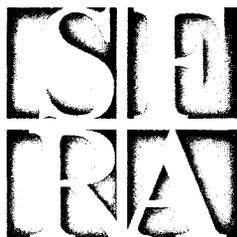


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December 18, 2000

Richard G. Mach
Department of the Navy
Southwest Division BRAC Office
1220 Pacific Highway
San Diego, CA 92132-5190

RE: Parcel C Soil Site Delineation, Draft Sample and Analysis Plan

Dear Mr. Mach:

This letter provides City comments to the following document:

- Draft Sampling and Analysis Plan, Parcel C Soil Site Delineation, Hunters Point Shipyard, San Francisco, California, prepared by Washington Group International, Inc. and Tetra Tech EM Inc. for the Department of the Navy, dated November 16, 2000.

This document consists of two sub-parts: the Draft Field Sampling Plan (FSP) and the Draft Quality Assurance Project Plan (QAPP). As a general comment, this SAP is incomplete for commenting, as well as for use in the field until the 50-foot buffer zone along the residential / industrial boundary, as discussed by the BCT, is documented in this SAP and properly reviewed by the BCT and the City for concurrence.

Due to time constraints the City was not able to complete a review of the document in its entirety, additional comments will be submitted as necessary. The City appreciates the opportunity to provide comments on this document.

Sincerely,

A handwritten signature in black ink, appearing to read 'Don Capobres'.

Don Capobres
Acting Project Manager
Hunters Point Shipyard

cc: Claire Trombadore, EPA
Chien Kao, DTSC
Brad Job, RWQCB
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Don Bradshaw, LFR
Mike Wanta, Tetra Tech

COMMENTS
Draft Sampling and Analysis Plan, Parcel C Soil Site Delineation

Draft Sampling and Analysis Plan Overview

1. Section 1.0: Introduction – IR-49 and IR-51

The first paragraph on p. 2 states: “Samples collected from IR-49 and IR-51 (fuel and PCE transformer fluid sites) are included in the six IR sites above”, namely IR-25, IR-28, IR-29, IR-30, IR-58, and IR-64. It is unclear in this document how IR-49 and IR-51 overlap with the other six IRs, which are located on Parcel C. If the confirmation sampling program outlined in this document is intended to at least partially address fuel and PCB transformer sites, then such “overlap” samples should be clearly identified in Table 1 and/or in Figures 25.01 through 64.01.

2. Section 1.0: Introduction – Detection Limit

Page 2, first bullet, reference is made to “...detection limit of previous samples was higher than 3.0 mg/kg” is the reference to “3.0 mg/kg” correct?

3. Section 1.3: Collection of Post-Excavation Confirmation Samples

This section does not provide a clear discussion of the confirmation sampling program. Clarifying the Confirmation Sampling procedures in this section would be helpful, as it reads now the discussion regarding bottom sampling is confusing. For example,

- A. The discussion of Post Excavation Confirmation Samples in Section 1.3 should be consistent with the description in Section 3.0 Field Methods and Procedures (p. 3) of the Field Sampling Plan.

The first paragraph of Section 1.3 implies that a post-excavation bottom sample will be collected for excavations less than 500 ft² only if the excavation extends to a depth of 10 feet. However, Page 3 of the FSP reads, “one 5-point post-excavation sample will be collected for each 500 ft² (or less for smaller excavations) of the excavation floor for each excavation”. The FSP does not make the 5-point sample contingent on depth. It is the City’s understanding that all excavations, regardless of floor area and depth will be confirmed with a 5-point composite sample. If this is not the case, and the intent is to collect bottom confirmation samples from only certain excavations, a rationale for such an approach needs to be provided in this section.

- B. A discussion of the sidewall confirmation sampling program should be provided here in Section 1.3. Figure 2, which illustrates the sidewall *confirmation* sampling approach, should be referenced in this section. Currently, it is referenced in Section 1.2, which discusses sidewall *delineation* sampling. What is the rationale for not collecting post excavation sidewall confirmation samples similar to the 5-point composite floor sample?

4. Boundary of IR-28

In Figure 1, “Parcel C Location Map”, the boundary of IR-28 is shown as extending into San Francisco Bay in the vicinity of Buildings 224 and 225. There is no apparent basis for this IR extending into the Bay.

Draft Field Sampling Plan

In general, the Figures 25.01 through 64.01 in the Draft Field Sampling Plan clearly convey the necessary information. Some clarification and revisions on these figures are suggested in the comments below.

1. General Comment

The Figures contain the statement under Note 3, "... samples will be analyzed for the analytical group of the COPC..." Does this mean that the entire suite of constituents for the COPC analytical group will be reported?

For example in Table 1, COPC in Soil Remediation Areas In Parcel C, the Planned Analyses for Remediation Area 30-1 are PCBs, PAHs, VOCs, TPH & As, Cd, Cr, Mg, Co, Cu, Mn, Ni, and Zn. Is it correct to interpret this to mean that all samples collected at the 19 subareas (300101 to 300119) will be analyzed for the Planned Analysis (listed in Table 1) and that the full VOC, PAH, PCB suite of constituents will be reported? If not please explain.

