

**RESPONSES TO COMMENTS ON THE DRAFT RECORD OF DECISION FOR PARCEL UC-2,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA**

The table below contains the responses to comments received from the regulatory agencies on the “Draft Record of Decision for Parcel UC-2, Hunters Point Shipyard, San Francisco, California,” dated May 13, 2009. The comments addressed below were received from the U.S. Environmental Protection Agency (EPA), the California Department of Toxic Substances Control (DTSC), the California Department of Public Health (CDPH), the California Regional Water Quality Control Board (Water Board), and the San Francisco City and County Department of Public Health (city) during the period from June 19, 2009, through July 2, 2009. Throughout this table, *italicized* text represents additions to the document and ~~strikeout~~ text indicates deletions. Also throughout this table, references to page, section, table, and figure numbers pertain to the new document unless indicated otherwise.

No.	Page	Comment	Response
Responses to Comments from U.S. Environmental Protection Agency (Mark Ripperda, dated June 30, 2009, and received on July 1, 2009)			
GENERAL COMMENTS			
1.		<p>Section 2.2, Site Characteristics: The first sentence in this section provides two differing descriptions of the western portions of the parcel. Please fix this discrepancy, and also provide a description that is more in tune with current conditions, i.e., “The southern portion of the parcel is a roadway (with a small hillside running above it ** include this phrase only if the property boundary is at the top of the hill) and the northern portion is a triangularly shaped parking lot for Building 101. The parking lot is on the original promontory with native soil over shallow bedrock. The roadway was constructed by placing borrowed fill ...”.</p>	<p>The text in Section 2.2 has been revised as follows: The <i>northern and</i> western portions of Parcel UC-2 consist of the original promontory, with native soil over shallow bedrock, while the northern and western <i>eastern</i> portions of Parcel UC-2 consists of flat lowlands.</p> <p>The text in Section 2.1 has also been revised as follows: <i>Historical use of the southern portion of Parcel UC-2 is as a roadway (Fisher Avenue) and the northern portion is as a triangularly shaped parking lot (at the corner of Fisher Avenue and Robinson Street) for Building 101. The roadway was constructed by placing borrowed fill, and the parking lot is located on the original promontory with native soil over shallow bedrock. These features apply to most of the parcel, with a limited amount of property directly adjacent to them; there are no buildings. Along the western side of Fisher Avenue is a sharp rise of 5 to 15 feet that is vegetated with ice plant and annual grass.</i></p>
2.		<p>Table 3 seems redundant with Table 4. Also, why are there maximum detected concentrations listed for construction worker metals, when the footnote for residential says that no soil data were collected. Please fix this discrepancy and merge tables 3 and 4.</p>	<p>Tables 3 and 4 both list the remediation goals. In response to this comment, the remediation goals have been removed from Table 3.</p> <p>Although no soil data were collected within Parcel UC-2, some of the risk grids for the construction worker include the northern border of Parcel UC-2.</p>

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3.		<p>Section 2.3: The second to last paragraph of this section mentions states that VOCs from a portion of RU-C5 are in Parcel UC-2 groundwater. Since there is no subsequent section on nature and extent, please describe the VOCs here. Perhaps reference Table 4 for a list of the chemicals, and describe the latest round of sampling results available for this ROD and the sampling locations. Figure 6 shows a dot with a carbon tet concentration of 28 µg/l. Is this a monitoring well location and a recent result? We're all for streamlined RODs, but not to the extent that necessary information is not in the main body of the ROD. If the only data is from Parcel C, then explain that and show or describe the data and how it extrapolates into UC-1.</p>	<p>The text in Section 2.3 has been revised as follows: The only groundwater remedial unit (RU) at Parcel UC-2 is a portion of RU-C5 (Figure 6). The predominant chemicals present in Parcel UC-2 groundwater, based on this portion of RU-C5, are VOCs₍₁₁₎, specifically carbon tetrachloride. <i>The highest concentration of carbon tetrachloride that has been detected in groundwater samples from Parcel UC-2 is 28 µg/L in 1993 from a well located in the eastern portion of IR-06. In 2007 and 2008, detections of carbon tetrachloride in this area were between 1 and 5 µg/L. The estimated areal extent of carbon tetrachloride in groundwater at Parcel UC-2 and the well with the highest detection of carbon tetrachloride, are shown on Figure 6.</i></p>
4.		<p>Section 2.8.1: The first bullet uses present tense (is proposed) while the second bullet uses past tense (was proposed). Please be consistent and use present tense throughout the document for remedy proposals.</p>	<p>The text in Section 2.8.1 has been revised as follows:</p> <ul style="list-style-type: none"> • No excavation, off-site disposal, and SVE is proposed will not be required for Parcel UC-2 soil. • No in situ ZVI reduction and bioremediation was proposed will not be required for Parcel UC-2 groundwater.

