

**San Francisco
Redevelopment Agency**

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HUNTERS POINT
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450-03698-000

May 7, 1998

Captain Ernest Hunter, Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-5006

Dear Captain Hunter:

**Subject: Comments on the Navy's Response to Comments on the Draft Parcel D
Record of Decision**

On behalf of the San Francisco Redevelopment Agency, the Department of Public Health and the City Attorney's Office have reviewed the Navy's Response to Agency Comments on the Draft Parcel D Record of Decision. Our comments on this document and general issues about the Parcel D Record of Decision are provided below.

General Comments:

The City understands that the Navy has agreed to remediate soil at Hunters Point Shipyard to a depth of 10 feet below ground surface, regardless of the depth to groundwater. This change should be reflected in all areas of the document, including narrative descriptions and the tables showing quantities of soil to be excavated and costs for excavation.

The City intends to include residential uses in the mixed use area of Parcel D. The Navy has not adequately responded to questions about the Navy's conclusion that the mixed use area meets a residential 1×10^{-6} standard when no sampling has been conducted in this area. Given that the Navy has not investigated this area, other than a review of available information to identify contaminated sites, how will the Navy make and support the statement, as it does on page 1 of its response, that IR-37 and an area without IR designation meet a residential 1×10^{-6} standard that is appropriate for mixed use? Similarly, how will the Navy support the statement that "the ROD addresses both soil and groundwater contamination for CERCLA hazardous substances at Parcel D" as stated on page 31, when sampling has not been conducted? At the very least, such statements are misleading. The City does not believe that a "default" characterization based on a lack of knowledge is appropriate. Nor does the City believe that the burden of investigation should be shifted away from the Navy. Finally, as a point of clarification, did the Navy include tenants' activities in its preliminary assessments? If not, why not?

The 1,000 mg/kg industrial PRG for lead is not appropriate for the mixed use area, which will include residential uses. What cleanup standard will the Navy use for lead in the mixed use area?

The City has continuing concerns about the groundwater remedy. The Navy implies that groundwater cannot be used due to quantity and quality problems unrelated to contamination (i.e., "natural low quality," "insufficient yield," "low fresh water recharge," "high salinity").

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Groundwater that exhibits these qualities need not be deed restricted. Absent the presence of contamination that warrants a deed restriction, the City is opposed to the imposition of a deed restriction essentially based on infeasibility or natural conditions. This is especially important since any deed restriction will substantially inhibit future development. If groundwater is not contaminated, there is no rationale basis to restrict its use. If groundwater is contaminated such that exposure or use raises health or environmental problems, then the document needs to identify the characteristics of the contamination that warrant the need for the deed restriction.

Specific Comments:

Page 3 Response to General Comment 3 of the USEPA: The table presented in the response shows a per yard cost for Scenario 2 less than for Scenario 1, is this correct? On that same table, not all IR sites are included in the analysis (IR-16, 17, 48, 66, 67, and 71 are missing). Why were these IR sites excluded from the analysis?

Page 8, Comment 7: a) Figure 6 of the draft ROD does not show the point of compliance wells, please add them. b) The illustration around IR-38 and IR-39 is misleading. It appears as if the buffer zone and tidal influence zone are just a tiny little triangle unattached to anything else. The reality is they are connected to Parcel E. It would be better to show the continuation of these zones into Parcel E (maybe in a lighter shade) including the sentinel and point of compliance wells in Parcel E, so that the continuous nature of the remedies for the whole site can be understood by the reader.

Page 9: The answer to EPA's question of when the storm drain infiltration study will be done is not clear. When is the "data gap workplan" going to be done? Is this envisioned as part of the remedial design documents or as part of a completely separate process? If separate, will it result in its own ROD?

Page 17, Comment 1, item 6 (also reiterated on Page 20, Comment 9 and Page 36, Comment 14): This item states that the seawalls, sheetpiles, and piers need to be maintained to prevent tidal influence. Is the Navy going to pay for the maintenance? Since the Navy is using these structures as part of its remedy and installing some of its POC wells in relation to these structures shouldn't the Navy be responsible for maintaining the structures? If these structures are breached, won't that essentially change the remedy and require the installation of new POC and buffer zone wells? Does anyone know whether some of these structures haven't already been breached and created a tidally influenced area where we thought there was none?

Page 27, Comment 3: The educational/cultural complexes are to be used by everyone, adults and children, not just adults. Does the Navy have a list of specific uses that they have identified in their risk assessments as being inappropriate for commercial/industrial areas? We know that housing would be inappropriate, but do they have other uses such as day care centers that are specifically excluded based on their exposure scenarios? We are not suggesting that the Navy should be in the business of land use planning, we are just interested in the assumptions that are being used in the risk assessments.

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Page 45: As announced in April, the depth of cleanup has been changed back to 10 feet. Please modify this and any other reference to this issue.

Pages 47 and 52: Please provide more information on the risk assessment being performed on the short term risks posed to construction workers by contaminated groundwater. When will this information be available?

Pages 53 and 54: The Navy states that Alternative 2 does not require continued operation and maintenance. Does this mean that the Navy does not intend to maintain the 1) seawalls, sheetpiles, and piers, 2) pressure grouting in storm drain bedding materials, and 3) liners in storm drains even though these structures are all part of the groundwater remedy under Alternative 2?

Thank you for the opportunity to comment on this document. If you have any questions about this letter, please contact Amy Brownell at 415-252-3967.

Sincerely,



Byron Rhett
Senior Project Manager
Hunters Point Shipyard

cc: Richard Powell, EFAW
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