

Arc Ecology

Environment, Economy, Society, & Peace

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Thank you for the opportunity to comment on the Hunters Point Shipyard Parcel E-2 Remedial Investigation/Feasibility Study (draft) March 2007. The following comments are presented in a simple numbered list for convenience in referring to them.

1. The study is well organized with copious information provided in the tables, figures, appendices, and list of references that thoroughly document the results so far of the remedial investigation.
2. According to the Executive Summary (ES-2.4), groundwater near the PCB hotspot was especially contaminated before the removal action but the well to monitor the groundwater here was removed for the removal action. When will there be information available to assess whether the removal action was successful and to determine the present state of contamination of the groundwater at this location?
3. The feasibility study portion of the Draft RI/FS is weakened by the absence of the radiological addendum because, according to Table 6-7 in the Historical Radiological Assessment, 12 of 33 separate buildings or areas in Parcel E, which includes E-2, were not sampled until the 2002 Phase V Radiological Investigation. This is the information that is presumably to be contained in the radiological addendum to the RI/FS. It is difficult if not impossible to make an informed assessment of remedial alternatives without considering the radiological information because it is known that the landfill contains radiological material. Please include the Phase V radiological investigation information for Parcel E and E-2 in the next draft of the RI/FS.
4. The feasibility study only has three alternatives: no action, complete excavation and removal, and containment (cap and treat). There should be additional alternatives for consideration, especially some variations on the excavation alternative such as partial excavation of "hot spots" as was done for the time critical removal actions of the metal reef and metal slag areas. Please include additional alternative remedies beyond the three listed in the draft RI/FS.
5. The comparative evaluation of alternatives appears to be skewed in favor of the containment alternative, almost as if the CERCLA Municipal Landfill presumptive remedy were being applied to the E-2 cleanup. However, according to Environmental Protection Agency Directive No. 9355.0-67FS (EPA/540/F-96/020) "if excavation of the landfill contents is being considered as an alternative, the presumptive remedy should not be used." Please clarify in the FS that a presumptive remedy is not being proposed, but instead containment is being considered as one of the possible remedies.

6. According to EPA guidance on land use with regard to remedy selection, the Base Realignment and Closure Team should work closely with the local reuse group responsible for developing the reuse alternatives for the site after cleanup. Although existing San Francisco Redevelopment Agency plans call for the area of Parcel E-2 to be open space, a voter referendum in San Francisco (Proposition P) called for Hunters Point Shipyard to be cleaned up to the highest possible level. This could be interpreted as to residential standards, not just "open space." Community acceptance is one of the criteria to be considered in alternative selection so please explicitly discuss how the Navy has worked with the appropriate group(s) to plan reuse, and the relevance and applicability of the Proposition P voter referendum to the appropriate level of cleanup for Parcel E-2.
7. In the comparative evaluation of alternatives, the cost of the excavation alternative appears to greatly exceed the cost of the containment alternative. However, no information is presented about how long the cap will be effective or how much periodic replacement will cost. Landfill closures typically use 30 years as the lifetime, but at least three to four times this long should be used for residential and open space planning for HPS. Please adjust the cost comparisons to accommodate at least a 100-year time horizon and the 100-year costs for each alternative.
8. The excavation alternative was rated less implementable than the containment because of the amount of material needing to be excavated. The volume of the landfill is approximately 461,000 cubic yards (22 acres x 13 feet deep on average). This is a substantial amount of material but at least 44,500 cubic yards were excavated and disposed of in the PCB hotspot TCRA, and other large quantities of soil and debris have also been taken care of at HPS. In this context the amount of material in the entire landfill does not seem so large as to pose an infeasible problem, especially when it should be acknowledged that a lot of dirt and other material would have to be moved and processed to prepare and groom a cap and cover under the containment alternative. Please list the amounts of material that would be moved around in preparing for a containment remedy and to make it possible to see that the excavation alternative is implementable and perhaps equally implementable as the containment alternative.
9. Historically the Parcel E-2 Landfill was not dry land or a pit excavated for a landfill but was, in fact, part of San Francisco Bay. A reasonable alternative to capping and retaining this toxic fill would be to excavate it and to restore the small bay and aquatic habitat that have been destroyed by the landfill. This would reduce the cost of excavation and fill by deleting the fill portion, and could potentially be used to mitigate other impacts to wetlands, waters, or other aquatic habitats on or adjacent to HPS. Please develop and evaluate an alternative remedy that excavates the landfill and restores the site as much as possible to its historic state as part of San Francisco Bay.
10. Excavation and restoration of the landfill area to be part of San Francisco Bay could have a beneficial impact on water quality of groundwater and surface water reaching the bay., especially if a treatment wetland were included as part of the restoration. Please consider the water quality benefits and relative costs to obtain them of such an alternative compared with those of a containment alternative.
11. The San Francisco Bay Conservation and Development Commission recently prepared a report on the impacts to the SF Bay shoreline of potential sea level rise. They mapped a 1-meter rise by the year 2100 as an example. This inundated part of Parcels E and E-2. Moreover, with rising sea levels the frequency of 100-year floods increases so they are

more like 5-10 year floods. Please include the projected effects of sea level rise over at least 100 years due to global warming in the plans and costs of remedial alternatives for Parcel E-2.

I look forward to seeing the next draft of the RI/FS. Please contact me if there are any questions about my comments.

Sincerely,

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