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5.		<p>Section 2.8.1: This section states that no excavation or SVE is proposed for soil and that no in-situ ZVI reduction or bioremediation is proposed for Parcel UC-2 groundwater. Why weren't soil excavation, SVE and active groundwater treatment considered? Why include them in the alternatives evaluation after saying that they weren't considered? Please delete this sub-section and re-write the alternatives to include only appropriate content for this ROD and don't overly depend on or reference the Parcel C ROD. The new version for groundwater could include 1) No Action; 2) Long Term Monitoring and ICs; 3) Monitored Natural Attenuation and ICs; and 4) Active Treatment, Monitored Natural Attenuation and ICs. Then, the active treatment can be appropriately evaluated and you can have a proper justification for selecting Long Term Monitoring and ICs. Same thing for soils, SVE should be considered and not selected if not appropriate, rather than saying it was not proposed.</p>	<p>Parcel UC-2 was a small non-industrial area of the former Parcel C as evaluated in the feasibility Study, which was split into the current Parcels C and UC-2 at the proposed plan stage of the CERCLA process. Evaluation of risk, development of remedial action objectives, and evaluation of remedial alternatives as documented in the final feasibility study pertain to both the current Parcel C as well as Parcel UC-2; only a subset of the soil and groundwater remedy alternatives are applicable to the Parcel UC-2 portion of the former Parcel C. Many of the remedial actions in the preferred soil and groundwater alternatives (S-5 and GW-3B), including excavation, SVE, ZVI, and bioremediation, were not planned for the Parcel UC-2 portion of the former Parcel C and therefore are not applicable.</p> <p>Based on subsequent discussions between the Navy and Mr. Mark Ripperda of EPA, the Navy agreed to carry forward the full alternatives as developed in the FS and presented to the public in the proposed plan for Parcel UC-2 for consistency and completeness. Further clarification throughout the text of the ROD regarding the remedy elements which are or are not applicable to Parcel UC-2 has been made.</p> <p>For clarity, the following text was added to Sections 2.8 and 2.9.1:</p> <p><i>The Feasibility Study was conducted for the former Parcel C, which consisted of the current Parcels UC-2 and C. Parcel UC-2 was a small, non-industrial portion of the former Parcel C. The former Parcel C was subsequently split into the current Parcels C and UC-2 at the Proposed Plan stage of the CERCLA process. Evaluation of risk, development of remedial action objectives, and evaluation of remedial alternatives as documented in the final Feasibility Study pertain to both the current Parcel C as well as UC-2; as such, only a subset of the soil and groundwater remedy components evaluated in the FS are applicable to the Parcel UC-2 portion of the former Parcel C. Full description of the remedial alternatives as presented in the FS and Proposed Plan were retained for completeness and consistency. However, many of the remedy components in the soil and groundwater alternatives were not planned for the UC-2 portion of the former Parcel C and therefore are not applicable to Parcel UC-2.</i></p>

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5. (con't)			<p>The following text has been added to Section 2.9.1: <i>In the Parcel UC-2, many of the parcel-wide remedy components of the preferred soil and groundwater alternatives (S-5 and GW-3B) are not needed as described below:</i></p> <ul style="list-style-type: none"> • <i>Excavation: Parcel UC-2 does not meet the criteria for excavation. Excavation was planned only in areas with elevated concentrations of lead, mercury, zinc, and organic chemicals or arsenic where the concentrations significantly exceed the Hunters Point ambient level and are outside of concentration ranges for naturally occurring metals in the same geologic formations in the San Francisco area. Parcel UC-2 soil does not contain contaminants at levels that require excavation.</i> • <i>SVE: Parcel UC-2 does not meet the criteria for SVE. SVE was planned as a source reduction measure to address VOC-contaminated soil. The SVE areas were based on bounded soil sampling locations where VOCs were detected at concentrations above remediation goals and where soil characteristics are appropriate for SVE. Parcel UC-2 has lower-level VOC contamination and has not been identified as a source area.</i> • <i>ZVI: Parcel UC-2 does not meet the criteria for ZVI. Targeted ZVI was planned to treat only the most contaminated parts of the plumes, particularly chlorinated ethenes. As a result, the targeted ZVI treatment areas may be generally defined as areas where the concentrations of PCE and TCE in groundwater exceed 0.1 percent of the aqueous solubility of these chemicals, 15 µg/L for PCE and 110 µg/L for TCE. Parcel UC-2 groundwater contains lower levels of carbon tetrachloride, but not higher levels of chlorinated ethenes.</i> • <i>Bioremediation: Parcel UC-2 does not meet the criteria for bioremediation. Targeted bioremediation areas were based on the areas where select COCs in groundwater exceed the institutional control termination goal by a factor of 10 to 50, and ecological COCs exceed the trigger levels. Parcel UC-2 groundwater contains lower levels of carbon tetrachloride and does not exceed ecological COC trigger levels</i>

