staff to draft acceptable language that meets all parties needs. The Navy should consult with the SFRA and the City Attorney to draft deed notification language that will be acceptable to all parties.

In addition to these comments about the overall proposed plan, we have a concern with the statements on page five concerning the risks from ingestion of fruits and vegetables. An example is given comparing the risk to that of a child eating 30 pounds of fruits and vegetables grown at the site each year. If you are going to have such an example you should describe why this scenario is unlikely or why it is not of concern and give a comparison of the amount of fruit and vegetables that an average child eats per year.

If you have any questions about these comments please contact me at (415) 554-2778.

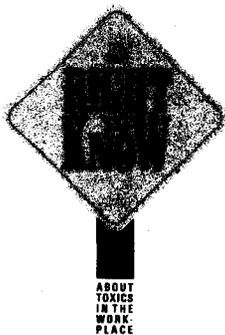
Sincerely,



Amy Brownell, P.E.  
Site Mitigation Engineer

cc: Claire Trombadore, USEPA  
Cyrus Shabahari, Cal/EPA  
Richard Hiatt, RWQCB  
Bill Lee, CAO  
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