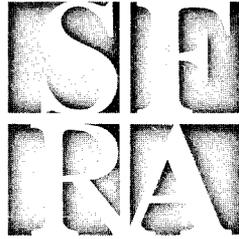


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James B. Morales, Executive Director

April 2, 2001

450-00701-190

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

Re: Final Petroleum Hydrocarbon Corrective Action Plan (CAP), Parcel B, January  
10, 2001

Dear Mr. Mach:

This letter presents additional comments that the City believes have not been fully addressed in the Final CAP. We have also included comments on the Soil Sampling Plan presented on March 2, 2001.

We understand that the CAP is final and that the formal comment period is over, however we have identified several issues that we would like to discuss. The City also believes that it is appropriate for all of these issues to be addressed in the anticipated Regional Board Order requiring implementation of the CAP and further action. If necessary we can meet to discuss these issues.

Sincerely,

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

A. Don Capobres  
Project Manager

cc:

J. Blout, CCSF-MOED  
M. Wanta, Tt EMI  
C. Kao, DTSC  
B. Job, RWQCB  
S. Lauth, EPA  
R. Sandler, CCSF-OCA  
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E. Warren, CCSF-OCA  
A. Brownell, CCSF-DPH  
K. Jensen, SMR&H

Attachment

### **Petroleum Corrective Action Plan Comments**

1. Offsite TPH Soil Exceedence: The CAP cites 5 locations adjacent to IR-18 where soil concentrations of TPH exceed the 3,500-ppm screening criteria, but the detailed information on concentrations, depths, and location of these exceedences was not found in the CAP report. This information is critical for preparing the City's Soil and Groundwater Management Plan as well as evaluating potential constraints on future development.

2. Schedule For TPH Corrective Action: The schedule presented in Table 1-1 is not consistent with the Conveyance Schedule presented in the Memorandum of Agreement (MOA) between the Navy and the City. It is our understanding from subsequent conversations on this issue that the Corrective Action Schedule will be made consistent with the MOA, however it is unclear where or how this new schedule will be documented. In addition, Table 1-1 generally lists Corrective Action tasks via broad season based schedule. The City requires a more detailed schedule and description of what is being proposed in terms of documenting the Corrective Actions on Parcel B. A detailed schedule that lists document submittal dates, review periods and final submittal date is required. This type of information should be incorporated into a Regional Board Order.

It is our understanding that a Regional Board Order will be issued for the petroleum cleanup and abatement program established for the Shipyard. The Order should describe performance criteria, as well as penalties for non-compliance, and other standard provisions.

3. Application of the Aesthetic Criterion: The City understands that the Aesthetic Criterion evaluation will not be performed for those sites where known exceedences of the criterion are located under pavement, or are below surfaces where no visible stains are evident. For example, at IR18BO29, TPH-Motor Oil was detected at 3,200 mg/kg (significantly exceeding the criterion) at 1.25 feet bgs (no overlying pavement present), no further action is recommended at this site. The City's position on this example and other similar examples is for the Navy to investigate these sites (paved or not) by turning the soil over up to a depth of 2-feet bgs to facilitate evaluating the olfactory and visual impacts. Without this level of investigation, the City will bear a disproportionate burden of complying with the aesthetic criterion for the sites where the Navy arguably should have removed their nuisance soil.

In addition, the Navy should apply the aesthetic criterion assessment for soil above petroleum-contaminated groundwater. In this way, past spills or illegal dumping, which was later covered with clean soil or paved over, could be investigated for compliance with the aesthetic criterion.

4. Residuals Management Plan: In reviewing the Final CAP, the City had anticipated a discussion on how residual petroleum contamination (soil defined as TPH-affected) could be used or stored onsite, e.g. under streets or foundations. The City needs this plan in order to prepare its Soil and Groundwater Management Plan.

5. NFA Groundwater Sites: The CAP on page 3-5 contemplates approving No Further Action (NFA) for groundwater sites with “slight” exceedences of Action Levels. The Navy needs to substantiate this statement. What site-specific criteria and rationale are to be met in order to allow NFA?