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6.		<p>Section 2.8.2: This section shares similar problems with Section 2.8.1. The alternatives comparison for both soil and groundwater compare against the alternatives selected in the Parcel C ROD. Please delete the comparisons to the Parcel C selected remedy throughout. Provide more details in each of the criteria evaluations on why the selected alternative is better than the other alternatives for this parcel. For example, the following comparison for groundwater currently under Reduction in Toxicity has two problems, a lack of real information and comparison, and it selects a remedy in the comparison: "Alternative GW-2 (monitoring and ICs) would not reduce the toxicity or volume of contaminants and would also monitor the mobility of the contamination through the groundwater monitoring program and eliminate exposure through the use of ICs. Even through Alternative GW-3B (active treatment) was selected for the former Parcel C, only monitoring and ICs will be implemented (Alternative GW-2) at Parcel UC-2." Section 2.8 should only have comparisons, the selection should wait until Section 2.9.</p>	<p>Please see the response to EPA (Ripperda) general comments 5. As suggested, discussion regarding the selection of the remedy has been removed from Section 2.8.2.</p>
7.		<p>Section 2.8.2: If the Navy feels it necessary to justify that the different remedies selected for Parcel UC-1 are different than the remedies selected for Parcel C, please provide that in a separate subsection.</p>	<p>Please see the response to EPA (Ripperda) general comment 5.</p>
8.		<p>Section 2.9.1: Why isn't MNA and ICs the selected groundwater remedy? The description for Long Term Monitoring says that it will continue until remedial goals are achieved. This sounds suspiciously like MNA. Because of the complete lack of data and evaluation in this draft, no evaluation can be made of the current concentrations or how long they might take to reach remedial goals.</p>	<p>Please see the responses to EPA (Ripperda) general comments 3 and 5. The selected alternative for groundwater (GW-3B) includes monitored natural attenuation (MNA), which includes long-term monitoring for the chemicals of concern (VOCs) as well as additional groundwater parameters to evaluate natural degradation conditions.</p>

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9.		<p>Sections 2.3, 2.8, and 2.9: This ROD provides little information on the relationship between the radiological Removal Action in the storm/sewer lines and the ROD. Please explain that the Removal Action is ongoing, provide some details on what is happening, and describe how the selected Radiological Alternative in the ROD is a safety net, to be implemented if the Removal Action is incomplete.</p>	<p>The text in Section 2.3 has been revised as follows: Storm drains and sewer lines in Parcel UC-2 are planned for survey and excavation in the spring of 2009. <i>The Navy decided to conduct a time-critical removal action (TCRA) to address potential radioactive contamination in storm drains, and sanitary sewers at Parcel UC-2. The TCRA at Parcel UC-2 involves (1) excavating radiologically impacted storm drain and sanitary sewer lines; and (2) screening, separating, and disposing of radioactively contaminated excavated materials at an off-site, low-level radioactive waste facility. Survey and removal of the Parcel UC-2 storm drain and sanitary sewer lines are currently under way and are expected to conclude in October 2009. The draft radiological survey unit report is planned for March 2010. Although the TCRA may not be completed by the time the ROD is signed, the TCRA is intended to achieve cleanup goals that are identical to the RAOs identified in this ROD. In the event that the TCRA does not achieve its cleanup goals, cleanup will continue in accordance with the remedial action selected in this ROD until the RAOs are achieved.</i></p>

