



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH

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HUNTERS POINT
SSIC NO. 5090.3**

April 4, 2001

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

San Francisco Department of Public Health's Comments on Calculation and Implementation of Supplemental Manganese Ambient Levels dated February 28, 2001

Dear Mr. Mach:

On behalf of the San Francisco Redevelopment Agency, we have reviewed portions of the subject document and have the following comments. We appreciate the Navy's efforts in this area and the meeting that was held on March 22, 2001 to address technical concerns about this issue. Our understanding is that both the USEPA and the DTSC are concerned about the proposed supplemental manganese ambient level. Both Agencies are evaluating the Navy's statistics and calculations. We are relying on their expertise to develop a supplemental manganese ambient level that is protective of health and the environment and that will allow the City's reuse plan to move forward as required under CERCLA.

As a potential future property owner and the local government with responsibility for the health and welfare of San Francisco residents, our primary concern is with the potential adverse health effects caused by residual manganese contamination left at the site. Our understanding is that any manganese above the USEPA's 1,800 parts per million (ppm) residential preliminary remediation goal (PRG) may cause health effects, especially in children. If contamination is left above the 1,800 ppm level, what does this mean for future residents and visitors? Will it be healthy for residents to live and work in the areas with manganese concentrations above the PRG? Does the nature of the naturally occurring Chert-related manganese pose a lower health risk than manganese from an industrial operation? If the concentrations of naturally occurring manganese pose a potential health risk for unrestricted residential use, will use restrictions need to be placed on the property, in addition to the restrictions and notices now set forth in the Parcel B ROD?

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Another concern is how a determination will be made in the field as to whether Chert-related manganese or industrial-related manganese is present. The Decision Flow Chart (Figure 12) needs to carefully screen out industrial sources first. Once it is determined that an elevated manganese concentration is not associated with industrial activities, clear guidelines need to be established for when a sample needs to be excavated. If the Navy has one sample with a Chert-related elevated manganese concentration in a proposed excavation, will the entire excavation area, regardless of size, be left in place? How many samples over how large of an area will the agencies require in order to qualify as an "ambient" manganese area? Please provide more details on the implementation of a supplemental ambient level.

If you have any questions, please contact me at 415-252-3967.

Sincerely,



Amy Brownell, P.E.
Site Mitigation Engineer

cc:

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