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HUNTERS POINT  
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WBB-65622

March 24, 2000

Commanding Officer  
Naval Facilities Engineering Command  
Department of the Navy Southwest Division  
1220 Pacific Highway  
San Diego, California 92132-5190  
Attn: Richard Mack

Re: Draft Parcel C Risk Management Technical Memorandum - Hunters Point Shipyard

Dear Mr. Mack:

At your request, enclosed are Lennar/BVHP Partners' technical comments on the Parcel C draft Risk Management Technical Memorandum dated November 15, 1999. The preliminary recommendations presented in the enclosed comments are based on the weekly meetings of the Risk Management Review (RMR) Team which included representatives from U.S. EPA, DTSC, Tetra TECH EMI, Navy, City and County of San Francisco Health Department, Levine-Fricke, and Dames & Moore. Since the introductory sections were not provided in this submittal, the majority of the comments provided are related to the specific remediation areas or de minimis areas that were reviewed. The comments have been segregated into two categories dealing with General Comments (GC) that encompass issues related to the approach for all areas while Specific Comments (SC) were provided for individual areas. Overall, the individual site write-ups followed the format approved by the RMR team and accurately present recommendations that were recorded in the meetings except for specific cases described in the SC Section.

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Commanding Officer

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Please feel free to give me a call with any questions at (415) 774-2946.

Very truly yours,

A handwritten signature in cursive script that reads "Betsy McDaniel". The signature is written in dark ink and is positioned above the typed name.

M. Elizabeth McDaniel

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Enclosures

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cc: Mr. William Radzevich, Code 6229

Elaine Warren, Esq.

Rona Sandler, Esq.

Ms. Amy Brownell

Mr. Jessie Blout

Mr. Roy Willis

## General Comments:

- GC 1. Justification for remediating areas slated for mixed use to industrial standards needs to be provided since the Navy originally agreed to cleanup areas following the land use proposed in the San Francisco Redevelopment Agency's Redevelopment Plans dated July 14, 1997. The Draft Report's recommendations would result in land-use restrictions, which may not be acceptable to the developer or which may result in significantly higher development and management costs over time. This is inconsistent with the Navy's obligation to clean up the shipyard to facilitate redevelopment and reuse in cooperation with the local reuse authority, the San Francisco Redevelopment Agency and in accordance with the approved Redevelopment Plan for the Hunters Point Shipyard.
- GC 2. The introductory sections should provide rationale for the Navy's adoption of a 5 feet remediation depth, which differs significantly from the agreed upon depth of 10 feet suggested by US EPA and DTSC and is inconsistent with the methodology followed in the previous Parcel D RMR process.
- GC 3. For each of the site areas, the general comment of "based on a review of the data, the area is adequately characterized" presented in the Operational History and Site Characterization Section and Site Characterization should be deleted. In general, the RMR team found that biased sampling was performed for areas suspected of contamination; however, this differs significantly from stating that a site has been characterized. For a majority of the trench and pit samples, only a single sample was collected. Other areas, additional sampling has been recommended by the RMR team.
- GC 4. The introductory section should provide some clarification as to how the size of the remediation areas were defined in the Remedial Investigation (RI). It is our understanding that many of these areas will be refined based on the result of the RMR process such that in some cases, the areas designated for remediation have been combined, new areas have been identified for evaluation, and the limit of excavation will be based on the results of the confirmation sampling.
- GC 5. For all site areas, the associated risks presented in the summary table of the Data Evaluation and Risk Assessment Section needs further clarification. Are the risks presented taken from either the RI, calculated based on the maximum measured concentration or exposure point concentration for each chemical by grid cell, or estimated for each remedial area/ de minimis area by chemical? In addition, chemical drivers for the hazard index should be provided, as appropriate.
- GC 6. For areas designated for mixed use and research and development, risk drivers and associated risks and hazards under the residential land use scenario should be provided for comparison purposes in order to evaluate the worst-case conditions likely to remain at the site once the Navy has completed the industrial remediation. This is particularly important in cases where lead exceedances above the residential cleanup level of 169 mg/kg are noted in the surface soils. Also, clarification of the cleanup criteria for lead based on residential land use need to be provided since the RMR team used a value of 230 mg/kg based on exposure through ingestion of homegrown produce and the worksheets list 169 mg/kg as the lead cleanup level.
- GC 7. The text states that the 1998 industrial PRG for aroclor is 1.3 mg/kg and that the EPA recommended cleanup level is 10 mg/kg. It should be further clarified that the 1.3 mg/kg is used by DTSC as the cleanup level for total PCBs in industrial soil and was applied to individual PCBs. The industrial cleanup level of 10 ppm is used by US EPA for total PCBs.

Please provide clarification as to the cleanup level used by both agencies for areas designated for mixed use on Parcel C.

- GC 8. Please provide justification as to why concentrations of chemicals such as benzo(a)pyrene and other polychlorinated aromatic hydrocarbons (PAHs) are associated with asphalt even at depths of up to 2 feet below ground surface (bgs). The general assumption that PAH at the site are related to asphalt is inaccurate without any consideration of the depth of the sample and the chemical concentration detected. A statistical analysis is required to determine ambient levels of chemicals found in asphalt to generate conclusive evidence (and also provide a baseline concentration) that the presence of certain PAHs at the site are the result of paving rather than site-related contamination.
- GC 9. For all site areas, conclusion that the “chemicals driving risk in soils are relatively immobile and are not considered a potential source of groundwater contamination” in the Groundwater Issues Section is misleading and should be deleted. In many cases, the groundwater is already impacted from soil contamination leaching into groundwater as can be seen in the contamination found in RU-1 through RU-6. In addition, the chemicals being detected in soil are generally volatile and/or water soluble and thus, are not likely to persist in groundwater. However, this does not imply that the chemicals found in soil have not or are not potentially impacting the groundwater quality.
- GC 10. The conclusion table should state that a “consensus” was not reached rather than a “conclusion” was not reached. In addition, it should be clearly stated that the purpose of the RMR meeting was to provide “recommendations” and not “conclusions” for each site area.
- GC 11. Under the Protectiveness Section of the worksheets, it asks the question if site-specific conditions exist which mitigate the exposure or risk associated with the driver chemicals. The general response found in a majority of the worksheet has been that the current presence of surface features (i.e., asphalt or concrete covering) on the area may prevent contact with the contamination. However, this does not account for the necessary excavation and other construction activities that will inevitably be required to redevelop this Parcel as contemplated by the Redevelopment Plan and as evidenced by Lennar's Preliminary Design Concept. The construction workers employed during the development of the sites may be exposed to the deeper contamination once the surface feature is removed. In these areas, potential risks to construction workers should be addressed in compliance with the Redevelopment Plan. Additional discussion in the report of how risks to construction workers are being evaluated and whether this approach of estimating exposures to industrial workers and residents are health-protective of acute exposures to construction workers.
- GC 12. In discussions with the RMR team, it was indicated that there is no ecological risk due to the extensive presence of asphalt on the site, but asphalt cover may be removed in future development. This eventuality should be addressed. In addition, are institutional controls required on the site to ensure that the areas in Parcel C are not attractive to wildlife. Migration of soil leachate to the Bay needs to be addressed into the report once the Groundwater Technical Memorandum becomes available.
- GC 13. The report points out the occurrence of groundwater contamination, but does not address it. Further information needs to be provided in the report as to how the results from the Groundwater Technical Memorandum will be integrated with the soil conclusions. In addition,

