



ECDC
ENVIRONMENTAL L.C.

AN ALLIED WASTE COMPANY

April 30, 1998

Mr. Michael McClelland
Department of the U.S. Navy
900 Commodore Way - Bldg. #105
San Bruno, CA 94066-2402

*MEM Reck
5/4/98*

Re: Comments on Parcel E Feasibility Study Draft Report

Dear Mr. McClelland:

We have recently reviewed the Feasibility Study Draft Report for Parcel E at the Hunters Point Naval Shipyard. Parcel E is the most significant parcel currently being evaluated for remedial action at Hunters Point. We were disappointed to find that, like parcel B the push once again is to contain toxic materials onsite. It is our understanding that the Navy is being advised to leave the landfill intact due to the mystery of what lies underneath and the high cost of removing the toxic and radioactive waste from HPS. Yet we do not believe that the Feasibility Study adequately addresses either long term impacts of leaving these materials on-site nor the true costs of both on-site containment and off-site removal. From our experience implementing similar remediation and restoration projects, PRC has underestimated the costs of on-site containment and overestimated the costs of removal to an off-site facility.

Parcel A and Parcel B should set a standard for the rest of the Hunters Point Naval Shipyard. Cleaning up the site so that there is not a future health concern for occupants and neighbors is the most responsible and most cost-effective in the long term. There are organizations, such as ours, that do this type of cleanup on a daily basis that would provide the Navy, PRC and IT with firm numbers for transportation and disposal based on volume and levels of contamination. The Navy would be well advised to seek competitive bids for the cleanup of parcel E.

Questions of Concern:

Is there an accurate waste characterization for parcel E?

What would be the health risks of leaving this landfill in place over the next 100-200 years?

What are the true costs of leaving the material in place versus excavation and off-site disposal?

What will the costs be if long-term treatment and disposal is required for the wastewater filling the base of the wall if it can not be disposed at the local POTW?

The above are some preliminary comments and issues from our review of the Draft Report. We would like to reserve the right to further comment once the Feasibility Study has been completed. Thank you in advance for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "David A. Gavrich". The signature is written in black ink and is positioned above the typed name.

David A. Gavrich
Regional Director
ECDC Environmental, LC.