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August 5, 1997

N00217.004159
HUNTERS POINT
SSIC NO. 5090.3

Christine Shirley
Environmental Analyst
Arc Ecology
833 Market Street
San Francisco, CA 94103

Subject: Response to Comments on the Parcel C Draft Feasibility Study, Hunters Point Shipyard

Dear Ms. Shirley:

PRC Environmental Management, Inc. (PRC) has prepared this letter on behalf of the Navy to respond to the comment submitted to the Navy on April 18, 1997 concerning the Parcel C Draft Feasibility Study.

The Navy has reviewed the Arc Ecology comment regarding the use of method detection limits (MDLs) to adjust target cleanup levels (TCLs) for the Parcel C Feasibility Study (FS). The Navy appreciates your concern and is interested in cleaning up Hunters Point Shipyard (HPS) using the best available technology consistent with the Remedial Investigation/Feasibility Study (RI/FS) program. The following items are provided to clarify the technical approach used in the FS.

- TCLs were adjusted only when the calculated cancer cleanup level or noncancer cleanup level were less than the MDLs. The MDLs listed in Tables 3-2a, 3-2b, and 3-2c present USEPA Contract Laboratory Program (CLP) Statement of Work detection limits and are consistent with the RI/FS program at HPS. Although more sensitive analytical methods may be selected for certain compounds, the CLP MDLs presented in Table 3-2 are EPA approved detection limits used during the site characterization activities at HPS. The MDLs shown in Table 3-2 are based on the best available technology and widely-accepted analytical methods. It is inappropriate to base current TCLs on the assumption that more sensitive analytical methods will be developed in the future during cleanup activities at HPS.
- The preferred soil alternative (Soil Cleanup Goal Scenario 1) for Parcel C at HPS proposes removing contaminants in soil between 0 and 10 feet below ground surface that contribute significantly to an excess lifetime cancer risk (ELCR) exceeding 1×10^{-5} . As shown on Table 3-2a, MDLs were not used as a basis for setting TCLs for Soil Cleanup Goal Scenario 1. Therefore, TCLs were not adjusted and this is not applicable at Parcel C for this soil cleanup goal scenario.

If you have any questions regarding this matter, please contact Glenna Clark at (415) 244-2659.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Gould".

Jon Gould
Hydrogeologist