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Date: 08/04/2011 04:08 PM  
Subject: Draft EPA comments on the DF PP for E-2

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Hi Lara, I'm sending you draft comments because I'm going to be out tomorrow through all of next week, in Texas, helping my parents move. These are all of my comments, but Bob or Jackie may have something more. If you don't receive anything additional from me or them by August 12, take these as our final comments.

Many of my additions of detail or requests for more detail in the Draft were driven by an overriding comment from Bob that the PP was unacceptably vague. I think that the DF addressed that, but I just got the same comment from him. I'm not going to be around to work this out with him in person, but I do believe that the DF PP, with my few additional comments, provides an appropriate description of the remedy and will be in email communication with him (and you) and hopefully convince him that he'll get all his extra details in the ROD.

I'm sure that you'd rather not include actions levels for the excavations in the PP, but that is one of the examples of unacceptable vagueness that Bob has constantly pointed to. Other details have been added already, or I can convince him are unnecessary, but please find a way to include excavation drivers somewhere appropriate.

## EPA Comments on the Draft Final Proposed Plan for Hunters Point Parcel E-2

Page 1, Bullet #4 – Perhaps change to: “Install below ground barriers to minimize groundwater flow from the landfill to the Bay” rather than “Install below ground barriers to keep groundwater in the landfill from entering San Francisco Bay”.

Page 6 – Add Storm and Sewer line rad excavations to the list of removal actions.

Page 8, HHRA, Paragraph 3 - The risk discussions artfully handles the issue of presenting risks and the risk range in an understandable yet legally accurate way; good job. My comment had sacrificed legal accuracy for simplicity and you fixed that. However, the last sentence should say that the “Navy’s approach ... meets the most conservative end of the risk management range established by EPA”. You’re meeting, not exceeding, EPA’s risk based cleanup range.

Page 9, RAOs – Thank you for streamlining the PRG tables. However, the text still doesn’t directly tie some of the actions to the PRGs. The sentences from Paragraph Two of the RAOs: “Most of the remedial action objectives include PRGs. Exposure to chemical concentrations exceeding the PRGs poses an unacceptable risk that would be addressed by the remedial actions” is true for the cover, but doesn’t address what is driving the excavations. We realize that you’re trying to not make the PP overly complex, but by being vague with statements elsewhere in the text that “the excavations address the most contaminated soil”, you’re making things more complicated rather than more simple. Please state in the appropriate excavation description, or in the PRG tables, that soil in the East Adjacent Area and Panhandle is being excavated to meet goals of XXX for PCBs and lead (and any other drivers), and that sediment along the shoreline is being excavated to meet XXX for PCBs (and any other drivers).

Page 10, Alternative 3 – We disagree with the response to our comment #61, which asked that ICs be included in the text description of the alternatives. The response pointed the reader to Table 7, but ICs are as important as the other elements described in the text on this page, and are a critical distinction between Alternative #2 and Alternatives #3, 4, and 5. Please include the single sentence describing ICs from Table 7 in the Alternative #3 description.

Page 10, Alternative Descriptions – We had asked for more detail about specific thicknesses of the cover in various areas, hoping that the two-foot minimum was a generic default and that the rad-impacted areas would include a three-foot thickness to be consistent with IR 07/18. Recognizing that the difference between 2 and 3 feet doesn’t change the cover concept for the purposes of public input, we won’t demand the added complexity of a complete cover design description in the PP. However, we will be asking for that level of detail in the ROD and will be working with CDPH to get their approval for the cover thickness in rad- impacted areas as was done at IR 07/18. Note that this might mean a three-foot thick cover in some areas. Nothing in the current PP language precludes adding extra thickness, so no responses or changes are necessary for this comment.

Page 14, Landfill Gas: Please change the sentence “An enclosed flare involves controlled burning of methane and low levels of other organic chemicals.” To “An enclosed flare involves controlled burning of the gases captured from the landfill”.