the report does not address the presence of contamination in soil below the water and below 10 feet bgs, which, if not remediated, would be a continuing source to groundwater.

- GC 14. The wording on the worksheets in the Fill Material, Ambient Conditions, and Revised Screening Criteria Section is incorrect. It should note when chemical concentrations (i.e., beryllium and PCBs) are above the screening criteria rather than when the levels are below the criteria.
- GC 15. In the worksheets, the Action Required Section should be renamed to Recommendations Section. The selection of both CERCLA remedial action and no CERCLA action based on the agency recommendation is confusing. An easier format may be to identify each agency recommendation so that the notes section is eliminated. Also, the option to implement institutional controls in addition to land-use restrictions should be deleted as an action since it was not selected in any of the areas evaluated and would restrict redevelopment plans already proposed by the San Francisco Redevelopment Agency.
- GC 16. Please clarify who are the members of the Base Realignment and Closure Act of 1990 (BRAC) Cleanup Team (BCT). Does this team include the City and County of San Francisco? Also, recommendations by the RMR Team needs to be referred to in a consistent manner either as BCT or individual named agencies.
- GC 17. The action required as listed in the worksheets require that land use restrictions be applied in all cases regardless if CERCLA remedial action is implemented. For cases in which unrestricted land use is recommended (i.e., residential), does the land use restrictions still apply or are they being applied at depths of 10 feet and greater? These restrictions are likely to hinder redevelopment plans already proposed by the San Francisco Redevelopment Agency.
- GC 18. The Soil Summary Table showing 100% of the chemicals contributing risks does not contain information for IR 25. The data from the Feasibility Study are already summarized in the individual site descriptions and thus, provide redundant information that may be eliminated from this submittal.
- GC 19. Chemicals concentrations presented in the risk driver tables should be consistent with those being posted in the spider maps.

**Specific Comments:**

- SC 1. **Site IR-25, RA 25-1:** (A) Two samples (IR25B013 @ 1.25' and PA46TA11 @ 2.25') had maximum detected concentrations of 2 mg/kg for aroclor 1260. Both depths should be presented in the risk driver table. (B) Lead exceedance of 240 mg/kg at PA46TA11 above the residential cleanup criteria should be noted in the Data Evaluation Section. (C) It states in the Risk Management Factors Section that soil at PA46TA11 was excavated as part of the remedial action for Parcel B, please provide results of the confirmation sampling collected as part of the excavation and whether clean fill was used to backfill the excavation. (D) Chemicals driving groundwater risk include PCBs and TPH, not just volatile organic compounds as noted in the text. (E) It should be noted that the Navy recommendation of No Further Action (NFA) is based on industrial land use. (F) EPA, DTSC, and the City recommended remediation of the soil because the majority of the detected chemicals exceed

residential Preliminary Remediation Goals (PRGs) and risk levels. The statement that the area be excavated as part of a source removal for groundwater at RU-6 should be deleted. This implies that the soil is the source of the groundwater contamination which contradicts the previous statement in the Groundwater Issues Section which states that the soil is not a potential source of the groundwater contamination. (G) In the worksheet, it states that the detection of Aroclor 1260 at PA46TA11 corresponds with the location of the fuel lines. Are the fuel lines located at 2 feet bgs and is this also the case for the aroclor detection at boring IR25B015?

- SC 2. **Site IR-25, RA 25-2:** (A) It should be noted that the Navy recommendation of NFA is based on industrial land use. (B) EPA, DTSC, and the City recommended remediation of the soil because the majority of the detected chemicals exceed residential PRGs and risk levels. The statement that the area be excavated as part of a source removal for groundwater at RU-6 should be deleted. This implies that the soil is the source of the groundwater contamination which contradicts the previous statement in the Groundwater Issues Section which states that the soil is not a potential source of the groundwater contamination. (C) It should be noted that trichloroethene was detected at 86 ug/L in groundwater at wells beneath this remediation area.
- SC 3. **Site IR-25, RA 25-3:** (A) Please clarify the statement that the “chemical driving risk was not detected in groundwater beneath this remedial area” since trichloroethene was detected in groundwater at IR25MW16A at 86 ug/L and is also the risk driver in soil.
- SC 4. **Site IR-25, RA 25-4:** Please provide worksheets and write-ups for this remediation area.
- SC 5. **Site IR-25, DM B3822:** (A) Please provide depth and confirmation sampling results when they become available for the Parcel B remedial action that removed the fuel lines and soil adjacent to test pit PA46TA10. (B) Verification that the test pit soil was removed needs to be provided in order to recommend a NFA for this site since the aroclor concentration exceeds the criteria for DTSC.
- SC 6. **Site IR-25, DM B3924:** (A) 1,2-Dichloroethane is listed as the chemical driver under the residential scenario; however, it is the driving chemical for industrial exposures while aroclor 1260 is the risk driver for residential exposures. (B) Tetrachloroethane, trichloroethene, and vinyl chloride should be included as chemicals detected in groundwater since they were measured in boring IR25B012 which underlies the site. (C) The sentence that “no chemicals driving risk are present at de minimis area B3924 under an industrial reuse scenario” is misleading since the chemicals were detected; however, the chemical concentrations are below the industrial PRGs and thus are unlikely to have a significant health impact. Please change the wording of this sentence. (D) In addition since exposures to indoor air were not evaluated as part of the development of PRGs and in some cases, volatile organic chemicals were detected, the assumption that a site has “no risk” is inaccurate. The text needs to address risks associated with this pathway for sites in which tenants and workers will spend a majority of their time indoors. (E) Since the Navy is only remediating up to 5 feet bgs, please verify that the sample IR25B012 collected at this site are representative of the top 5 feet of contamination. (F) Please provide residential risk and hazard estimated for this de minimis area.
- SC 7. **Site IR-25, DM B3926:** (A) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk were not detected in groundwater beneath this de minimis area”. From the site maps, it appears that there are no wells located near this de