6. Ecological Risk Per SF Reuse Plan: The City’s proposed reuse for a portion of IR-07 is to install a wetland. Subsequent meetings between the Navy, City and Regional Board have identified that a “seasonal” wetland is appropriate for IR-07. The City cannot support any unacceptable restrictions (financial or geographical) placed on locating or constructing the IR-07 wetland because of existing contamination left in-place as a result of this Corrective Action Plan.

7. The Navy needs to identify all areas where TTPH in excess of the source criterion is to be left in place due to obstructions, e.g. utility corridor, or foundations.

On page 3-9 of the CAP it is stated that petroleum contamination that exceeds the soil source criterion and is also located under buildings and utility corridors will be left in place on condition that the City indicates the building(s) may not be disturbed. It is not clear how, or when the Navy will notify the City of their intent to leave petroleum contamination in place. The City requests the Navy to provide specific written notification identifying the building(s) below which petroleum contamination is intended to be left in place.

In Table 4-1, elevated TTPH concentrations in soil ranging between 4,800 to 10,200 ppm are identified in IR-06 below a utility corridor and therefore will not be removed. It is unclear to the City why the Navy is not removing the corridor to expose and excavate the petroleum contamination. What kind of utility corridor is it? Does the corridor house live or dead utilities? It is the City’s understanding that all utility corridors associated with fuel and steam lines on Parcel B have been removed, is this true? Please clarify why the Navy is not removing the petroleum contamination located under a utility corridor in IR-06.

8. The CAP states that petroleum groundwater plumes that originate on Parcel C and have migrated to Parcel B will not be addressed in the Parcel B CAP. The Navy needs to disclose all information about these sites, as well as other sites such as IR-18, where offsite petroleum contamination has been identified to determine whether these sites are contributing to onsite impacts. The Navy needs to explain how these sites will be investigated and remediated.

9. In Table 4-1 under the “Comment” column it is unclear what is meant by “Sample included from UST closure for investigation”. Does this mean that the Navy will excavate per Parcel B CAP? Or, has this sample and the surrounding contaminated soil been characterized and removed under the UST closure program? Please explain.

### **Petroleum Hydrocarbon Soil Sampling Plan Comments**

In general the SAP does not provide the level of detail necessary for a thorough review of the proposed scope of work. Within the introduction of the SAP, it should be made clear how this SAP fits into the overall schedule for the TPH Corrective Action. As is, this SAP is not a stand-alone document and relies too heavily on general references to the Petroleum CAP and the Parcel B Final Remedial Design documents. It is unclear how this document will adequately suffice as the field document by which a sampling team will rely upon for carrying out the confirmation sampling effort contemplated.

While brevity has its place, the lack of figures and the reliance on general references to other documents without identifying the page numbers or section headings of the referenced material makes the review overly cumbersome.

1) Introduction: As the SAP is read, it appears the purpose of the SAP is to confirm the concentrations of TTPH in soil where previous sampling indicated elevated TTPH concentrations. The introduction does not identify this SAP as a confirmation sampling effort.

2) TPH Soil Sampling Locations: It is unclear where the 12 locations identified for further investigation are located. The SAP cites 12 locations, Figure 4-1 identifies 11 soil source locations, and in the SAP text cites 5 locations where further investigation is required. It would be clearer if a figure was provided for each area identified as requiring further investigation.

Detailed figures corresponding to the sites listed in Table 1 would help clarify the sampling plan rationale. Somewhere, whether in Figures or not, it should be shown that each sample number listed in Table 1 has been bounded by other TTPH sample data. How is it to be determined whether the proposed sample locations represent the center of a TTPH contaminated area?

3) Sampling and Analytical Methods: The proposed confirmation sampling depths provide a vertical profile of the soil column at one location. How does the Navy intend to provide the same sample coverage horizontally. What assurance is there that the samples being collected to confirm elevated concentrations are representative of the area of existing contamination when it appears that only a vertical column is being characterized?

4) QA/QC: The appropriate QA/QC information, including detection limits, needs to be included in this SAP.

5) General: Since the Navy proposes natural attenuation in lieu of excavation at some sites, it is appropriate for the sampling to include analyses for in-situ soil constituents that indicate a subsurface soil environment conducive to natural attenuation processes.