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**San Francisco**  
**Department of Public Health**

Edwin M. Lee  
*Mayor*

November 9, 2011

Barbara Garcia MPA  
*Director of Health*  
Rajiv Bhatia MD, MPH  
*Director*

Mr. Keith Forman  
BRAC Environmental Coordinator  
Hunters Point Shipyard  
Southwest Division  
Naval Facilities Engineering Command  
1455 Frazee Road, Suite 900  
San Diego, CA 92108

**Comments on Draft Treatability Study Completion Report for RU-C5  
Building 134 (Volumes I and II), Hunter's Point Naval Shipyard, San  
Francisco, dated 11 October 2011**

This letter contains comments from the City.

1. Please consider providing an explanation, if available, as to why the EHC appears to have been successful in enhancing the biological degradation of contaminants, but showed very little abiotic degradation. This is an odd phenomenon given that the ZVI component of EHC is relatively fast-acting (short contaminant half-life), while the biological reagent typically works more slowly. One would have expected a large abiotic component right away with the biological component lagging behind.
2. They Navy should consider providing a recommendation for addressing rainwater infiltration into the thermal treatment zone for use of this technology at Hunters Point or any other site in the future. Would placement of an impermeable membrane on the ground surface solve this issue?
3. Please consider adding as a lesson learned that thermal heating should not be placed above an active anaerobic biological treatment zone, due to the possibility of flammable methane entering the thermal treatment area. At minimum, it appears that methane monitoring should be implemented when trying to use these technologies in proximity to each other in the future.



**Hunter's Point Shipyard  
Program**

1390 Market Street  
Suite 410

San Francisco, CA 94102

Phone 415.252.3967

Fax 415.252.3889

[www.sfenvironmentalhealth.org](http://www.sfenvironmentalhealth.org)

Sincerely,

*Amy D. Brownell*

Amy D. Brownell, P.E.  
Environmental Engineer

cc: Melanie Kito, Navy  
Leslie Lundgren, CH2M Hill  
Hamide Kayaci, Navy  
Craig Cooper, USEPA  
Karla Brasaemle, TechLaw  
Ryan Miya, DTSC  
Ross Steenson, RWQCB  
Wells Lawson, Mayor's Office  
Jeff Austin, GeoSyntec  
Jeff Fenton, AMEC  
Dorinda Shipman, Treadwell & Rollo | Langan