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GENERAL COMMENTS			
1.		As noted the ROD needs to focus on the actions selected for contamination within this parcel rather than discussing the Parcel C actions. This is most obvious at page 35 where the Rationale for Selected Remedy (2.9.1) contains a very confusing description of the alternatives and the components needed for UC-2. The description of Alternatives should be tailored to address parcel specific threats and the components not required should be eliminated. If the list of alternatives is not revised, at least describe the selected alternative in terms of the alternatives evaluated. E.g. S-4 (not S-5) is the selected remedial action for soil.	Please see the response to EPA (Ripperda) general comment 5.
2.		Is the GW contamination which appears to extend into Parcel C addressed as part of another ROD for Parcel C or is this decision addressing the entire plume? It would be useful to know if the GW was moving from C to UC-2 or vice versa.	The text in Section 2.9.2 has been revised as follows: <i>Under the Parcel UC-2 ROD, Monitored natural attenuation will occur in and around the VOC plume area in both Parcels UC-2 and C (and also in downgradient locations) for the Parcel UC-2 groundwater remedy. The locations of monitoring points and the monitoring frequency will be specified in the RD. The monitoring plan will be flexible to allow modifications as data are collected.</i> Please also see the response to EPA (Ripperda) general comment 3.
3.		Section 2.5.2. The second paragraph is confusing and might well be eliminated. First it states that chemicals present on UC-2 were evaluated, but it concludes with the statement that no chemical were identified as CoC's. The middle sentence refers to a process for establishing trigger levels, but there seems to be a reversal of the process description. It appears that establishing trigger levels was a part of the evaluation process rather than the objective of the process. Why is this paragraph needed if there are no GW ecological CoCs within this parcel?	The text in Section 2.5.2 has been revised as follows: Chemicals present in the A-aquifer groundwater at Parcel UC-2 were evaluated to assess potential environmental impacts to the San Francisco Bay ⁽²²⁾ . This evaluation was completed as part of deriving trigger levels⁽²³⁾ for chemicals that present a potential impact to the San Francisco Bay. Based on the evaluation results, no chemicals were identified as <i>ecological</i> COCs in the A-aquifer at Parcel UC-2.
4.		There are two inconsistent references to the removal of storm sewer and sanitary sewer lines. Page 14 has the work completed last Spring (2009); Page 10 has that work being done in 2010.	Please see the response to EPA (Ripperda) general comment 9.

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5.		The distinction between work being conducted under the TCRA and the work (if any remains) to be conducted under the ROD needs to be established. The cost estimate and ARARs need to focus on the RA.	Please see the response to EPA (Ripperda) general comment 9. The remedial work, cost estimate, and applicable or relevant and appropriate requirements (ARAR) presented in the Parcel UC-2 ROD apply to Alternative R-2, not the radiological TCRA.
6.		Page 37. Add the phrase "and EPA, as a third party beneficiary," after DTSC in the next to the last sentence.	The text was revised as suggested in this comment. The text now states the following on page 37: The "Covenant(s) to Restrict Use of Property" will incorporate the land use restrictions into environmental restrictive covenants that run with the land and that are enforceable by DTSC, <i>and EPA, as a third-party beneficiary</i> , against future transferees and users.
7.		Page 39. Where do the VOC restrictions apply?	The text in Section 2.9.2 has been revised as follows: Initially, the ARIC will include <i>Redevelopment Block 10</i> within all of Parcel UC-2. <i>The remaining areas of Parcel UC-2 are planned roads, with the exception of a small sliver of Redevelopment Block 17. This portion of Redevelopment Block 17 consists of a hillside with sharp rise in elevation of approximately 5 to 15 feet to the west which is topographically separated from the VOC contamination found in Redevelopment Block 10.</i> The ARIC for VOC vapors in <i>Redevelopment Block 10</i> in Parcel UC-2 may be modified by the FFA signatories as the soil contamination areas and groundwater contaminant plumes that are producing unacceptable vapor inhalation risks are reduced over time or in response to further soil, vapor, and groundwater sampling and analysis for VOCs that establishes that areas now included in the ARIC for VOC vapors do not pose unacceptable potential exposure risk to VOC vapors.
8.		Review the GW ARARs in light of the selected remedy -- which should be retained?	The Navy has already reviewed the groundwater ARARs in this ROD and believes all of the ARARs, as listed, should be retained.
9.		Page 1-20. Comment section needs to be rewritten since ICs are being selected not just evaluated.	The associated text on Page 1-20, has been revised as follows: The Navy is <i>evaluating</i> selecting ICs for soil and groundwater in this ROD.

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GENERAL COMMENTS			
1.		Section 1.1. Selected Remedy Paragraph one, sentence two. Please clarify the text to state “radionuclides in <u>soil and structure associated with storm drains</u> ”.	The text in Section 1.1 was revised to read: The selected remedial action for Parcel UC-2 addresses metals in soil and radionuclides in <i>soil and structures associated with storm drains</i> and sewer lines.
2.		Section 2.2. Site Characteristics. Paragraph two. The information provided with regards to hydrostratigraphic units at Parcel UC-2 is limited and should be expanded to include the approximate depth to the A-aquifer groundwater, as well as a description and approximate depth to the B-aquifer groundwater, if it exists below ground surface at Parcel UC-2.	The text in Section 2.2 has been revised to read: The hydrostratigraphic units ⁽⁴⁾ present at Parcel UC-2 include the shallow A-aquifer and an upper bedrock water-bearing zone. <i>The B-aquifer is not present at Parcel UC-2. The shallow A-aquifer at Parcel UC-2 exists primarily within the shallow bedrock. The A-aquifer at Parcel UC-2 is expected to occur between 17.5 feet above mean sea level (msl) at the northern end of the parcel, down to 2 feet above msl at the southern end of the parcel. These groundwater elevations are largely inferred from wells surrounding Parcel UC-2 and the topography of the area.</i> In addition, two figures that address the A-aquifer and B-aquifer, respectively, have been added to the hydrostratigraphic units ⁽⁴⁾ reference.
3.		Table 1. Previous Investigations and Removal Actions, Page 13, Groundwater Data Gaps Investigation (2002-2008). Please revise the text to specify which monitoring well installed and monitored as a part of this investigation are located within Parcel UC-2.	The following text has been added to this section of Table 1: <i>Specifically, Parcel UC-2 monitoring wells IR06MW54F, IR06MW55F, IR06MW57F, and IR06MW58F were monitored as part of this investigation.</i>

