



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

N00217.000508
HUNTERS POINT
SSIC NO. 5090.3

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Ser 06CH.RM/0845
August 23, 2001

Ms. Claire Trombadore (SFD 8-3)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Mr. Chein Kao
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Mr. Michael Rochette
California Regional Water Quality Control Board, San Francisco Bay Region
1515 Clay Street, #1400
Oakland, CA 94612

Dear BCT members:

The purpose of this letter is to document the Navy's successful completion of the Parcel B perimeter air monitoring program and outline the continued worker protection measures to be implemented for the remainder of the Parcel B remedial action on Hunters Point Shipyard. Based on the information below, the Navy will be de-mobilizing the perimeter air monitors from the site by September 2, 2001, and will continue to perform worker health and safety monitoring per the guidelines being implemented on the Parcel C and D removal action. Following is a summary of some background information, results to date, and future plans.

The requirements for Perimeter Air Monitoring on Parcel B are located in Appendix G, Perimeter Air Monitoring Plan (PAMP), of the Site Health and Safety Plan, Remedial Action for Parcel B, Hunters Point Shipyard, San Francisco, California, Revision 8, September 2000. They are also referenced in Section 01420, Air Monitoring, of the Final, Parcel B Remedial Design (RD) Document II, Technical Specifications/Drawings, Remedial Action, Hunters Point Shipyard, San Francisco, California, Revision 1, August 19, 1999. Section 1.0 of the PAMP states the "overall objective of the air monitoring portion of the project is to assist in protecting the safety and health of site employees and the nearby community by documenting concentrations of specific air contaminants and comparing them to specified levels." Section 01420 of the RD details the scope of the monitoring effort, and indicates general perimeter air monitoring locations in Section 3.6.C.

August 23, 2001

Since July 1998, there have been 364 sampling rounds of perimeter air monitoring spanning 27 months (July 1998 through June 2001) from 5 air monitoring stations, and 1 duplicate station on Parcel B, in accordance with the PAMP. Chemical of concern (COCs) with exceedences in Parcel B monitoring events include benzene, manganese, and bis(2-ethylhexyl)phthalate. Using supporting analytical data from upwind air monitoring stations, the benzene exceedences have been attributed to off-site sources. Phthalates are not a significant COC on Parcel B and are not associated with most of the excavations. The likely source of the bis(2 ethylhexyl)phthalate is in the sampling and laboratory plastic ware, and off-site sources.

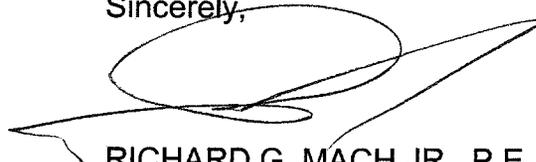
Manganese has been the primary driver for increased air monitoring in Parcel B. Airborne manganese concentrations exceeded the action level of 0.05 micrograms per cubic meter (ug/m³) 24-hour time weighted average (TWA) in 76 events at Parcel B. The current perimeter action level for manganese is overly conservative. After extensive review of the regulations and consulting with health protection specialists, use of the California Manganese Chronic Reference Exposure Level of 0.2 ug/m³ is the most appropriate screening criteria for this project. Use of the new action level is protective of the safety and health of site employees and the nearby community and results in no manganese exceedences over the history of the project.

Air monitoring costs for Parcel B have averaged \$60,000 per month, totaling \$2,000,000 to date. The cost of continued perimeter air monitoring through the completion of the remedial action would exceed \$200,000.

Based on the information presented above, the Navy has determined that the goals of the PAMP have been accomplished. Therefore, the perimeter air monitoring equipment will be demobilized by September 2, 2001, and the contractors have been directed to perform future worker health and safety air monitoring consistent with current soil excavation operations on Parcels C and D, as defined in Section 3.1.5, Air Monitoring, of General Work Plan, Excavation of Impacted Soil and Closure of Abandoned Steam and Fuel Pipelines, Hunters Point Shipyard, San Francisco, California, March 5, 2001.

Should you have any concerns with this matter, please contact me at (619) 532-0913.

Sincerely,



RICHARD G. MACH JR., P.E.
BRAC Environmental Coordinator
By direction of the Commander

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