minimis area. (B) The manganese exceedance listed in the Risk Management Factors is above the 1998 residential PRG and not the industrial standard. (C) Please provide justification for assuming that the manganese concentration found in soil is associated with chert. Ambient concentration study correlating manganese concentration to the presence of chert needs to be performed prior to making that general statement. (D) For the recommendations, DTSC suggested that the Navy review the data to determine if there is a correlation between the manganese concentration and chert. (E) Also, all agency representatives recommended that the Navy investigate the occurrence of hexavalent chromium (number of samples and if all the samples were nondetect) at this site. If the Navy can show that there is a correlation between manganese and chert and that the hexavalent chromium concentrations are below the screening criteria, then a NFA will be recommended. (F) Please provide residential risk and hazard estimated for this de minimis area.

- SC 8. **Site IR-25, DM B4126:** (A) Please provide residential risk and hazard estimated for this de minimis area. (B) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk were not detected in groundwater beneath this de minimis area”. From the site maps, it appears that there are no wells located near this de minimis area. (C) The sentence that “no chemicals driving risk are present at de minimis area B3924 under an industrial reuse scenario” is misleading since the chemicals were detected; however, the chemical concentrations are below the industrial PRGs and thus are unlikely to have a significant health impact. Please change the wording of this sentence.
- SC 9. **Site IR-27, DM 9307:** (A) The operational history should state that the de minimis area is a former product line trench. (B) The City recommends the area be zoned for educational and cultural and not cultural and institutional. (C) It should be noted that benzo(a)pyrene concentration was detected above residential screening criteria. (D) There is a typographical error in the first sentence of the Risk Management Factors where it should state “fuel leak” instead of fuel lead. (E) Please provide evidence that the benzo(a)pyrene concentration at 2.25 feet is associated with asphalt.
- SC 10. **Site IR-28, RA 28-1:** (A) The statement that no lead concentration was detected above 1000 mg/kg should be changed since the risk driver table clearly shows that lead was detected at 1800 mg/kg at 6.25 feet. (B) Please clarify the criteria that is used to identify chemicals as risk drivers since risks and hazards are not estimated for lead and cleanup criteria for lead are based on acceptable blood-lead levels in adults and children. (C) Benzo(k)fluoranthene should be eliminated as a chemical driving risk since its maximum measured concentration of 4 mg/kg is below the industrial PRG of 36 mg/kg. (D) Besides copper, mercury, and zinc, additional chemicals detected in groundwater include selenium (IR28MW124A), trichloroethene (IR28B266), cis 1,2-dichloroethene (IR28B101) and vinyl chloride (IR28B101). Please clarify why these chemicals were not added to the list of detected constituents in groundwater. (E) The elevated concentrations of arsenic, benzo(a)pyrene, and dibenzo(a,h)anthracene at boring IR28B101 were not recommended for remediation since the depths at which these samples were collected exceeded the Navy’s planned remediation depth. Please provide justification that the soil above 5 feet is well characterized such that no remediation is recommended since the sample depths are at 1.75 feet and 6.25 feet. If the chemical concentrations posted are the result of compositing between these depths, then the measured concentration should be representative and applied throughout that sample depth range. In that case, the chemical concentration indicated for 6.25 feet would be applicable for the soil column between 1.75 feet and 6.25 feet which would be within the Navy’s planned remediation area. (F) Similar to

comment E, no surface data was collected from 0 to 5.25' at boring IR28B131. Please provide justification that the soil above 5 feet is well characterized such that no remediation is recommended. (G) The conclusions should include the City as recommending remedial action on the northern and eastern sides of Building 231. Please include the samples recommended for remediation. They are IR28B131, IR28B101, IR28B102, and PA28B023. Delete the City's recommendations of remedial action for the entire existing remedial area 28-1. For consistency, if chemicals are being identified for remediation by the Navy, they should likewise be stated in the recommendations presented for the EPA, DTSC, and City. (H) The assertion that the driver chemicals were detected beneath a concrete building floor would mitigate exposure is correct if the foundation is intact and will remain in place during development. However, volatile organic compounds detected in groundwater may still migrate through the foundation and effect indoor air. Please address exposure through this pathway and as recommended by the RMR team, a drawing showing the building foundation at Building 231 should be provided in the submittal.

SC 11. **Site IR-28, RA 28-2:** (A) Please verify the associated risk listed for aroclor 1260. Using the maximum measured concentration of 270 mg/kg, the risk would be approximately  $2 \times 10^{-4}$ . In order to have a risk of  $10^{-6}$  as presented in the table, the exposure point concentration has to be two orders of magnitude below the maximum detected concentration. (B) Similar to Comment A, please verify the associated risk for arsenic. Ratioing the maximum measured concentration to the industrial PRG results in an estimated risk of  $8 \times 10^{-5}$ . (C) Besides aroclor 1260 and vinyl chloride, additional chemicals detected in groundwater at IR58MW31A, IR28B279, and IR28B282 include benzene, tetrachloroethane, 1,1,2,2-tetrachloroethane, cis-1,2-dichloroethene, 1,4-dichlorobenzene, and 1,2-dichlorobenzene. Please clarify why these chemicals were not added to the list of detected constituents in groundwater. (D) There is a typographical error in the recommendation by the Navy. The sample to be remediated should be IR28B280 and not IR28B208. (E) In the worksheet, it states that the benzo(a)pyrene concentration may be associated with the presence of asphalt; however, benzo(a)pyrene was detected at various depth ranging from 0.75 feet to 10.75 feet. This statement needs to be further justified. (F) Please note that the groundwater has already been impacted and should be included in the response to the question of whether the driver chemicals have the potential to contaminate groundwater in the worksheet. (G) Please identify whether institutional controls or industrial land use would mitigate risks at this area in the worksheet. Due to the elevated concentrations of chemicals present, industrial land use of the site would still present unacceptable risks to workers.

