



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 31, 2000

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

RE: EPA Review of Navy Technical Justification for the Parcel B-F Interface, Beach
Armorization Conceptual Design, October 19, 2000, Hunters Point Shipyard

Dear Mr. Mach:

EPA has reviewed the Navy's proposal for the Parcel B- F interface. The proposal is outlined in a letter from the Navy to the regulators dated October 19, 2000. In general, EPA finds the approach acceptable. EPA understands that the beach armorization will be an interim action and that its long term effectiveness will be further assessed during the Parcel F feasibility study. In addition, it is EPA's understanding that the Navy has shared its proposal with the City of San Francisco and has determined that the proposal is consistent with the City's Redevelopment Plan. However, despite EPA concurring with the Navy's proposal in concept, the details of how this proposal will be executed must be further discussed among the BCT and concurred upon by the regulators. Specifically, how the change in the Parcel B-F interface will be documented for the administrative record and for the public. The Navy proposes an Explanation of Significant Differences to the Parcel B ROD and upon further review of EPA guidance on post ROD changes, this appears to be the appropriate approach. In addition, the BCT must concur that the interim action proposed will protect human health and the environment as the original Parcel B remedial action would have (e.g., that the exposure pathway for any residual contamination at IR-7 is eliminated by the interim action). Finally, EPA would like additional detail on the Navy's proposal with respect to the portion of the Navy's proposal which states: "the Navy will remove as much of the upland contaminated soil as practicable."

EPA looks forward to meeting with the BCT in the near future to discuss the Navy's proposal in greater detail. If you have any questions about this letter, please contact me at (415)744-2409.

Sincerely,

A handwritten signature in cursive script, appearing to read "Claire", followed by a long horizontal line extending to the right.

Claire Trombadore
Remedial Project Manager

cc: Sheryl Lauth, EPA
Chein Kao, DTSC
Brad Job, RWQCB
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