2. IR-58: Excavations 58-1 and 58-2

In Figure 2, "Locations of the Soil Delineation Remediation Areas, Subareas, and De Minimus Areas", the labels for excavations 58-1 and 58-2 are apparently switched. Figure 1 of the above-referenced Overview labels these two excavations in a manner consistent with the Parcel C FS (see, for example, Figure D-5, "Locations of Soil Remediation Areas and De Minimus Cleanup Areas, Soil Cleanup Goal Scenario 3, Parcel C Feasibility Study").

3. IR-25: De Minims Area DM B3924

In Figure 2, de minimus area DM B3924, located near excavation 25-1, is not labeled.

4. IR-28: Excavation 28-21

In Figure 28.26, the location of the residential/industrial boundary is not shown.

5. IR-28: 28-19

The legend for this figure and others use the following symbols: %, #, \$. Please explain.

6. Boundary of Residential versus Industrial Reuse Areas

It is our understanding that some process will be developed for addressing excavations that begin in a residential reuse area and, as a consequence of remediation and ensuing confirmation sampling, eventually extend into an industrial reuse area, as well as excavations that begin in an industrial area and eventually extend into a residential area. The Navy, the City, and the regulatory agencies have discussed the concept of applying a 50-foot "buffer zone" for this purpose.

With this issue in mind, the following table identifies those remediation areas, subareas, and de minimus areas that are located near the residential-industrial boundary on Parcel C.

Excavation	Reuse per Reuse Plan – Proposed Clean Up Use	Cleanup per Navy SAP	Comments
IR-28			
28-2	Ed/Cult – Industrial	Industrial	May expand into residential area.
28-6	R&D – Residential	Residential	May expand into industrial area (subareas 280601 and 2807602 are in residential area) or into residential area (subarea 280603 is located in industrial area).
28-17	Open Space – Industrial	Industrial	May expand into residential area (original excavation straddles the boundary).
28-18	Ed/Cult – Industrial	Industrial	May expand into residential area.
28-21	Mixed Use – Residential	Residential/Industrial	Excavation straddles the res./ind. boundary. Unclear what standard Navy is committed to. Table 2 states residential standard applies.
DM 9435	R&D – Residential	Residential	May expand into residential area, if excavation were to cross Nimitz Avenue.
IR-58			
58-1 (should be 58-2)	Mixed Use – Residential	Residential	Mislabeled. In FS drawings, this excavation straddles the res./ind. boundary. Subarea 580101 is immediately adjacent to residential area; and subarea 580102 is near residential area.
58-2 (should be 58-1)	Mixed Use – Residential	Residential	Mislabeled.
DM 7527	Mixed Use – Residential	Residential	May expand into industrial area.
DM 7727	Mixed Use – Residential	Residential	May expand into industrial area.
DM 8127	Mixed Use – Residential	Residential	May expand into industrial area.

A possible approach to applying the “buffer zone” would be as follows:

- If an excavation begins in a residential area but expands toward an industrial area, residential criteria will be applied across the buffer zone to a depth of 10 feet below ground surface and industrial criteria will be applied once past the buffer zone.
- If an excavation begins in an industrial area but expands toward a residential area, residential criteria will be applied once into the buffer zone to a depth of 10 feet and continue into the residential area to a depth of 10 feet below ground surface.

Under such a “buffer zone” approach, the removal action cleanup goals may change as the aerial extent of an excavation expands, as discussed in the following example:

Subarea 280603 of excavation 28-6 is located in an industrial cleanup area, immediately adjacent to a residential cleanup area. If this subarea is located in the buffer zone, then residential criteria apply (as is stated in Table 1, "Chemicals of Potential Concern in Soil Remediation Areas in Parcel C"). If this excavation were to expand toward the west, residential standards would continue to apply. However, if the excavation were to expand toward the east, industrial standards would apply once the excavation extends past the buffer zone.

This kind of change in cleanup standards would need to be kept in mind during the TCRA sampling process. A formal approach needs to be developed and documented to address this issue, such as in an addendum to this Sampling and Analysis Plan for Parcel C. This SAP is incomplete for commenting, as well as for use in the field until an approved approach to the "buffer" zone is developed.

7. Survey Means and Methods

The SAP should have a section to discuss the means and methods used to establish the residential / industrial reuse boundary. If the Navy feels that the SAP is not the document to discuss the survey means and methods, how will the Navy document establishment of this demarcation?

Draft Quality Assurance Project Plan

1. Reporting Limit for Organic Lead

Table B-3 indicates that the cleanup goals for organic lead for industrial and residential removal actions are 0.088 mg/kg and 0.0061 mg/kg, respectively. The table indicates that the laboratory reporting limit for organic lead is 0.6 mg/kg and notes that, for this constituent, the reporting limit exceeds the criteria.

Our discussions with analytical laboratories indicate that 0.5 to 0.6 mg/kg is a common reporting limit for organic lead. The QAPP should address the issue of the reporting limit exceeding the cleanup criteria for organic lead and provide a proposed approach as to what criteria will trigger cleanup.

2. Appendix 1, TCRA-Goals, Table 1-1

The Table 1-1 heading incorrectly references the Table as "TCRA Cleanup Goals Parcel *D* Soil Site Delineation". The Table should be in reference to Parcel *C* Soil Site Delineation.