SC 12. **Site IR-28, RA 28-3:** (A) The elevated concentration of benzo(a)pyrene at monitoring well IR28MW311A was not recommended for remediation since the depth at which this sample was collected exceeded the Navy's planned remediation depth. Please provide justification that the soil above 5 feet is well characterized such that no remediation is recommended since the sample depths are at 0.75 feet and 5.25 feet. If the chemical concentrations posted are the result of compositing between these depths, then the measured concentration should be representative and applied throughout that sample depth range and thus, the measured concentration would be within the Navy's planned remediation depth. (B) In boring IR28B209, trichloroethene was detected at 36 ug/L while in monitoring well IR28MW311A, benzo(a)pyrene, heptachlor epoxide, and trichloroethene were measured at 3 ug/L, 0.028 ug/L, and 53 ug/L, respectively. Since several of these compounds correspond to constituents found in soil, please provide justification that the soil is not a source of the groundwater contamination. In addition, please explain why these chemicals were not listed as detected

constituents in groundwater. (C) In the worksheet, it states that arsenic is within two times the HPAL, but this is not the case since the measured concentration is 30.1 mg/kg and the 2 times the HPAL is 22 mg/kg. Please rephrase the sentence to be consistent.

- SC 13. **Site IR-28, RA 28-4:** (A) Please verify the associated risk listed for benzo(a)pyrene. Using the maximum measured concentration of 0.2 mg/kg, the risk would be approximately  $6 \times 10^{-7}$ . In order to have a risk of  $2 \times 10^{-6}$  as presented in the risk table, the exposure point concentration would be three times higher than the maximum measured concentration at this site. (B) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of groundwater contamination.” From the site maps, it appears that there are no wells located near this remediation area. (C) Please identify where and at what quantity the arsenic was detected in groundwater and found to be below the HGAL. (D) Please add in the text that the benzo(a)pyrene concentration presented in the Risk Management Factors section is below the industrial soil PRG. (E) The recommendation for no CERCLA action is applicable to only the BCT. For the City, the recommendation was to remediate due to lead exceedance at 337 mg/kg at monitoring well IR28MW299B based on future residential land use. (F) Please identify whether institutional controls or industrial land use would mitigate risks at this area in the worksheet.
- SC 14. **Site IR-28, RA 28-5:** (A) Please identify where and at what quantity the arsenic was detected in groundwater and found to be below the HGAL. (B) Please add in the text that the benzo(a)pyrene concentration presented in the Risk Management Factors section is below the industrial soil PRG. (C) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this remediation area. (D) The recommendation for no CERCLA action is applicable to only the BCT for any land use and thus, “industrial reuse scenario” should be deleted. For the City, the recommendation was that no remedial action was required to meet future residential land use.
- SC 15. **Site IR-28, RA 28-6:** (A) Please add to the description of the operational history at the site that trash was dumped in the vicinity of IR28B178 at depths greater than 12 feet bgs. (B) Please explain why arsenic was not included in the risk drivers table. Arsenic was detected at 11.7 mg/kg at 6.75 feet. (C) Please clarify why the lower concentration for beryllium of 0.72 mg/kg at 6.25 feet was presented in the risk driver table when a higher value was detected at 95 mg/kg at 7.75 feet. (D) Please add in the text that all the chemical concentrations are below the industrial soil PRG. (E) The list of chemicals driving risk should include arsenic and the borings IR28B180 and IR28B178. (F) Please provide explanation for the presence of asphalt inside the building in which the benzo(a)pyrene concentration was detected. From the site visit, the building foundation consisted of wood blocks and concrete. (G) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of groundwater contamination” since the groundwater has already been impacted. Carbon tetrachloride and trichloroethene were detected in groundwater and they should be noted in the response to the question of whether the driver chemicals have the potential to contaminate groundwater in the worksheet. (H) TRPH was detected at 7400 mg/kg in boring IR28B180 at 6.75 feet. This should be presented in the worksheet.
- SC 16. **Site IR-28, RA 28-7:** (A) Please verify the associated risk listed for benzo(a)pyrene. Using the maximum measured concentration of 0.1 mg/kg, the risk would be approximately  $3 \times 10^{-7}$ . In order to have a risk of  $1 \times 10^{-6}$  as presented in the risk table, the exposure point

concentration would be three times higher than the maximum measured concentration at this site. (B) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of groundwater contamination” since the groundwater has already been impacted. Trichloroethene were detected in groundwater and should be noted in the response to the question of whether the driver chemicals have the potential to contaminate groundwater in the worksheet.

- SC 17. **Site IR-28, RA 28-8:** In monitoring well IR28MW211F, trichloroethene, carbon tetrachloride, chloroform, and 1,1,2-trichloroethane were detected at 40,000 ug/L, 38 ug/L, 260 ug/L, and 39 ug/L, respectively. Please provide justification that the soil did not impact the groundwater quality and explain why these chemicals were not listed as detected constituents in groundwater.
- SC 18. **Site IR-28, RA 28-9:** (A) Arsenic, vinyl chloride, and trichloroethene were detected in the monitoring event in 1993. Since some of these compounds correspond to constituents found in soil, please provide justification that the soil is not a source of the groundwater contamination. In addition, please explain why these chemicals were not listed as detected constituents in groundwater. (B) The elevated concentration of arsenic at monitoring well PA28MW52A was not recommended for remediation since the depth at which this sample was collected exceeded the Navy’s planned remediation depth. Please provide justification that the soil above 5 feet is well characterized such that no remediation is recommended since the sample depths are at 2.75 feet and 6.75 feet. If the chemical concentrations posted are the result of compositing between these depths, then the measured concentration should be representative and applied throughout that sample depth range and thus, the measured concentration would be within the Navy’s planned remediation depth. (C) DTSC reserves judgement on this remediation area and has yet not recommended remediation as noted in the conclusions.
- SC 19. **Site IR-28, RA 28-10:** (A) The elevated concentration of arsenic was not recommended for remediation since the depth at which this sample was collected exceeded the Navy’s planned remediation depth. Please provide justification that the soil above 5 feet is well characterized such that no remediation is recommended since the sample depths are at 0.25 feet and 6.25 feet. If the chemical concentrations posted are the result of compositing between these depths, then the measured concentration should be representative and applied throughout that sample depth range and thus, the measured concentration would be within the Navy’s planned remediation depth. (B) It was noted in the text that the benzo(a)pyrene concentration was associated with asphalt. Please verify whether the transformer pad is covered with concrete or asphalt.
- SC 20. **Site IR-28, RA 28-11:** (A) In the beginning paragraph, the City is proposing educational and cultural land use which would meet industrial standards and not residential standards. (B) Please verify the risks presented in the risk driver table for aroclor 1260, benzo(k)fluoranthene, indeno(1,2,3-cd)pyrene, and vinyl chloride. Based on the maximum measured concentration presented, the risks from these chemicals should be below  $10^{-7}$  rather than  $10^{-6}$  as presented in the table. (C) In the Risk Management Factors, only EPA and the Navy agreed that the arsenic concentration of 30 mg/kg was within the range of ambient variability. DTSC and the City recommended remediation of this boring due to the arsenic level detected. (D) The elevated concentrations of PAHs at boring IR28B135 were not recommended for remediation since the depth at which this sample was collected exceeded the Navy’s planned remediation depth. Please provide justification that the soil above 5 feet is well characterized such that no

