



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

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HUNTERS POINT  
SSIC NO. 5090.3

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Ser 06CH.KF/0383  
January 24, 2003

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

Dear Mr. Kao:

Thank you for sharing the DTSC's preparation efforts for the upcoming Risk Management Review (RMR) meetings. The Navy would like to emphasize that the objective of the RMR meetings is to make risk management decisions that support the critical next step of "unifying cleanup with reuse" at Hunters Point Shipyard (HPS). The Navy envisions the RMR meetings will accomplish the following:

- Recognize that redevelopment blocks, and the risk grids that comprise them, represent common exposure areas around which risk management decisions should be framed
- Use cumulative risk to communicate current risk levels across the parcel, with current exposure values and assumptions (i.e., 2002 PRGs and residential/industrial exposure based on reuse assumptions)
- Ensure consistency with the City of San Francisco/Navy Conveyance Agreement
- Develop a management approach to ambient trace metals present at Parcel B
- Identify potential actions that may be applied in order to provide protectiveness required at each redevelopment block

In considering our objectives in the RMR, consider the following. The RMR risk assessment calculations take into account over 5,400 soil samples collected and analyzed at Parcel B. The cumulative risk calculations completed for the RMR indicate that in residential exposure areas:

- Approximately 70% of the exposure grids indicate an excess lifetime cancer risk (ELCR) in the range of  $1 \times 10^{-6}$  or less
- Approximately 26% are within the  $1 \times 10^{-5}$  range
- Less than 4% are above  $1 \times 10^{-4}$

Likewise, the cumulative risk calculations indicate that with respect to hazard indices in residential exposure areas:

- Approximately 79% of the values are less than 1.0
- Approximately 17% are less than 5.0
- Only 4% are above 5.0

All the exposure areas with an ELCR greater than  $1 \times 10^{-4}$  are located in the vicinity of the VOC plume at Building 123. Industrial exposure areas suggest a similar distribution, with approximately 67% of the exposure grids having an ELCR of  $1 \times 10^{-6}$  or less, and 33% greater than  $1 \times 10^{-6}$ . All of the hazard index values in industrial exposure areas are less than 1.0.

The Navy believes that the Remedial Design and RD Amendment adequately addressed the characterization of sites undergoing remedial actions; the agreed-upon step-out approach allowed the extent of chemicals of potential concern (COPCs) to be defined. While it is true that certain excavations were expanded slightly due to an additional COPC discovered during post-excavation sampling, such data also indicate that such discoveries did not result in finding additional sources not previously identified. Between July 1998 and February 2001, additional COPCs were discovered in 17 of 84 excavations in 1998/1999 and 9 of 43 excavations in 2000/2001. The most significant finding of these was that of Aroclor 1260 chlordane at excavation B3422. The incremental ELCR associated with the addition of Aroclor 1260 at this location was on the order of  $10^{-5}$ . Other instances would have resulted in incremental risk of  $10^{-6}$  or less. The Navy does not feel that the uncertainties posed by these discoveries would compromise the BCT's ability to make risk management decisions and set the path forward. The Navy will demonstrate that sufficient information is known about Parcel B to evaluate potential remedial actions.

A sample-by-sample, chemical-by-chemical evaluation at each site is not appropriate for making risk management decisions, especially given the overall low risk at Parcel B, and the straightforward remedial actions envisioned to achieve cleanup objectives. The Navy looks forward to DTSC's comments on the Construction Summary Report for the 78 excavations included therein. The Navy reviewed all 78 excavations to ensure that they met the requirements of the Remedial Design Amendment, even though the amendment approval process occurred over a period of several months (draft 5/16/00, draft final 6/29/00, draft final rev 1 9/7/00, final 2/20/01). Although the Navy recognizes that actions taken on the "manganese excavations" remain a point of contention, we hope that resolution of comments on the CSR will result in agreement as to the completeness of the actions taken on the 78 sites presented. Remaining excavations are subject to further review via the RMR process.

The Navy invites DTSC to participate in the RMR process as outlined in the attached documents. This process offers an effective solution to help identify potential remedial actions and will allow timely transfer of Parcel B to the City of San Francisco for reuse. Potential remedial actions will be evaluated in the RMR Summary Report, which will form the basis for a Proposed Plan and amended ROD.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Forman', with a long horizontal flourish extending to the right.

KEITH FORMAN  
BRAC Environmental Coordinator  
By direction of the Commander

Enclosures: Enclosure 1 Risk Management Review Process Flowchart  
Enclosure 2 Risk Management Decision Process for Soil, Parcel B,  
Hunters Point Shipyard

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QUESTIONS MAY BE DIRECTED TO:

