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Ser 1832.2/L7251  
29 Aug 1997

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering Command

To: U.S. Environmental Protection Agency (Attn: Ms. Claire Trombadore)  
California Department of Toxic Substances Control (Attn: Mr. Chein Kao)  
California Regional Water Quality Control Board (Attn: Mr. Richard Hiatt)

Subj: COMPLETION OF PARCEL D FEASIBILITY STUDY, ENGINEERING FIELD ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Encl: (1) Navy Response to Environmental Protection Agency 17 April 1997 Comments on the Draft Final Parcel D Feasibility Study, Hunters Point Shipyard, San Francisco, California

1. Enclosure (1) contains the Navy's responses to the Environmental Protection Agency (EPA) comments on the Draft Final Parcel D Feasibility Study Report. We plan to address the issues raised in these comments within the enclosed responses, or in future CERCLA documentation for Parcel D. It is our understanding from discussions at the 6 May 1997 Hunters Point Shipyard BRAC Clean-up Team meeting, that the California Department of Toxic Substances Control did not find it necessary to provide written comments on the Draft Final Parcel D Feasibility Study. The EPA comments and responses to the comments should be placed at the end of Appendix F of the Draft Final Parcel D Feasibility Study Report.

2. The Navy appreciates the Agencies' efforts to reduce the volume of reproduction that is required for full document revisions. This enclosure completes the Parcel D Feasibility Study Report.

3. If you have any questions regarding this enclosure, please contact Mr. William Radzevich, Code 1832.2, at (415) 244-2555.

**Original signed by:**

RICHARD E. POWELL  
By direction of  
the Commanding Officer

Copies to:

City and County of San Francisco Dept. of Public Health, Bureau of Toxics  
(Attn: Ms. Gina Kathuria)

San Francisco City Attorney (Attn: Ms. Elaine C. Warren)

RAB Member: ARC Ecology (Attn: Mr. Saul Bloom)

PRC Environmental Management (Attn: Mr. James Sickles, w/o encl)

Roy F. Weston, Inc. (Attn: Ms. Karla Brasaemle)

Kern Mediation Group (Attn: Mr. Douglas Kern)

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**RESPONSE TO AGENCY COMMENTS**  
**PARCEL D - DRAFT FINAL FEASIBILITY STUDY**  
**HUNTERS POINT SHIPYARD - SAN FRANCISCO, CALIFORNIA**

**RESPONSE TO COMMENTS FROM U.S. ENVIRONMENTAL PROTECTION AGENCY**

Specific Comments

1. **Comment:** Section 3.1.1.3. This section covers the same subject as Section 3.1.2.5. The discussion in Section 3.1.2.5 provides better detail and should replace Section 3.1.1.3.

**Response:** Section 3.1.1.3 is provided to discuss groundwater monitoring used to support RAOs for soil. Section 3.1.2.5 discusses groundwater monitoring used to support RAOs for groundwater and will assure water quality criteria are met at the tidally influenced zone. The Navy will ensure that the groundwater monitoring description contained in the remedial design for Parcel D will be clearly defined. Additionally, language agreed upon in the Parcel B ROD will be used for groundwater monitoring descriptions.

2. **Comment:** Section 3, Specific Comment 20. Benzoic acid was eliminated from the tables, not revised as stated in the comment response. Please clarify why this compound was removed from the table.

**Response:** Benzoic acid was not detected in soil samples collected at Parcel D, therefore, it was eliminated from the revised Tables 3-2a through 3-2c. The tables shown in the Draft Final Parcel D FS have been revised to list only those compounds detected in soil at Parcel D.

3. **Comment:** Section 4, Alternative 2, Groundwater Monitoring. IR-36S is listed as an area of concern, but is not indicated as an area of concern in Section 3.1.2.4. Please clarify.

**Response:** Between the submittal of the Draft and Draft Final of the Parcel D FS, it was decided by the BCT to move IR-36 into the Parcel E FS. This IR-36 has been removed from the scope of the Parcel D FS. Any remedial activities or monitoring will be proposed under the Parcel E FS.