remediation is recommended since the sample depths are at the surface and 6.25 feet. If the chemical concentrations posted are the result of compositing between these depths, then the measured concentration should be representative and applied throughout that sample depth range and thus, the measured concentration would be within the Navy's planned remediation depth. (E) Please note that the groundwater has already been impacted with trichloroethene, tetrachloroethane, cis-1,2-dichloroethene, vinyl chloride, and benzene and should be included in the response to the question of whether the driver chemicals have the potential to contaminate groundwater in the worksheet. (F) Please provide the UST removal report and confirmation sampling results for the UST that was removed in 1993. (G) In the conclusion, DTSC and the City recommend remediation due to the arsenic and benzo(a)pyrene exceedances and not further evaluation as stated in the text. This should be changed.

- SC 21. **Site IR-28, RA 28-12:** (A) In the beginning paragraph, the City is proposing educational and cultural land use which would meet industrial standards and is not proposing open space. (B) In boring IR49B025, antimony, barium, and thallium were detected at 7 ug/L, 1336 ug/L, and 3.5 ug/L, respectively. In other borings, both cis-1,2-dichloroethene and vinyl chloride were detected. Please provide justification that the soil did not impact the groundwater quality and explain why these chemicals were not listed as detected constituents in groundwater. (C) In the Risk Management Factors, benzo(a)pyrene was detected at boring PA49TA09 and not PA49TA05. (D) Please provide justification for the assumption that the benzo(a)pyrene concentration detected at 4.25 feet bgs is associated with asphalt. (E) Please clarify why a higher detected TRPH concentration of 5800 mg/kg at boring IR49B026 at 4.25 feet was not posted in the text. (F) From the RMR meeting, it was agreed that the groundwater found at this site would be included in an RU due to the elevated vinyl chloride detected at 221 ug/L. Please include this in the text or provide explanation as to the source of the elevated vinyl chloride concentration.
- SC 22. **Site IR-28, RA 28-13:** (A) Please explain why a risk driver table was not provided for this remediation area. Both benzo(a)pyrene and dichlorobenzene was detected at levels above the residential PRGs at monitoring well IR28MW298A. (B) Please add in the text that all the chemical concentrations are below the industrial soil PRG, but maximum detected concentration for benzo(a)pyrene was above the residential PRG. (C) Please note that the groundwater has already been impacted with trichloroethene and this should be included in response to the question of whether the driver chemicals have the potential to contaminate groundwater in the worksheet. (D) In the conclusions, it should be added that the City is recommending additional characterization for future residential land use.
- SC 23. **Site IR-28, RA 28-14:** (A) In the first paragraph, please delete the statement that the open space area includes educational and cultural areas. (B) In the RMR meeting, it was discussed that the exploratory excavation EE08 removed soil from borings IR28B240 and IR28B242. Please verify that this is the case since the text only mentions remediation around IR28B240. Confirmation sampling performed after excavation should be provided as part of the submittal.
- SC 24. **Site IR-28, RA 28-15:** (A) Please verify the risks estimated for aroclor 1260 in the risk driver table. Using the maximum measured concentration, the risk estimated for aroclor 1260 based on exposure through direct contact by workers is  $2 \times 10^{-7}$  instead of  $1 \times 10^{-6}$  as presented in the text. (B) Please provide supporting evidence in which to base the conclusion that "chemicals driving risk are not considered a source of the groundwater contamination area". From the site maps, it appears that there are no wells located near this remediation area.

- SC 25. **Site IR-28, RA 28-16:** (A) In the first paragraph, the City recommends the area be zoned for educational and cultural and not cultural and institutional. (B) It states in the Data Evaluation and Risk Assessment Section that the “chemicals driving risk were detected at concentrations above the screening criteria...” However, both chemicals were detected below the industrial soil PRGs and thus, this sentence needs to be revised. (B) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. At IR28MW330A, tetrachloroethane, trichloroethene, cis-1,2-dichloroethene, and vinyl chloride were detected at 23 ug/L, 8 ug/L, 190 ug/L, and 92 ug/L, respectively. Please explain why these chemicals were not identified as chemicals detected in groundwater.
- SC 26 **Site IR-28, RA 28-17:** Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this remediation area.
- SC 27. **Site IR-28, RA 28-18:** (A) In the first paragraph, the City recommends the area be zoned for research and development and not cultural and institutional. (B) The posted concentration of lead was 1620 mg/kg on the map while the text reports a concentration of 1600 mg/kg. Please be consistent with concentrations presented in the maps and text. (C) The elevated concentrations of arsenic and lead at monitoring well IR28MW309B were not recommended for remediation since the depth at which this sample was collected exceeded the Navy’s planned remediation depth. Please provide justification that the soil above 5 feet is well characterized such that no remediation is recommended since the sample depths are at 2 feet and 6 feet. If the chemical concentrations posted are the result of compositing between these depths, then the measured concentration should be representative and applied throughout that sample depth range and thus, the measured concentration would be within the Navy’s planned remediation depth. (D) In the conclusion, EPA, DTSC, and the City recommended that the proposed remediation around IR28MW309B be identified as a de minimis area. Please add this to the text. (E) Please explain the inconsistency in the worksheet where it states that further evaluation is required, but the Navy recommends no CERCLA action.
- SC 28. **Site IR-28, RA 28-19:** (A) In the first paragraph, the City recommends that the area be zoned for educational and cultural reuse and not for educational and cultural area. (B) The posted concentration of lead was 1150 mg/kg on the map while the text reports a concentration of 1200 mg/kg. Please be consistent with concentrations presented in the maps and text. (C) Similarly, the TRPH concentration on the map is 1300 mg/kg while the value in the text is 1340 mg/kg. Please be consistent within the maps and text. (D) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this remediation area. (E) In the RMR meeting, it was noted that the sample was collected during well installation. This should be noted in the text and removed as a criteria for basis of their recommendation by the City and DTSC. (F) The worksheet states that the driver chemicals were detected at 9.75 feet bgs under a sound concrete building floor. Please provide a drawing to show the cross section of the floor.
- SC 29. **Site IR-28, RA 28-21:** (A) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this

remediation area. (B) In the conclusion, DTSC and City recommend no CERCLA action if the boundary of the research and development areas were moved such that this remediation area would remain in the industrial land use area. (C) City and DTSC also recommended that the hexavalent chromium concentration of 2.8 mg/kg be verified to determine whether hexavalent chromium was measured or it was extrapolated from a total chromium measurement.

