



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Deborah O. Raphael, Director
700 Heinz Avenue
Berkeley, California 94710-2721



Edmund G. Brown Jr.
Governor

August 12, 2011

Mr. Keith Forman
Department of the Navy
1455 Frazee Road Suite 900
San Diego, CA 92108-4310

COMMENTS TO DRAFT FINAL PROPOSED PLAN FOR PARCEL E-2, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Dear Mr. Forman:

The Department of Toxic Substances Control (DTSC) thanks you for the opportunity to review the Draft Final Proposed Plan for Parcel E-2, Hunters Point Shipyard, San Francisco, California dated August 2, 2011 (Proposed Plan). The California Department of Resources Recycling and Recovery (CalRecycle) has received and reviewed the Proposed Plan and has no further comments (enclosure). The California Department of Public Health (CDPH) has also received the Proposed Plan and their comments will be provided under a separate cover.

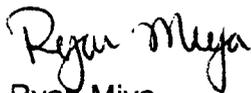
The Proposed Plan was revised after receiving comments from DTSC and CalRecycle on June 29, 2011. Based on our review of the Proposed Plan and the Navy's responses to comments, DTSC has the following comment:

- = Navy's response to Robert Elliott's specific comment #3; 2nd bullet item in the Proposed Activity Restrictions section. DTSC does not agree that it's concern is addressed by the bullet item identified. That item is more related to activities that would lead to migration of contaminated groundwater and not just exposing it by accessing it while conducting some other activity. Therefore, DTSC requests that access to groundwater be added as a restriction so that it can only occur with approval by the FAA signatories. This will ensure that a work plan is in place if groundwater is to be exposed and ensure protection of human health from contact with contaminated groundwater. Such a restriction is consistent with the second bullet in the RAOs for groundwater. The prohibition on use is also not adequate to protect someone from coming into contact with contaminated groundwater.

Mr. Forman
August 12, 2011
Page 2

If you have any questions, please contact me at 510-540-3775 or by e-mail at rmiya@dtsc.ca.gov.

Sincerely,



Ryan Miya
Senior Hazardous Substances Scientist
Brownfields and Environmental Restoration
Program - Berkeley

Enclosure

E-mail distribution with enclosure:

Mr. Mark Ripperda, U.S. Environmental Protection Agency Region IX
Mr. Craig Cooper, U.S. Environmental Protection Agency Region IX
Mr. Ross Steenson, Regional Water Quality Control Board, San Francisco Bay Region
Ms. Tracy Jue, California Department of Public Health
Mr. Larry Morgan, California Department of Public Health
Mr. Alred Worcester, Department of Resources Recycling and Recovery - CalRecycle
Ms. Amy Brownell, City of San Francisco
Ms. Melanie Kito, Department of the Navy
Mr. Doug Bielskis, ERRG
Ms. Leslie Lundgren, CH2M HILL

From: "Worcester, Alfred" <Alfred.Worcester@CalRecycle.ca.gov>
To: 'Ryan Miya' <RMiya@dtsc.ca.gov>
Date: 8/11/2011 3:39 PM
Subject: Hunters Point Parcel E-2

Hello Ryan:

I have no further comments to the response that were provided by Lara Urizar, comments that were in response to my review of the Draft Final Proposed Plan for Parcel E-2. Their comments appear satisfactory.

Alfred P. Worcester, PG, CEG
Closure and Facility Engineering
Engineering Support Branch
Compliance and Enforcement Division
CalRecycle
Office: 916.341.6353
Cel: 916.613.6053 (telework Thursday)

-----Original Message-----

From: Ryan Miya [mailto:RMiya@dtsc.ca.gov]
Sent: Thursday, August 11, 2011 2:38 PM
To: Worcester, Alfred
Subject: Military and municipal wastes

Alfred,

Could you please give me a quick call when you have a chance? I received an inquiry about Hunters Point Shipyard and wanted to confer with you before providing a response. Thanks!
Ryan

Ryan Miya
Senior Hazardous Substances Scientist
Brownfields and Environmental Restoration Program - Berkeley Office
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, CA 94710-2721
Phone: 510-540-3775
FAX: 510-540-3819