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4.		Section 2.3. Previous Investigations. Paragraph two. Please clarify in the text that while no soil samples have been collected within Parcel UC-2, metals are expected to be elevated based on the available quarried bedrock fill information and soil data collected from within Parcel C.	The text in Section 2.3 has been revised to read: The predominant chemicals in Parcel UC-2 soil are metals ₍₁₀₎ . <i>Although no soil samples were collected within Parcel UC-2, the final Parcel C FS concluded that based on soil data collected within Parcel C, elevated concentrations of metals such as arsenic, manganese, and nickel are expected for fill material derived from quarried bedrock that was used may be related to the bedrock fill quarried to build the shipyard in the 1940s. Therefore, the Navy has worked with the regulatory agencies to identify remedial alternatives that address metals in soil, regardless of their source. The final Parcel C FS also recommended that the cover alternative would be applied parcel-wide because of the ubiquity of metals at concentrations exceeding remediation goals at Parcel C.</i>
5.		Section 2.5.1. Human Health Risk Assessment. Paragraph five. Please briefly clarify and define what an RME grid is.	The term "RME grids" was replaced by "risk grids." The following text has been added to Section 2.5.1: <i>To assess risk, the Base Realignment and Closure Cleanup Team (BCT) agreed to divide all of HPS into two types of exposure areas (residential and industrial grids) as a method of statistically calculating risk within an area for various future land use scenarios based on RME. The final FS used these exposure areas and the redevelopment blocks as the basis for evaluating the results of the HHRA and developing remedial alternatives to address potential unacceptable risk present at Parcel UC-2.</i>
6.		Table 2. Cancer Risks and Noncancer Hazards. (a) The need for specifying the redevelopment block is unclear and consideration should be given for removal of this column from the table.	As described in the response to DTSC general comment 5, the HHRA process at HPS divided sampled areas into grids of specific size to evaluate risk under residential and industrial scenarios. Because the final FS also used the redevelopment blocks as the basis for developing remedial alternatives, the HHRA also provided an overall assessment of risk by redevelopment block (SulTech 2008). The ROD was not changed as a result of this comment.

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6. (con't)		(b) An estimate of the risks associated with metals such as arsenic and manganese should also be presented in the table for the residential exposure scenario based on the metals concentrations associated with the quarried bedrock fill.	<p>The following information has been added to the text of Section 2.5.1: <i>At ambient concentrations (that is, HPALs), some metals at HPS are associated with cancer risks in excess of 10^{-6} and noncancer hazards in excess of 1.0. For example, the cancer risk associated with residential exposure to arsenic at a concentration equal to the HPAL for arsenic (11.1 mg/kg) is 2.9×10^{-4}. The HI associated with residential exposure to manganese at a concentration equal to the HPAL for manganese (1,431 mg/kg) is 1.7. Collectively, all metals at ambient levels contribute to a cancer risk of 3×10^{-4} for a resident and of 3×10^{-3} for industrial workers and recreators. For noncancer hazards, metals at ambient levels collectively contribute to an HI of 11 for residents, 0.2 for industrial workers, and 0.7 for recreators.</i></p> <p>This information was not added to Table 2. Table 2 presents risks evaluated on the basis of site data, and as calculated and presented in the final Parcel C FS (SulTech 2008).</p>
7.		<p>Table 3. Chemicals of Concern in Soil and Groundwater Requiring a Response Action. (a) Please explain why radionuclides are not presented in the table.</p> <p>(b) It is unclear why the remediation goals for each Chemical of Concern are presented here (as they are also presented later in Tables 4 and 5) and consideration should be given for their removal.</p>	<p>Chemicals and radionuclides are separate sets of compounds that require respectively different response actions. A table was prepared for the nonradiological chemicals that require a response action because site data support the response action decision. In the case of radionuclides, the response action decision was based on an overall assessment of the storm drains and sanitary sewers, and thus there are no site data to present.</p> <p>This format was used in the prior streamlined HPS RODs, including the final Parcel G ROD (Navy 2009a) and the draft final Parcels D-1 and UC-1 ROD (Navy 2009b). The ROD was not changed as a result of this comment.</p> <p>The remediation goals were removed from Table 3 as suggested.</p>