- SC 30. **Site IR-28, DM 8334:** Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this remediation area.
- SC 31. **Site IR-28, DM 9336:** (A) Manganese was detected at 12,200 mg/kg at 5.75 feet and 16,200 mg/kg at 11.75 feet. Please explain why these concentrations and the associated hazard index were not presented in the risk driver table. (B) Because residential reuse risk assessment results are presented for this de minimis area, the lead criteria should be 169 mg/kg rather than 1000 mg/kg. (C) Carbon tetrachloride and trichloroethene were detected in boring IR28B210 and monitoring well IR28MW312F. Please explain why these chemicals were not identified as chemicals detected in groundwater. (D) Please provide further information for the elevated level of manganese in this area. A correlation is needed if it is proposed that the manganese is related to chert to prove that the manganese concentration is consistent with background levels.
- SC 32. **Site IR-28, DM 9420:** (A) Because residential reuse risk assessment results are presented for this de minimis area, the lead criteria should be 169 mg/kg rather than 1000 mg/kg. (B) It was noted in the RMR meeting that a 6 foot thick concrete slab is found at the surface. Thus, arsenic and lead detected at 11.75 feet bgs is within the Navy’s proposed remediation depth if the 5 foot depth is taken at the start of the soil covering. Arsenic was detected at 175 mg/kg while lead was detected at 4640 mg/kg; both of which are elevated above industrial reuse criteria. Please provide clarification as to the Navy’s position on cleaning areas where the covering encompasses the majority of the surface. (C) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. The chemicals detected beyond 10 feet are within the water bearing zone and are consistent with the contamination found in soil. (D) In the conclusions, EPA and Navy recommend no CERCLA remedial action with institutional controls while DTSC and City recommended additional characterization due to the elevated contamination beyond 10 feet bgs.
- SC 33. **Site IR-28, DM 9434:** Please add to the operational history that the de minimis area represent a former sump located in Building 270.
- SC 34. **Site IR-28, DM 9532:** (A) De minimis area 9532 is located near the southeastern corner of Building 270, not the southwestern corner as stated in the text. (B) Please provide confirmation sampling results for exploratory excavation EE-09.
- SC 35. **Site IR-28, DM 9618:** (A) De minimis area 9532 is located in a sump on the concrete floor of Building 231. Since this is an exposed area, please provide further information as to how the concrete floor would mitigate exposure to chemicals detected at the sump. (B) Based on the groundwater data, benzene, phthalate, and thallium were detected. Please provide justification that the soil did not impact the groundwater quality as stated in the text and explain why these chemicals were not listed as detected constituents in groundwater.

- SC 36. **Site IR-28, DM 9621:** (A) The land use for this site is slated for educational and cultural reuse and not cultural and institutional. (B) Please provide further information as to whether this de minimis area is within an RU. (C) TRPH was detected at 1100 mg/kg in boring IR28B111 at 10.75 feet. Please explain why this concentration was not noted in the text.
- SC 37. **Site IR-28, DM 9721:** (A) The land use for this site is slated for educational and cultural reuse and not cultural and institutional. (B) Please provide further information as to whether this de minimis area is within an RU and why chemicals detected in this area were not discussed in the text. Chromium, nickel, and vinyl chloride have been detected in nearby monitoring well IR28MW129A and boring IR28B120.
- SC 38. **Site IR-28, DM 9819:** (A) The land use for this site is slated for educational and cultural reuse and not cultural and institutional. (B) The elevated concentrations of benzo(a)pyrene at boring IR28B121 were not recommended for remediation since the depth at which this sample was collected exceeded the Navy's planned remediation depth. Please provide justification that the soil above 5 feet is well characterized such that no remediation is recommended since the sample depths are at 1.75 feet and 6.75 feet. If the chemical concentrations posted are the result of compositing between these depths, then the measured concentration should be representative and applied throughout that sample depth range and thus, the measured concentration would be within the Navy's planned remediation depth. (C) Please note that this de minimis area is overlying RU-2 where trichloroethene was detected at 240 ug/L. The text should state that the groundwater is already impacted versus that the soil is not considered a source of the groundwater contamination.
- SC 39. **Site IR-28, DM 9824:** (A) The land use for this site is slated for educational and cultural reuse and not cultural and institutional. (B) De minimis area 9824 is located in a sump on the concrete floor of Building 253. Since this is an exposed area, please provide further information as to how the concrete floor would mitigate exposure to chemicals detected at the sump. (C) A typographical error is noted in the Other Information Section. It should state de minimis area 9824 rather than 9921 as presented in the text.
- SC 40. **Site IR-28, DM 9919:** (A) The land use for this site is slated for educational and cultural reuse and not cultural and institutional. (B) Please provide further information as to whether this de minimis area is within RU-2 and why chemicals (i.e., vinyl chloride and trichloroethene) detected in this area were not discussed in the text.
- SC 41. **Site IR-28, DM 9921:** (A) The land use for this site is slated for educational and cultural reuse and not cultural and institutional. (B) Please provide further information as to whether this de minimis area is within RU-2 and why chemicals (i.e., vinyl chloride) detected in this area were not discussed in the text.
- SC 42. **Site IR-28, DM 10112:** (A) The land use for this site borders between open space and educational and cultural reuse. (B) Please explain why chemicals (i.e., benzene, tetrachloroethane, trichloroethene, and vinyl chloride) detected in groundwater were not discussed in the text. The text should state that the groundwater is already impacted versus that the soil is not considered a source of the groundwater contamination.

