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November 27, 2012

Mr. Keith Forman
Department of the Navy
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COMMENTS TO DRAFT PROPOSED PLAN FOR PARCELS E AND UC-3, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA

Dear Mr. Forman:

Thank you for the opportunity to review the Draft Proposed Plan for Parcels E and UC-3, Hunters Point Naval Shipyard, San Francisco, California, dated October 26, 2012 (Draft Proposed Plan).

Based on our review of the Draft Proposed Plan, DTSC has the following comments:

- (1) Past Removal Actions and Current Conditions. Page 6, last paragraph. Please consider adding “radioactive chemicals” to the list of chemicals identified as found in soil and groundwater.
- (2) Summary of the Preferred Alternatives. Soil and Shoreline Sediment (Alternative S-4), Page 13.
 - (a) Paragraph one. Please specify general planned excavation depths (e.g. – generally x to x feet deep and up to xx feet below ground surface) and also indicate that final depths of each excavation will be determined during remedy implementation based on soil confirmation sampling.
 - (b) Paragraph two. Please clarify if the Parcel UC-3 area not identified as “Asphalt Cover or Building Footprint” in Figure 9 contains existing asphalt and concrete surfaces that will be repaired.
- (3) Summary of the Preferred Alternatives. Groundwater (Alternative GW-3) Page 14, paragraph two. The text refers to “below-ground barriers” which appear to be presented as “slurry walls” in Figure 10. For consistency, please consider consistent nomenclature between the text and figures. Otherwise, please provide a brief and general description of a slurry wall in the text.

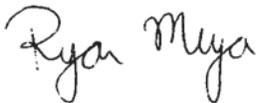
- (4) Summary of the Preferred Alternatives. Contamination at Former Oil Ponds (Alternative O-4), page 15. While the text on Page 6 states that “a second treatability study (planned for 2013), involving field testing of two cleanup technologies, will be performed to identify the best ways to remove or treat the remaining oil contamination,” the text in this section proposes that a combination of technologies will be used to achieve RAOs. Please make sure that the scope of alternatives provided in Alternative O-4 is broad enough to include all of the cleanup technologies being considered at this time. The second treatability study planned for 2013 should be conducted and used as an additional technical basis for the final Former Oil Pond (IR-03) remedy provided in the upcoming Record of Decision for Parcel E.
- (5) Summary of the Preferred Alternatives. Residual Radiological Contamination (Alternative R-2) Page 15. If known, please clarify in your responses to these comments if the Navy will likely seek parcel-wide Recommendation for Unrestricted Radiological Release (RURR) from the California Department of Public Health (CDPH) Environmental Management Branch for Parcel E or the future transferee will more likely seek a license / license exemption from the CDPH Radiological Health Branch for Parcel E due to radiologically-impacted areas outside of the buildings and building sites identified in the Historical Radiological Assessment (HRA).
- (6) Glossary of Technical Terms. Please revise the definition of DTSC to state that our mission is “to protect California's people and environment from harmful effects of toxic substances through the restoration of contaminated resources, enforcement, regulation and pollution prevention” as stated on our website.
- (7) Figure 4 – Radiological Cleanup Areas. Please clarify if the white areas within Parcel E are actually areas where “no radiological cleanup” is required based on the HRA and should instead be colored yellow. In addition, Parcel UC-3 in its entirety should be highlighted in green since the Navy has already received the parcel-wide RURR memorandum from the state of California.
- (8) Figure 6 – Reuse Areas. It appears that the middle portion of Parcel UC-3 does not have a reuse assigned. Please either verify if this is correct or place the appropriate reuse for this area accordingly. In addition, please verify if this area was previously evaluated for industrial or residential reuse in the Human Health Risk Assessment.
- (9) Table 8 – Remedial Alternatives for Soil and Shoreline Sediment. Please verify and revise the table to state which alternative(s) include excavation of the “TPH locations” presented in Figure 7.

Editorial comments:

- (10) Page 3. Please verify if Crisp "Avenue" should instead be Crisp "Road." The same comment also applies to page 5, last paragraph of the Site Background subsection as well as page 13, second paragraph of the Soil and Shoreline Sediment (Alternative S-4) subsection. A document-wide search and change, as needed, is recommended.
- (11) Page 4. Please verify the approximate total acreage for Parcel E (128 or 138 total acres?).
- (12) Page 18. Please update my contact information by removing "Suite 200" from the mailing address as well as revising the e-mail address to Ryan.Miya@dtsc.ca.gov.
- (13) Table 9, Alternative GW-4. The first sentence refers to an Alternative GW-3A but instead likely refers to Alternative GW-3.
- (14) Table 15. Remedial alternative R-3 should be changed from a 2-foot-thick soil cover to a 3-foot-thick soil cover.

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

Sincerely,



Ryan Miya
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Brownfields and Environmental Restoration
Program - Berkeley

E-mail distribution:

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