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8.		<p>Section 2.7. Remedial Action Objectives (RAOs).</p> <p>(a) Soil RAOs subsection, 2nd RAO. The text should be corrected to state "... soil gas surveys that <u>will</u> be conducted in the future." Soil gas surveys will be required in order to determine if VOCs in soil gas do not pose an unacceptable risk via indoor inhalation of vapors. In addition, this change provides consistency with the description of the selected remedy as presented in Section 2.9.2.</p> <p>(b) Radiologically Impacted Soil and Structures RAOs subsection. Please specify the "potentially complete exposure pathways" for radiologically impacted soil and structures in the text.</p> <p>(c) A brief discussion on the remediation goals associated with "Equipment Waste" and how they will be applied should be presented in the text.</p>	<p>Because Parcel UC-2 has lower-level VOC contamination in a limited area, it is reasonable to assume that the groundwater contaminant plume that is producing unacceptable vapor inhalation risks will reduce over time and a soil gas survey may not be needed. Please also see the response to EPA (Carr) general comment 7.</p> <p>The text in Section 2.9.2 has been revised as follows: A soil gas survey willmay be conducted for the following purposes:</p> <p>The text in Section 2.7 has been revised to read: Prevent or minimize exposure to radionuclides of concern and in concentrations that exceed remediation goals for all potentially complete exposure pathways (<i>for example, external radiation, soil ingestion, and inhalation of resuspended radionuclides in soil or dust</i>).</p> <p>This category was incorrectly listed; the category has been revised to read "Equipment and Waste."</p>
9.		<p>Table 5. Remediation Goals for Radionuclides. A brief definition of Equipment Waste should be added as a table footnote.</p>	<p>Please see the response to DTSC (Miya) general comment 8 (c).</p>
10.		<p>Section 2.8.1. Description of Remedial Alternatives.</p> <p>(a) First Bullet. The text should be clarified to explain that excavation and offsite disposal of soils impacted with radionuclides associated with the storm drain and sewer line removal will occur.</p> <p>(b) The justification for excluding in situ ZVI reduction or bioremediation for the RU-C5 VOC plume must be presented.</p>	<p>The following text has been added to the end of Section 2.8.1: <i>Please note that although excavation and off-site disposal of soil will not be implemented for nonradiological chemicals of concern, excavation and off-site disposal of soil will be implemented for radionuclides of concern.</i></p> <p>Please see the response to EPA (Ripperda) general comment 5.</p>

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Responses to Comments from California Department of Toxic Substances Control (DTSC) (Ryan Miya, dated and received July 1, 2009) (Continued)			
11.		<p>Section 2.8.2. Comparative Analysis of Alternatives.</p> <p>(a) Threshold Criteria, Compliance with ARARs subsection. It is unclear how the ARARs do not apply to the no-action alternatives and consideration should be given to change the information presented in Table 7 in the Compliance with ARARs row from "Not Applicable" to "No."</p> <p>(b) Primary Balancing Criteria, Reduction in Toxicity, Mobility, or Volume through Treatment subsection. The text states that alternatives GW-3B and GW-4 are rated the highest "because they both reduce the toxicity and volume of contaminants by <u>active treatment of VOCs and metals</u>, and that alternative GW-3A would also reduce the toxicity and volume of contaminants <u>through treatment</u>. However, in situ ZVI reduction and bioremediation have been excluded from the Parcel UC-2 remedies. The text and relative rankings should therefore be revised accordingly to adequately evaluate the proposed Parcel UC-2 remedies.</p>	<p>There is no need to identify ARARs for the no-action alternative because ARARs apply to "any removal or remedial action conducted entirely on site" and "no action" is not a removal or remedial action. CERCLA § 121 (42 U.S.C. § 9621) cleanup standards for selection of a Superfund remedy, including the requirement to meet ARARs, are not triggered by the no-action alternative. Therefore, a discussion of compliance with ARARs is not appropriate for the no-action alternative.</p> <p>The language "Not Applicable" also comes directly from the final Parcel C FS (SulTech 2008). The ROD was not changed as a result of this comment.</p> <p>Please see the response to EPA (Ripperda) general comment 5.</p>
12.		<p>Table 6. Remedial Alternatives. The basis for the percentages of the original costs for the former parcel (Parcel C) is not clearly presented and should be included. Updated Present Worth Cost Tables, which were likely used to generate the estimates provided in the Draft ROD, should be included.</p>	<p>The following note was added to Table 6:</p> <p><i>Parcel UC-2 represents a small percentage of the original Parcel C acreage (approximately 3 percent) and only a limited set of soil and groundwater response actions applicable at Parcel C are applicable at Parcel UC-2 (ICs, covers, and monitored natural attenuation). Based on this understanding, the Parcel UC-2 costs for Alternatives S-2, S-4, and GW-2 were evaluated in detail and were found to be 16, 3, and 4 percent, respectively, of the overall Parcel C costs. The adjusted Parcel UC-2 Alternative S-2 costs were used to adjust the Alternative S-3 costs, and the adjusted Parcel UC-2 Alternative S-4 costs were used to adjust the Alternative S-5 costs. The adjusted Parcel UC-2 Alternative GW-2 costs were used to adjust the costs for Alternatives GW-3A, GW-3B, and GW-4. These adjusted Parcel UC-2 costs were compared to the original Parcel C cost for each of these alternatives, and a percentage was calculated.</i></p>

