



Department of Toxic Substances Control

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HUNTERS POINT
SSIC NO. 5090.3



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

March 22, 2000

Commanding Officer
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
San Diego, Ca 92132-5190
Attention: Ms. Marie A. Avery

NAVY'S PROPOSAL FOR CONTINUING REMEDIATION AT PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Dear Ms. Avery:

The Department has reviewed the Navy's proposed approach, dated March 10, 2000, for continuing the cleanup action at Parcel B. The proposal was received on March 13, 2000 and, as promised, we are providing expedited comments within ten days so that the Navy can go out and restart the cleanup action at Parcel B. The proposal also included two enclosures: Enclosure 1) Soil Cleanup Standards and enclosure 2) Summary of Excavation Status. Our comments are limited to address the proposed approach itself and do not address the accuracy of these two enclosures.

We are pleased that the proposal provided ample opportunities for regulatory agencies to review and concur at many decision points. However, we do have following comments for you to consider:

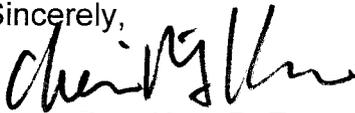
1. During the Phase I in-situ confirmation sampling, all Chemical of Concern (COC) should be sampled and analyzed for. It is not clear how the depth of each phase I confirmation sample is determined.
2. Small exceedance/Large exceedance should be clearly defined. We suggest that five (5) percent to be a reasonable cut-off point for small/large exceedances.
3. Under scenario 2, please define what is the sample population that will be used to calculate each "concentration term".
4. Under Scenario 3, when a composite confirmation sidewall soil sample exceeds updated ROD goals, how is the location of the composite sample determined?

And what is the justification for the proposed excavation(step out) boundary as shown in the figure?

5. The above comment applies to scenario 4, 5, and 6 as well, except where discrete samples were collected, we agree the step-out excavation can be located around the discrete sample. But confirmation samples should be collected from the newly created sidewalls.
6. The proposed approach does not address the vertical extent of contaminations during Phase I confirmation sampling.
7. The approach does not address the sites that have not been previously excavated.

If you have any questions, please contact me at (510) 540-3822.

Sincerely,



Chein Ping Kao, P. E.
Senior Hazardous Substance Engineer
Office of Military Facilities

cc: Ms. Claire Trombadore
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