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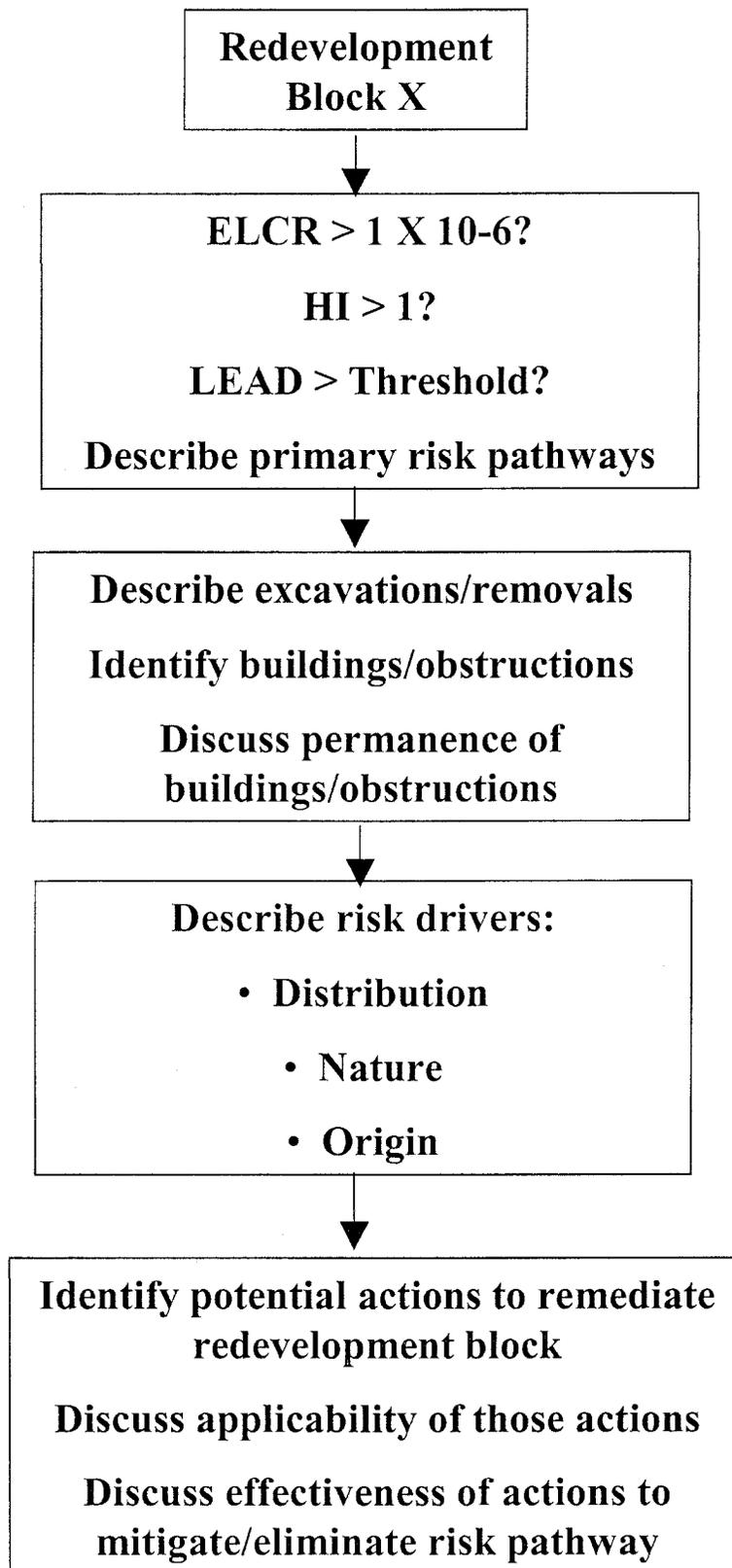
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Writer: P. Brooks, 06CH.GP, 2-0930

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# RISK MANAGEMENT REVIEW PROCESS



**Risk Management Decision Process for Soil  
Parcel B, Hunters Point Shipyard**

<b>Redevelopment Block Number (if a street right-of-way, describe location)</b>	<b>Risk Grid Cell Numbers and Risk/Reuse Scenario*</b>	<b>IR Site Number</b>
<b>Planned Reuse</b>	<b>ELCR Grid Value and Segregated HI Value</b>	<b>Remediation or De Minimis Area Number</b>

\* Risk scenario (residential/industrial) is consistent with planned reuse, and excludes chemicals detected at concentrations below established ambient levels. Total exposure scenario will be discussed, as appropriate, for risk communication, but will not be used to determine CERCLA actions.

**RISK ASSESSMENT**

Do the grid cells within the redevelopment block include an ELCR greater than $1 \times 10^{-6}$ , an HI greater than 1, or a lead concentration greater than 750 mg/kg (industrial scenario) or 150 mg/kg (residential scenario)?	
Identify primary risk pathways and their relative contribution to the total ELCR and/or HI.	

**SITE CONDITIONS**

<b>Previous Actions</b>	
Previous removal/remedial actions? If so, identify and describe action.	
<b>Buildings/Obstructions</b>	
Building or other obstruction near the excavation?	
Is this building/obstruction planned to remain post-development?	
<b>Risk Assessment</b>	
How are elevated "risk driver chemicals" bounded spatially?	
Are "risk driver chemicals" in soil also present in groundwater at concentrations that warrant further evaluation? Note: ecological and potable water pathways are <i>not</i> considered in this evaluation.	
Do the "risk driver chemicals" include metals with established ambient levels?	
Can the "risk driver chemicals" be considered the result of fill material, variability in ambient levels, or a spill/release? Explain.	
Is there sufficient information to evaluate remedial technologies/controls? Explain why or why not.	

**POTENTIAL ACTION REQUIRED**

<b>Describe potential actions and their applicability</b>	
· No Action	
· Removal (for example, excavation or SVE)	
· Treatment/Disposal (for example, off-site disposal or activated carbon treatment)	
· Institutional Controls (for example, deed restriction)	
· Engineering controls (for example, cap or cover)	

**NOTES:**

**Agreement** – The above findings document the discussion and conclusions from the risk management review process for the above referenced site. As indicated by the undersigned, all participants agree to the conclusions regarding the applicability of potential actions at the above referenced site.

**Keith Forman – Navy BRAC Environmental Coordinator**

Date:

**Claire Trombadore – EPA Remedial Project Manager**

Date:

**Chein Kao – DTSC Remedial Project Manager**

Date:

**Julie Menack – RWQCB Remedial Project Manager**

Date: