

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

SEVENTEENTH FLOOR

FOUR EMBARCADERO CENTER

SAN FRANCISCO, CALIFORNIA 94111-4106

TELEPHONE (415) 434-9100

FACSIMILE (415) 434-3947

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WRITER'S DIRECT LINE

OUR FILE NUMBER

Mr. Richard Mach
Department of the Navy
Naval Facilities Engineering Command
Southwest Division, BRAC Office
1220 Pacific Highway
San Diego, CA 92132-5190

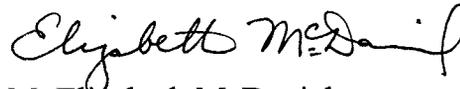
Subject: Draft Final Petroleum Hydrocarbon Corrective Action Plan,
Parcel B, Hunters Point Shipyard, San Francisco, California

Dear Mr. Mach:

Enclosed are comments from Lennar/BVHP Partners on the above-referenced document.

Please call me at (415) 774-2946 if you have any questions.

Very truly yours,



M. Elizabeth McDaniel

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Enclosure

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cc: Ms. Claire Trombadore EPA Region IX
Ms. Sheryl Lauth EPA Region IX
Mr. Chein Kao DTSC
Mr. Brad Job RWQCB
Mr. William Radzevich, Code 6229
Mr. Don Bradshaw
Elaine Warren, Esq.
Rona Sandler, Esq.
Ms. Amy Brownell
Mr. Jessie Blout
Mr. Roy Willis

LENNAR /BVHP COMMENTS ON THE DRAFT FINAL PETROLEUM
HYDROCARBON CORRECTIVE ACTION PLAN, PARCEL B,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

The following are Lennar/BVHP Partners' comments on the above-referenced document.

Comment 1: Section 3.3.1, second to last paragraph, first sentence, states, "Soil source areas will be removed to conform with RWQCB criteria 1 and 2 to ensure that soils that may continue to leach contaminants to groundwater are removed from the site." It should be clarified, however, that soil source areas that are below the water table will not be removed, and may continue to leach contaminants to groundwater. Therefore, the sentence should be revised to indicate that only soil source areas above the water table will be removed.

Comment 2: Results of the June 2000 groundwater sampling event should be included on Figure 4-2. Also, monitoring wells that were not sampled in April/May 1999 should be indicated on Figure 4-2. The existing figure only includes pre-1999 and April/May 1999 sampling results. The figure is misleading because not all applicable data are included. For example, the only location within Parcel B where TPH concentrations have remained relatively constant is at monitoring well PA24MW03A (TPHd was 84 mg/L during the RI and 96 mg/L in July 2000). Figure 4-2 does not illustrate this, however, because this well was not sampled in April/May 1999, but was sampled in June 2000.

Comment 3: Monitoring well "PA25MW03A" was incorrectly referenced in the first paragraph of Section 4.5.2. It should be changed to PA24MW03A.

Comment 4: Section 4.5.2, Former USTs S-136 (UT03 in IR Site 23) and S-135 (UT02 in IR Site 62), first paragraph, fourth sentence, states, "As a result of removal activities in IR Site 62, well UT02MW16A was not available for sampling during the April/May 1999 monitoring event." According to Table 5-3, this well was not sampled during the April/May 1999 or June 2000 monitoring events. We request that the Navy clarify the status of this well.

Comment 5: Table 5-3 indicates that diesel concentrations in well UT02MW15A increased from 400 ug/L in April/May 1999 to 2,500 ug/L in June 2000. This does not support the conclusion that the TPH plume has degraded in this area. Also, the 2,500 ug/L value should be bold in Table 5-3 to indicate that it exceeds the 1.4 mg/L (1,400 ug/L) TTPH remediation criteria. We request that the Navy either justify its no further action proposal for this area or conduct additional investigation and/or appropriate corrective action at this location.

Comment 6: Section 5.2, fourth paragraph, states, “Based on the hydrogeologic conditions summarized above, the Navy proposes no further action for detected TPH concentrations in the discontinuous B-aquifer and bedrock water-bearing zones.” The rationale for no further action for the B-aquifer and bedrock water-bearing zones is inadequate. For example, the bedrock is highly heterogeneous and may provide currently unknown pathways for contaminant migration to the bay. The Navy should provide further justification for proposing no further action in these zones.

Comment 7: Section 6.2, second paragraph, second sentence, monitoring well “PAMW03A” was incorrectly referenced. It should be changed to PA24MW03A.

Comment 8: Table 5-1 indicates that the TTPH concentration in IR06MW27A exceeded the remediation criteria in pre-1999 samples. Results from April/May 1999 and June 2000 are unavailable. Given that the remediation criteria was exceeded in this well, the Navy should clarify why this well has not been resampled and either provide justification for its no further action proposal for this area or conduct additional investigation and/or corrective action at this location.

Comment 9: Section 6.2, second paragraph, second sentence, states, “It is likely that TPH contamination is not impacting the bay since contaminant concentrations decrease to non-detect concentrations within approximately 50 feet of monitoring well PAMW03A (*actually PA24MW03A*) (evidenced by the nearest monitoring well to the north) ...” This statement is confusing, as no monitoring wells are shown within approximately 50 feet north of well PA24MW03A on Figure 4-2 or on Figure 5-2. Monitoring well IR46MW48A is located over 150 feet northwest of well PA24MW03A and does not appear to be located hydraulically downgradient of well PA24MW03A. The text and figure should be clarified to indicate the name of the well referred to and a more accurate description of the location of the well relative to well PA24MW03A. We understand, however, that an additional sentry monitoring well has been recommended for this area (see comment 10).

Comment 10: Section 7.0, third paragraph, third sentence, states, “... it is recommended an additional sentry monitoring well be installed downgradient of well PA24MW03A, immediately inland from the shoreline. The well should be sampled and analyzed for TPH fractions.” The Navy should clarify that this well will be installed and sampled and appropriate corrective action will be implemented if there is evidence of migration of contaminants to the bay.

Comment 11: Additional information or appropriate reference document should be provided regarding the proposed soil sampling and excavation programs. The document should describe and/or illustrate the locations for pre-excavation and confirmation soil sampling, the spacing between sampling locations, the depth of sampling locations, and the analytical program for each sample, including quality assurance/quality control procedures. Ultimately, this document should illustrate the estimated extent of the soil excavations.

Comment 12: The existing historical TPH groundwater database is inadequate. The document should state that wells that historically have reported groundwater concentrations exceeding the TPH remediation criteria that are not currently included in the Parcel B groundwater monitoring program will be added to the Parcel B quarterly groundwater monitoring program. Given the known seasonal fluctuations in water levels at the site and known effects that these fluctuations can have upon concentration data, these data need to be collected to allow the Navy to justifiably remove wells in which TPH was detected from any corrective action program.