- SC 43. **Site IR-28, DM 10204:** Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area.
- SC 44. **Site IR-28, DM 10220:** (A) The land use for this site is slated for educational and cultural reuse and not cultural and institutional. (B) Arsenic was detected at 22.3 mg/kg at 11.75 feet. Please explain why this concentration was not posted in the risk driver table. (C) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area.
- SC 45. **Site IR-28, DM 10329:** (A) The aroclor 1260 and benzo(a)pyrene concentration were both detected at the surface (0 feet) rather than 0.5 feet as presented in the text. (B) It should be stated in the text that the chemicals driving risk were detected above residential screening criteria. (C) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located within 100 feet of this trench. (D) Please note that there were no samples collected beyond the surface and thus, the contamination is not vertically bounded as stated in the worksheet.
- SC 46. **Site IR-28, DM 51SS15:** (A) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located within 100 feet of this area (B) The conclusion for remediating de minimis area 51SS15 to a depth of 2 feet is dependent on the confirmation sampling results.
- SC 47. **Site IR-29, RA 29-1:** (A) Chrysene was detected at 13 mg/kg at 5.25 feet. Please explain why this concentration was not presented in the risk driver table. (B) Please explain why a higher lead concentration of 1730 mg/kg found at the surface of boring PA29SS37 was not presented in the risk driver table. (C) The list of borings in which chemicals were detected should also include trench area IR29TA52 and boring IR29B054. (D) In the Risk Management Factors Section, the industrial PRG for aroclor is 1.3 mg/kg and not 0.36 mg/kg. In addition, it should be noted that benzo(a)pyrene was detected above industrial PRGs in trench area IR29TA52 at 9.75 feet. (E) Please explain why benzene which was detected in boring IR29B072 was not identified as a chemical detected in groundwater.
- SC 48. **Site IR-29, RA 29-2:** (A) In the RMR meeting, it was agreed that the contamination found in RA 29-2 is associated with RA 29-4. Consequently, all agencies representatives recommended combining RA29-2 and RA 29-4 and initially remediating RA 29-2 towards RA 29-4. Please change the text to reflect this conclusion. (B) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area. (C) Please provide the associated hazard index for manganese based on residential exposure.
- SC 49. **Site IR-29, RA 29-3:** (A) The aroclor 1254 concentration posted on the map is 1.4 mg/kg while the text present a value of 1 mg/kg. Please be consistent between the table and text. (B) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk

are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area.

- SC 50. **Site IR-29, RA 29-4:** (A) In the RMR meeting, it was agreed that the contamination found in RA 29-2 is associated with RA 29-4. Consequently, all agencies representatives recommended combining RA29-2 and RA 29-4 and initially remediating RA 29-2 towards RA 29-4. Please change the text to reflect this conclusion. (B) Please explain why heptachlor epoxide was not identified as a chemical detected in groundwater. (C) Please provide the associated hazard index for manganese based on residential exposure. (D) The recommendation for no CERCLA action at RA 29-4 on condition that remediation will occur at RA 29-2 should include the City. The recommendation for remediation of manganese in boring IR29B046 should be deleted.
- SC 51. **Site IR-29, RA 29-6:** (A) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area. (B) In the worksheet, it should state that DTSC and City recommend remediation of PAHs.
- SC 52. **Site IR-29, RA 29-7:** The lead concentration posted on the map is 1230 mg/kg while the text present a value of 1200 mg/kg. Please be consistent between the table and text.
- SC 53. **Site IR-30, RA 30-1:** Please provide worksheets and write-ups for this remediation area.
- SC 54. **Site IR-57, RA 57-1:** Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area.
- SC 55. **Site IR-57, DM 8944:** Please verify the associated risk for benzo(a)pyrene as listed in the risk driver table. Using the maximum measured concentration of 0.2 mg/kg, the industrial risk would be  $6 \times 10^{-7}$  based on exposure through direct contact by workers.
- SC 56. **Site IR-57, DM 9654:** Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area.
- SC 57. **Site IR-58, RA 58-1:** (A) Please provide exploratory excavation report for EE11A and confirmation sampling in which to base the conclusion that the contamination at boring PA58SS08 has been removed. (B) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area.
- SC 58. **Site IR-58, RA 58-2:** (A) Please provide exploratory excavation report for EE11B and confirmation sampling results. (B) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area.

- SC 59. **Site IR-58, RA 58-4:** (A) It was originally stated in the RMR meeting that exploratory excavation EE11B occurred at this site. Please verify where the removal occurred. (B) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area.
- SC 60. **Site IR-58, DM 7527:** (A) It states in the text that the nickel concentration was below the HPAL. However, nickel was detected at 1850 mg/kg while the HPAL listed in the text is 1091 mg/kg. Please clarify this issue. (B) Please provide explanation as to why chromium is not of concern when it was detected at 615 mg/kg and is above the industrial PRG. (C) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area. (D) The conclusion presented in the text is only applicable if the Navy can demonstrate that the nickel and chromium exceedances are below ambient levels. This should be presented graphically or output from a statistical analysis should be presented in the report.
- SC 61. **Site IR-58, DM 7727:** (A) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area. (B) Under a residential scenario, no remedial action is required since the chemical concentrations are below background level. Thus, no further evaluation is required as stated in the worksheet.
- SC 62. **Site IR-58, DM 7728:** (A) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area. (B) Please provide further explanation to why chrysene concentration is associated with asphalt at 2 feet bgs. (C) The manganese concentration in addition to being below the HPAL is also below the residential PRG of 3100 mg/kg.
- SC 63. **Site IR-58, DM 7930:** (A) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area. (B) Please provide evidence that the manganese concentration is related to chert.
- SC 64. **Site IR-58, DM 8025:** (A) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area. (B) The manganese concentration in addition to being below the HPAL is also below the residential PRG of 3100 mg/kg. (C) In the worksheet, it states that the dieldrin concentration is a risk driver under the residential reuse scenario. However, the maximum measured concentration is below the 1998 PRG for residential soil. Please verify the dieldrin concentration and compare against residential PRG to determine if a residential risk exist at this de minimis area.
- SC 65. **Site IR-58, DM 8029:** (A) Please provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this

area. (B) The beryllium concentration in addition to being below the HPAL is also below the industrial PRG of 3400 mg/kg.

- SC 66. **Site IR-58, DM 8127:** (A) Please provide further discussion in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area. (B) Please note in the text that the detected lead concentration was above the residential cleanup level of 169 mg/kg. (C) Please include DTSC as recommending no CERCLA remedial action at de minimis 8127. EPA should be listed with DTSC and the City as recommending remedial action at surface location PA58SS05. (D) In the worksheet, it states that the “lead concentration exceeded the residential PRG criteria and the EPA’s residential uptake biokinetic model.” This sentence needs to be reworded since the residential PRG is based on EPA’s biokinetic model for acceptable blood-lead levels in children. (E) In the Action Required Section of the worksheet, CERCLA remedial action should be selected instead of the option to implement institutional controls in order for it to be consistent with the recommendations.
- SC 67. **Site IR-58, DM 8130:** (A) Please note that the chemical concentrations used in the risk assessment are termed “exposure point concentrations”. The reasonable maximum exposure (RME) is generally used to referred to the exposure assumptions used in the dose calculation. (B) Please provide further discussion for provide supporting evidence in which to base the conclusion that “chemicals driving risk are not considered a source of the groundwater contamination area”. From the site maps, it appears that there are no wells located near this area.
- SC 68. **Site IR-58, DM 8425:** (A) The land use for this site borders between mixed use and educational and cultural reuse. Please note that the chemical concentrations used in the risk assessment are termed “exposure point concentrations”. The reasonable maximum exposure (RME) is generally used to referred to the exposure assumptions used in the dose calculation. (B) Tetrachloroethane, 1,4-dichlorobenzene, and trichloroethene were detected in groundwater at the site. Please provide explanation as to why these chemicals were not identified as being detected in groundwater in the text. In addition, the presence of these chemicals in groundwater indicates that this media is already impacted from previous activities. (C) The maximum detected concentration of benzo(a)pyrene was 0.15 mg/kg at 6.75 feet. This should be corrected in the risk driver table.
- SC 69. **Site IR-64, RA 64-1:** Please provide worksheets and write-ups for this remediation area.