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13.		Table 7. Relative Ranking of Remedial Alternatives. The rankings should be revised / updated to take into consideration those portions of the Parcel UC-2 remedies that have been removed and are not applicable for the current evaluation.	Please see the response to EPA (Ripperda) general comment 5.
14.		<p>Section 2.9.2. Description of the Selected Remedy.</p> <p>(a) Paragraph one. Inspection and maintenance requirements for the durable covers shall be specified in the remedial design.</p> <p>(b) Paragraph three. Additional details regarding the soil gas survey (sampling locations, analyses, methods used to identify Contaminants of Concern, etc.) shall be presented in the remedial design.</p> <p>(c) Page 38, paragraph one. Last sentence. Please add procedures for any necessary inspections in the list of items identified in the RMP and/or LUC RD.</p>	<p>The text in Section 2.9.2, paragraph one, has been revised to read: Durable covers will be applied as physical barriers for the Parcel UC-2 soil remedy to cut off potential exposure to metals in soil. <i>Inspection and maintenance requirements for the durable covers will be specified in the remedial design.</i></p> <p>This paragraph lists the purposes of a soil gas survey and therefore adding this information would be inconsistent. The current text is consistent with prior streamlined HPS RODs, including the final Parcel G ROD (Navy 2009a) and the draft final Parcels D-1 and UC-1 ROD (Navy 2009b). The ROD was not changed as a result of this comment.</p> <p>The text on page 38, paragraph one, has been revised to read: The Parcel UC-2 LUC RD shall identify the roles of local, state, and federal governments in administering the Parcel UC-2 LUC RD, and shall include, but not be limited to, procedures for any necessary <i>inspections</i>, sampling and analysis requirements, worker health and safety requirements, and any necessary site-specific construction or use approvals that may be required</p>
Responses to Comments from DTSC, Office of Legal Affairs (Ryan Miya, dated and received July 2, 2009)			
GENERAL COMMENTS			
1.		Page 1, 2nd paragraph. The acronym "EPA" should be deleted and replaced with DTSC where it refers to the state of California's Environmental Protection Agency. The "EPA" acronym was already established to mean "U.S. Environmental Protection Agency."	The acronym has been revised as follows: California EPA <i>Environmental Protection Agency's</i> Department of Toxic Substances Control (DTSC)

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Responses to Comments from DTSC, Office of Legal Affairs (Ryan Miya, dated and received July 2, 2009) (Continued)			
2.		<p>Pages 33-35. The purpose is unclear for selecting Alternatives S-5 and GW-3B for soil and groundwater, respectively, and then stating that specific alternative components are not applicable to Parcel UC-2. Please explain why Alternatives S-4 and GW-2 were not selected since they contain all the retained components selected from Alternatives S-5 and GW-3B. The Draft ROD is an independent document and expressly excludes Parcel C. Therefore, the current presentation creates unnecessary confusion.</p>	<p>Please see the response to EPA (Ripperda) general comments 5.</p>
Responses to Comments from the Water Board (Erich Simon, dated and received June 19, 2009)			
SPECIFIC COMMENTS			
1.	8	<p>Figure 3 – Reuse Areas and Associated Redevelopment Blocks – While this figure shows redevelopment blocks 10 and 17 and their associated anticipated reuse category, a significant portion of the parcel is not assigned to a redevelopment block or reuse category. Please indicate what the planned reuse is for the unlabeled areas in this figure.</p>	<p>Figure 3 has been revised; however, unlabelled areas remain in Parcel UC-2. The reuse plan identifies these unlabelled areas as future roads..</p>
2.	10	<p>Section 2.2 – Last Sentence – This sentence indicates that storm drain and sanitary sewer lines beneath the parcel are scheduled to be removed in 2010, whereas the last sentence of Section 2.3 on Page 14 indicates they are planned for removal in the spring of 2009. Please resolve.</p>	<p>The schedule information in Section 2.2 is incorrect and has been revised to read: <i>These lines, however, are scheduled to be removed in 2010. Survey and removal of the Parcel UC-2 storm drain and sanitary sewer lines are currently under way and are expected to conclude in October 2009. The draft radiological survey unit report is planned for March 2010.</i></p>

