

Arc Ecology

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Commanding Officer
Engineering Filed Activity, West
Naval Facilities Engineering Command
(Attn.: Mr. Richard Powell, Code 1832)
900 Commodore Drive
San Bruno, CA 94066-5006

RE: Comments on the Parcel D Draft Feasibility Study Report (DRAFT)

Dear Mr. Powell:

Arc Ecology reviewed the Draft Parcel D Feasibility Study (FS), and offers the following comments.

The Navy should clearly state in the FS that remediation to an industrial level in fact imposes a long-term reuse restriction on the parcel and that industrial-level cleanup will result in a deed restriction.

Is it accurate, as stated on page ES-4, that only one soil cleanup goal scenario will be selected for Parcel D?

How many sites within Parcel D are contaminated only with total petroleum hydrocarbons (TPH)?

Paragraph 2 on page 2-3, describing the scope of industrial activity in the Hunters Point/Bayview neighborhood, contributes nothing to the FS except to attempt to make the case that remediation of Parcel D should be pursued to industrial standards only. Communities do change over time. Just because a community has in the past hosted industrial activities does not mean that they should be forced to continue to host them in the future. We suggest that this paragraph be removed.

Paragraph 2, page 2-8 states that monitoring wells in the B-aquifer were recently installed in Parcel D. How will data collected from these wells be incorporated into this Feasibility Study, the proposed plan for Parcel D, and the Remedial Design? Will potential communication between the A and B- and bedrock aquifers be explored? Are there abandoned wells on the base that may connect these aquifers?

Since the Human Health Risk Assessment considers risk to future workers or residents, the same should hold true for risk to flora and fauna. We think it is inappropriate to dismiss risks to ecological receptors with the statement on page 2-42 that "With little open space for flora and fauna, Parcel D is considered to have insignificant habitat value and therefore poses an insignificant risk to terrestrial receptors." The Navy makes a similar statement on page 3-2. We believe that risk to future terrestrial receptors (after redevelopment) should be evaluated at least qualitatively. For example, would there be compounds remaining on Parcel D after remediation that are known to bioaccumulate, can be easily uptaken by trees and plants, or are known to transform into more toxic compounds under certain environmental conditions? Are there nearby populations of endangered plants and animals that may recolonize the area after redevelopment?

In Section 3, it would be helpful to explain that excess lifetime cancer risks (ELCR) referred to in the National Contingency Plan (NCP) are based on the reasonable maximum exposure (RME) assumptions.

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On page 3-2, the Navy proposes to apply soil cleanup criteria to all contaminated soils between the soil surface and 10 feet below ground surface which show an ELCR of greater than 10^{-4} . We assume you meant ELCR of between 10^{-4} and 10^{-6} . If contamination remains in place below 10 feet, will deed restrictions be required?

To protect groundwater quality, the Navy proposes removing soils contaminated above remedial action objectives (RAO) that occur at depths between 10 feet below ground surface and groundwater. What if soil contamination is found to extend below the surface of the water table in areas contaminated below 10 feet below ground surface?

Page 3-4 states that "the fraction of seafood potentially ingested from the HPS vicinity is expected to be very small." Please justify and reference this statement. The Environmental Justice Executive Order 12898, dated February 16, 1994, states that "federal agencies, whenever practicable and appropriate, shall collect, maintain, and analyze information on the consumption patterns of populations who principally rely on fish and/or wildlife for subsistence. Federal agencies shall communicate to the public the risks of those consumption patterns." We suggest that this justification be removed from the FS and that the pathway be excluded only on the basis that sampling reveals that chemicals of potential concern were not detected off-shore from Hunters Point above bay-wide averages.

On page 3-7 the Navy states that RAOs can be achieved by eliminating the exposure pathway or by reducing the concentration of the contaminants of concern. While both strategies have their place, Arc Ecology encourages greater emphasis on removing the sources of contamination. This will allow for more flexible reuse over the long term.

Page 3-13 refers to City Reuse Plan designations, one of which the Navy lists as "mixed commercial." The proper designation is "mixed use" which includes business services, retail, artists studios, live/work, and residential.

