



July 1, 1997

Cal/EPA

Department of
Toxic Substances
Control

Commanding Officer
Engineering Field Activity, West
Attention: Code 18, Mr. Richard Powell (1832)
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-5006

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

700 Heinz Avenue
Suite 200
Berkeley, CA
94710-2737

RE: Preliminary Draft Final Parcel B Record Of Decision, Hunters Point Shipyard, San Francisco, California

Dear Mr. Powell:

The Department of Toxic Substances Control and Regional Water Quality Control Board have completed review of above document and are providing following comments for your consideration.

Issues and Comments on Parcel B Preliminary Draft Final-ROD

1. Under 1.4 Description of selected remedy, page 2, following underlined language should be added.
The major components of the selected remedy for soil are as follows:
 - * Excavation of contaminated soil up to 10 feet in depth.
 - * Deed restrictions prohibiting any disturbances of contaminated soil below 10 feet underground without signatory agencies' approval.
 - * Deed restriction prohibiting any future development of potential terrestrial habitats without signatory agencies' approval.

ISSUE: Current proposed remedy calls for excavation of contaminated soil up to 10 feet in depth. Contaminated soils below 10 feet are allowed to remain in ground is based on the assumption that no human exposure pathway under residential scenario. However, contaminated soils beneath 10 feet in ground may be surfaced during construction activities and it needs to be evaluated prior to the commencement of the construction. The issue related to terrestrial habitats is the terrestrial ecological assessment was not performed based on the assumption that current site condition (pavement and buildings cover the entire parcel) will be maintained or at least replaced with similar level of density of human activities that no terrestrial habitat can and will exist. The deed restriction prohibition is necessary to ensure the assumption is carried through future planning

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Ground water monitoring data will be compared to (10) times the national ambient water quality criteria (NAWQC) . . . and (10) times the ambient concentrations of metals.

ISSUE: the assertion of the trigger levels and contingent action plan were requested by the DTSC. The purpose was to ensure an end point for the monitoring program where, ideally, a target concentration (or a trigger level equivalent to a cleanup level in this case) can be set at the point of compliance (in this case, the most up gradient boundary of tidal influence zones) and all parties can agree on certain action will take place if the target concentration is exceeded. Conversely, if monitoring after a long period of time shows no exceedance, an assessment of the further monitoring can be made easier. However, the BCT has decided it would be more preferable to monitor groundwater some distance up gradient from the point of compliance to provide a minimum of five-year buffer zones before the plume actually reaches the point of compliance. The distance of the five-year buffer zone and its corresponding trigger levels are to be determined by a groundwater modeling effort in the remedial design phase. As an alternative, the Navy is proposing to set the trigger level at 10 times of NAWQC or HGAL in ROD and it will be modified if groundwater modeling shows otherwise. DTSC would like to see the Navy to provide some rationale as to how the multiplier (10) is coming from. DTSC feels this multiplier should be chosen on the conservative side as this will be the default level if groundwater modeling effort is unsuccessful. Some text should also be added to specifically spell out the intent of keeping a five-year buffer zone.

2
p.

1.4 Description of the selected remedy, Page 3. the following underlined language should be added.

- * Orally notify the signatory (regulatory) agencies within 15 days of any exceedance of the groundwater monitoring criteria followed by a written notice to the signatory agencies within 15 days of the oral notification.
- * At the written request of one or more of the regulatory agencies, develop a proposal for the signatory agencies' approval as to what should be done to address the exceedance, which may result in a change in the remedy.

During the RD phase, . . . Once these site-specific criteria re developed and approved by the signatory agencies, they will replace the 10 times default criteria as the trigger for taking the actions listed above.

3. The signature block for Anthony Landis should read:

Anthony J. Landis, P.E.
Chief
Northern California Operations
Office of Military Facilities
California Department of Toxic Substances Control

If you have any questions, Please contact me at (510) 540-3822.

Sincerely,



Chein Ping Kao, P.E.
Senior Hazardous Substance Engineer
Office of Military Facilities

Enclosure

CC: Ms. Claire Trombadore/Ms. Sheryl Lauth
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75 Hawthorne Street
San Francisco, California 94105-3901

Mr. Richard Hiatt
California Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, California 94612



Pete Wilson
Governor

**San Francisco Bay
Regional Water Quality Control Board**

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June 30, 1997

VIA Facsimile
510.540.3819
Mr. Chein Kao
DTSC, Office of Military Affairs
700 Heinz Avenue
Berkeley, CA 94710

RE: Parcel B Preliminary Draft Final Record of Decision
dated June 3, 1997

Dear Mr. Kao:

Regional Board staff have reviewed the aforementioned report and have the following comments:

1. The deed restriction should include information about the lining of the storm water conveyance system. The deed restriction on groundwater should specify to what depth (i.e. All water found within the shallow water bearing zone(s) to forty feet below ground surface). Additionally, a similar description should also be included in portions of the text which describe beneficial use of groundwater.

2. Page 26, Ecological Risk Assessment, After the sixth sentence, Please consider: "Therefore, with the possible exception of IR-07, groundwater impacted with CERCLA substances does not pose a threat to aquatic receptors. Risks to aquatic receptors posed by petroleum are being evaluated separately under the basewide petroleum corrective action plan.

3. It is not clear how the 10 times default criteria were developed for groundwater. Please present your rationale.

Sincerely,



Richard Hiatt, AWRCE
Groundwater and Waste Containment Division