Enclosed is a table summarizing the recommendations based on the draft Parcel C RMR Submittal. The recommendations presented in this table are general and are meant to provide a comparison of the different agency views.

Site ID	Land Use	Recommendations			
		US EPA	DTSC	City	Navy
RA 25-1	mixed use	Remediate	Remediate	Remediate	NFA
RA 25-2	mixed use	Remediate	Remediate	Remediate	Remediate
RA 25-3	mixed use	Remediate	Remediate	Remediate	Remediate
RA 25-4	missing writeup				
DM B3822	mixed use	removed as part of Parcel B remedial action			
DM B3924	mixed use	Remediate	Remediate	Remediate	NFA
DM B3926	mixed use	NFA	Verify Mn Conc	NFA	NFA
DM B4126	mixed use	NFA	NFA	NFA	NFA
DM 9307	industrial	NFA	NFA	NFA	NFA
RA 28-1	industrial	Remediate	Remediate	Remediate	Remediate
RA 28-2	mixed use	Remediate	Remediate	Remediate	Remediate
RA 28-3	R&D	Remediate	Remediate	Remediate	Remediate
RA 28-4	R&D	NFA (Ind)	Remediate (Res); NFA (Ind)	Remediate (Res)	NFA ( Ind)
RA 28-5	R&D	NFA	NFA	NFA	NFA
RA 28-6	R&D	NFA	NFA	NFA	NFA
RA 28-7	R&D	NFA	NFA	NFA	NFA
RA 28-8	R&D	NFA	NFA	NFA	NFA
RA 28-9	E&C	NFA	Undecided	NFA	NFA
RA 28-10	R&D	Remediate DM SS15	Remediate DM SS15	Remediate DM SS15	Remediate DM SS15
RA 28-11	E&C	NFA	Remediate	Remediate	NFA
RA 28-12	E&C	NFA	NFA	NFA	NFA
RA 28-13	mixed use	NFA (Ind)	NFA (Ind); Characterize (Res)	NFA (Ind); Characterize (Res)	NFA
RA 28-14	open space	NFA	NFA	NFA	NFA
RA 28-15	open space	NFA	NFA	NFA	NFA
RA 28-16	E&C	NFA	NFA	NFA	NFA

Site ID	Land Use	Recommendations			
RA 28-17	open space	NFA	NFA	NFA	NFA
RA 28-18	R&D	Remediate	Remediate	Remediate	NFA
RA 28-19	E&C	NFA	Characterize	Characterize	NFA
RA 28-21	mixed use	NFA	NFA (Ind); Characterize (Res)	NFA (Ind); Characterize (Res)	NFA
DM 8334	R&D	NFA	NFA	NFA	NFA
DM 9336	E&C	NFA (IC)	Characterize	Characterize	NFA (IC)
DM 9434	R&D	NFA	NFA	NFA	NFA
DM 9532	R&D	NFA	NFA	NFA	NFA
DM 9618	E&C	NFA	NFA	NFA	NFA
DM 9621	E&C	NFA	NFA	NFA	NFA
DM 9721	E&C	NFA	NFA	NFA	NFA
DM 9819	E&C	NFA	NFA	NFA	NFA
DM 9824	E&C	NFA	NFA	NFA	NFA
DM 9919	E&C	NFA	NFA	NFA	NFA
DM 9921	E&C	NFA	NFA	NFA	NFA
DM 10112	open/E&C	NFA	NFA	NFA	NFA
DM 10204	open space	NFA	NFA	NFA	NFA
DM 10220	E&C	NFA	NFA	NFA	NFA
DM 10329	open space	NFA	NFA	NFA	NFA
DM 55SS15	R&D	Remediate	Remediate	Remediate	Remediate
RA 29-1	R&D	Remediate	Remediate	Remediate	Remediate
RA 29-2	R&D	Remediate	Remediate	Remediate	Remediate
RA 29-3	R&D	NFA	NFA	NFA	NFA
RA 29-4	R&D	Combine with RA 29-2, remediate starting from RA 29-2			
RA 29-6	mixed use	NFA	Remediate	Remediate	NFA
RA 29-7	mixed use	Remediate	Remediate	Remediate	Remediate
DM 8343	R&D	NFA	NFA	NFA	NFA
RA 30-1	missing writeup				
RA 57-1	maritime	NFA	NFA	NFA	NFA
DM 8944	maritime	NFA	NFA	NFA	NFA

Site ID	Land Use	Recommendations			
DM 9654	maritime	NFA	NFA	NFA	NFA
RA 58-1	mixed use	NFA	NFA	NFA	NFA
RA 58-2	mixed use	NFA	NFA	NFA	NFA
RA 58-4	mixed use	NFA	NFA	NFA	NFA
DM 7527	mixed use	NFA (Show Ni and Cr Regression Analysis)			
DM 7727	mixed use	NFA	NFA	NFA	NFA
DM 7728	mixed use	NFA	NFA	NFA	NFA
DM 7930	mixed use	NFA	NFA	NFA	NFA
DM 8025	mixed use	NFA	NFA	NFA	NFA
DM 8029	mixed use	NFA	NFA	NFA	NFA
DM 8127	mixed use	NFA (Ind); Remediate (Res)	NFA (Ind); Remediate (Res)	NFA (Ind); Remediate (Res)	NFA
DM 8130	R&D	NFA	Evaluate	NFA	NFA
DM 8425	mixed/E&C	NFA	NFA	NFA	NFA
RA 64-1	missing writeup				

Notes:

NFA: No Further Action

E&C: Educational and Cultural land use

Res: Residential

Cr: Chromium Mn: Manganese

IC: Institutional Controls

R&D: Research and Development land use

Ind: Industrial

Ni: nickel