4. **Comment:** Section 4, Alternatives 4 and 5. Although mitigative measures and groundwater monitoring have been included as the components of the alternative, they have not been included in the detailed description of the alternative. Why not?

**Response:** Mitigative measures and groundwater monitoring were discussed in detail under Alternative 2 (Section 4.3.2), and are not repeated again for each alternative to avoid

redundancy. Sections 4.3.4 and 4.3.5, which describe Alternatives 4 and 5 respectively, refer to Section 4.3.2 for the requested discussion.

5. **Comment:** Section 4, Figure 4-2. The description of the allowable concentrations at the monitoring well needs to be reviewed. Please clarify whether the concentration is allowed to be "greater" than the HGAL adjusted concentration to account for additional factors associated with distance "x". Upon review it did not appear that this point was clear in the text of Section 4.

**Response:** The quarterly results from sentry wells will be compared against trigger concentrations for chemicals of concern at Parcel D and will follow procedures established in the Parcel B ROD. The trigger concentration for each well is equal to the HGAL-adjusted criteria multiplied by a DAF that is calculated based on the distance from the sentry well to the inland edge of the tidally influenced zone.

6. **Comment:** Appendix D, Table D-2. The second column contains inconsistencies in the values reported. For instance, the second column of Table D-2e indicates lead = 7.6. The fourth column says lead was detected at a concentration of 1,800 mg/kg. Please explain what the 7.6 represents. Please check to ensure that the tables in Appendix D are consistent.

**Response:** For the entry in the second column of Table D-2e that stated "lead = 7.6"; the value of 7.6 is the exposure point concentration (EPC) for lead in mg/kg calculated in the human health risk assessment (HHRA) for exposure area AU19. This entry was incorrect and the correct entry should be "Lead = 1,800 mg/kg". The value of 1,800 mg/kg is the detected concentration of lead rather than the EPC. Similar inconsistencies have been identified in the following tables:

Table D-2j: under the second column for exposure area AR32 under de minimus areas - the entry of "Lead = 9.2" should be "Lead = 1,400 mg/kg"

Table D-2l: under the second column for exposure area BG30 under de minimus areas - the entry of "Lead = 5.1" should be "Lead = 1,400 mg/kg"

Table D-2o: under the second column for exposure area BG30 under de minimus areas - the entry of "Lead = 5.1" should be "Lead = 1,400 mg/kg"

Table D-3g: under the second column for exposure area AU19 under de minimus areas - the entry of "Lead = 7.6" should be "Lead = 1,800 mg/kg"

Table D-3s: under the second column for exposure area BG30 under Remediation Area 53-1 - the entry of "Lead = 5.1" should be "Lead = 1,400 mg/kg"

Table D-3x: under the second column for exposure area BH30 under Remediation Area 69-1 - the entry of "Lead = 5.1" should be "Lead = 1,400 mg/kg"

**7. Comment:** Appendix D, Tables D-5a through c. Please explain the basis for the revised soil volumes for the scenarios. Some changes were easily understood (e.g., revising excavation depths based on new assumptions). However, in other cases remediation areas have been removed and switched to de minimus areas with not much (if any) explanation other than the revised definitions (provided in Appendix D) of how the areas are going to be categorized. Please explain why areas have been removed or reclassified as de minimus areas.

**Response:** In general, the revised soil volumes for the scenarios between submittal of the Draft Parcel D FS and the Draft Final Parcel D FS are based on the following:

- A revised and more consistent approach was used in the Draft Final Parcel D FS in developing soil volumes and in defining areas as RAs, de minimus cleanup areas, or areas that do not require further action. This new approach was derived in response to Agency comments on the Draft Parcel D FS.
- Based on revisions to the Draft RI human health risk assessment (HHRA), numerous compounds (including metals and SVOCs) were removed as COPCs and several changes were made in the values of both the total hazard index (HI) and excess lifetime cancer risk (ELCR) for exposure areas.
- Additionally, some interpolation of data points was used to classify and/or correct remedial areas.