



California Regional Water Quality Control Board

San Francisco Bay Region

N00217.003807
HUNTERS POINT
SSIC NO. 5090.3

Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov>
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 • FAX (510) 622-2460

Gray Davis
Governor

March 22, 1999
File No. 2169.6032

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402
Attention: Mr. Richard Powell

Re: Regional Water Quality Control Board, San Francisco Bay Region Comments on the Navy's Responses to Comments on the Draft Parcel F Feasibility Study Report, Hunters Point Shipyard (dated January 11, 1999)

Dear Mr. Powell:

Thank you for the opportunity to review the above-referenced document. Comments from the Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) are presented as an attachment to this letter. Many of the responses note that changes to the FS will be made in accordance with the RWQCB's original comments. Concurrence with the Navy's response will be contingent on review of the Draft Final FS incorporating the responses.

If you have any questions regarding this letter, please call me at 510-622-2377.

Sincerely,

David F. Leland, P.E.
Groundwater Protection and Waste
Containment Division

C:\HuntersPoint\ffsrctcl.ma9

Attachment

cc: Mr. Chein Kao, DTSC
Ms. Sheryl Lauth, USEPA
Mr. James Polisini, DTSC

California Environmental Protection Agency

**Regional Water Quality Control Board, San Francisco Bay Region,
Comments on the Navy's Responses to Comments on the Draft Parcel F
Feasibility Study Report, Hunters Point Shipyard (dated January 11, 1999)**

GENERAL COMMENTS

1. The responses note in several locations that a single value of 420 ug/kg DDT is used in both the low-volume and high-volume scenarios. Given the availability of both San Francisco Bay ambient and ER-M values for DDT, the RWQCB feels that these values should be used for the high-volume and low-volume scenarios, as is done for other chemicals of interest for which these values are available.
2. There continues to be discussion and lack of resolution on the screening criteria and their application. RWQCB staff suggest a working meeting or a series of working meetings to address these issues as a key step in coming to closure on those sediments considered to represent the low-volume and high-volume scenarios. The revised flow diagrams and the station-by-station tabular summaries noted in the response to Clarence Callahan's Attachment 2 discussion should be available prior to these meetings to facilitate the process.
3. Response to General Comment 1. The USGS presented a paper at the 1996 "State of the Estuary" conference that addressed the issue of resuspension of sediment in the Bay. The reference is Jaffe et al., as presented at the 1996 State of the Estuary conference and summarized in the 1992-1997 State of the Estuary report. The work being done by David Schoellhamer (USGS Sacramento) could also be useful and relevant. These efforts may offer a basis for estimating the magnitude of dredging-related resuspension to naturally occurring resuspension events.
4. Response to General Comment 3. The RWQCB appreciates the Navy's initiative in looking at the contaminated offshore sediments issue on a regional basis. At the same time, the RWQCB does not support deferring progress on the Parcel F FS pending the outcome of a regional evaluation. Progress on completion of the Draft Final Parcel F FS already has been subjected to numerous delays. The RWQCB supports developing the Mare Island upland disposal option on an expedited basis for inclusion in the Draft Final Parcel F FS. The RWQCB does not agree with the Navy's position that the Mare Island ponds will be ruled out based on City of Vallejo reuse plans and as such should not be considered.
5. The revised alternatives to be presented in the Draft Final FS should include a full analysis of the use of Parcel F sediments as foundation material in the

IR 1/21 debris zone. This process option passed the initial and secondary screening steps but does not appear to have been carried further in the development and analysis of alternatives. The analysis should include a comparison of the relative costs of using Parcel F sediments vs onshore soils (e.g., Parcel E soils) as foundation material at IR 1/21.

6. Response to General Comment 8. What are the Navy's plans to refine the estimates of waste volumes with respect to TTLC, TCLP or STLC analyses?

SPECIFIC COMMENTS

Response to Specific Comment 39. After further consideration and review, the RWQCB does not feel that the use of wetland cover and non-cover values in establishing offshore sediment cleanup levels is appropriate. The data screening process would be both simpler and more transparent if the wetland cover and non-cover steps were eliminated. It may be possible to incorporate an assessment of cover depth and accretional patterns as part of the data screening, as suggested in the original comment. For example, consideration of some measure of current depth of cover (e.g., 3 feet) with evidence of accretion could be used as a screen.