Page 3-19 refers to on site disposal of some soils at the IR-1/21 landfill. While this option has the potential to significantly reduce truck traffic through Bayview/Hunters Point as satisfies EPA's desire for on site treatment and disposal, we would like to see more thorough analysis of the feasibility of capping the Parcel E landfill. Rather than assuming in each Hunters Point Shipyard FS that the Parcel E landfill will be capped, we suggest that the Navy prepare and circulate for public and regulatory comment, a technical memorandum that justifies capping the Parcel E land fill and describes required long-term monitoring and controls. Only once the regulators and community agree that capping the landfill makes sense, and is legal, is the Navy free to assume that treated soils may be placed there. This approach is being pursued at Mare Island. Without this detailed forethought, placing cap material on the Parcel E landfill before the Parcel E ROD could increase costs to remediate the landfill, and/or create a need for the Navy to stockpile large quantities of soil for an indefinite period.

Page 3-27 introduces thermal desorption technologies. The Navy assumes in the Parcel D FS that thermal desorption will be operated at temperatures just high enough to evaporate volatiles and purgable TPHs, and that SVOCs will be treated using soil solidification. The Navy goes on to state that this is considered a conservative approach. Furthermore the lower temperatures would limit the requirement to treat an air stream containing PCBs and pesticides allowing VOCs to be destroyed using a catalytic oxidizer. The Parcel D FS goes on to state that "desorbing PCBs and pesticides and subsequent gas treatment can be problematic" (page 4-14). Yet the Parcel B FS recommends high temperature thermal desorption to treat both VOCs and SVOCs, followed by soil solidification. And in fact the Navy has selected high-temperature thermal desorption/ soil solidification as the preferred remedial alternative for Parcel B. Why do the reports start with different assumptions when evaluating thermal desorption? Which strategy should we believe?

We are concerned that the Feasibility Study lacks sufficient detail for us to evaluate the various alternatives from a community acceptance perspective. Specifically, we ask that "Section 5.0 Detailed

Analysis of Soil Remedial Alternatives” present more specific and detailed information in response to the seven criteria used for evaluating the alternatives. For example:

- Estimated volume of soils contaminated with VOCs scheduled to be excavated under each alternative at Parcel D. How will vapor emissions be monitored and controlled?
- Comparison among alternatives as to magnitudes of short-term health risks to base workers and to the Bayview/Hunters Point community
- Magnitude of truck traffic for each alternative
- Whether the treatment option is tried-and-true under Parcel D-type conditions or experimental; contingencies should the proposed treatment technology fail. Typical cost and performance data. Case studies.

Can soil solidification/stabilization control SVOCs over the long run? Please present specific information/case studies.

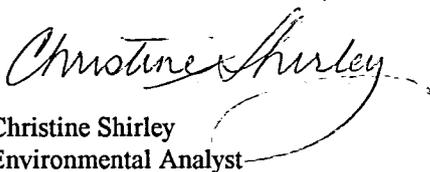
On page 5-7, the Navy states that “The soil cleanup goal scenario selected should consider that background metal concentrations exceed an ELCR of 10^{-5} and it is not possible to remove all soil.” Why is it necessary to consider the background risk due to metals when selecting cleanup goals? Background concentrations of metals have already been incorporated into the RAO scenarios. As a result, even if Parcel B is cleaned according to cleanup scenario 3, the 10^{-5} background risk due to metals will remain. To sum up, we oppose the idea that background risk should be considered when selecting a cleanup goals scenario for Parcel D.

During the time that the Navy will be engaging in remedial work, parts of the Shipyard will be leased to several hundred tenants. Building 606 on Parcel D, for example, is scheduled to be leased to the City of San Francisco Police Department, who are, in turn expected to place 300 to 400 officers there. How will the health and safety of these workers be protected during remedial activities? Will treatment technologies and stockpiles be engineered and placed to minimize potential exposures to workers stationed in leased buildings? How will non-remediation workers on base be notified when air monitoring equipment reveals potentially hazardous emission levels? Will remedial activities be timed to limit exposures to non-remedial workers (i.e. technologies started and tuned, when emissions could be highest, at times when worker populations are lowest)? Treatability studies should also consider potential hazards to non-remedial workers arising from planned and unplanned fugitive emissions, in addition to cost-effectiveness and optimal performance parameters.

Please provide the calculation worksheets for the tables presented in “Appendix E: Estimated Costs.”

Thank you for the opportunity to comment of this Draft document. We look forward to your letter reply and response in the Responsiveness Summary published with the Draft Final Parcel D Feasibility Study.

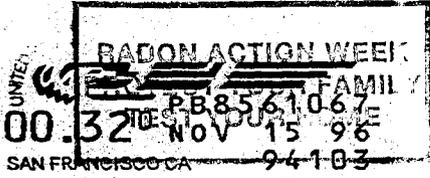
Sincerely,


Christine Shirley
Environmental Analyst

Cc: Saul Bloom, Arc Ecology
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