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Responses to Comments from the Water Board (Erich Simon, dated and received June 19, 2009) (Continued)			
2 (con't)			<p>The schedule information in Section 2.3 is outdated and has been revised to read: <i>Storm drains and sewer lines in Parcel UC-2 are planned for survey and excavation in the spring of 2009. The Navy decided to conduct a time-critical removal action (TCRA) to address potential radioactive contamination in storm drains, and sanitary sewers at Parcel UC-2. The TCRA at Parcel UC-2 involves (1) excavating radiologically impacted storm drain and sanitary sewer lines; and (2) screening, separating, and disposing of radioactively contaminated excavated materials at an off-site, low-level radioactive waste facility. Survey and removal of the Parcel UC-2 storm drain and sanitary sewer lines are currently under way and are expected to conclude in October 2009. The draft radiological survey unit report is planned for March 2010.</i></p>
3.	17	<p>Section 2.5 – Summary of Site Risks – Risk assessment results presented in this section pertain to the two redevelopment blocks located in this parcel. Please also indicate whether potential risks were evaluated in those areas not labeled as redevelopment blocks in Figure 3.</p>	<p>Parcel UC-2 consists primarily of a road (portion of Fisher Avenue), a parking lot (at the corner of Fisher Avenue and Robinson Street), and a limited amount of property directly adjacent to these features; there are no structures. As Parcel UC-2 moved through the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process, it was evaluated for potential releases, and no soil sampling was required in this area.</p> <p>The following text has also been added to Section 2.5.1: <i>At ambient concentrations (that is, HPALs), some metals at HPS are associated with cancer risks in excess of 10^{-6} and noncancer hazards in excess of 1.0. For example, the cancer risk associated with residential exposure to arsenic at a concentration equal to the HPAL for arsenic (11.1 mg/kg) is 2.9×10^{-4}. The HI associated with residential exposure to manganese at a concentration equal to the HPAL for manganese (1,431 mg/kg) is 1.7. Collectively, all metals at ambient levels contribute to a cancer risk of 3×10^{-4} for a resident and of 3×10^{-5} for industrial workers and recreators. For noncancer hazards, metals at ambient levels collectively contribute to an HI of 11 for residents, 0.2 for industrial workers, and 0.7 for recreators.</i></p>

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Responses to Comments from the Water Board (Erich Simon, dated and received June 19, 2009) (Continued)			
4.	22	<p>Figure 9 – Planned Surface Covers for the Soil Remedy – This figure indicates that the planned surface cover for the entire portion of the parcel along Fischer street will be repaired asphalt, whereas Figure 2 shows that the vegetated slope along the northwestern edge of Fischer Ave is included in the parcel. Please resolve this discrepancy.</p>	<p>Figure 9 accurately presents the cover remedy described in the final Parcel C feasibility study (FS) (Sultech 2008). The Navy conducted a site visit on June 30, 2009 to confirm current site conditions. Based on this visit, the Navy refined the planned covers for Parcel UC-2 as follows:</p> <p>1) The area to the southwest of the corner of Robinson Street and Fisher Avenue is a level, paved parking lot. From the parking lot down to Fisher Avenue is a sharp drop varying from 5 to 15 feet and the slope is vegetated with ice plant and annual grass. The parking lot is currently identified for a soil cover remedy; however, based on the current condition the Navy recommends reclassifying the parking lot plus the small amount of property to the north and west of the lot for pavement cover and specifying this area based on the aerial photo shown in Figure 2. The remainder of the area will remain soil cover, as planned.</p> <p>2) Along the western former Parcel A and Parcel UC-2 boundary, there is a sharp drop of about 15 feet from Parcel A down to Parcel UC-2 that continues along Fisher Avenue to the corner of Robinson Street. This slope is vegetated with ice plant and annual grass, and includes a set of concrete stairs leading up to former Parcel A. This area is currently identified for a pavement cover, but implementing that remedy on a slope would be difficult. As suggested by other commenters, the Navy recommends reclassifying this area for a soil cover remedy.</p> <p>Details of the design for covers at Parcel UC-2 will be developed in the remedial design. Figure 9 and Section 2.9.2 were revised to reflect these recommendations.</p>
5.	26	<p>Table 4 – Remediation Goals for Soil and Groundwater – Please include remediation goals for all constituents of concern detected in soil and groundwater, including associated degradation by-products.</p>	<p>The remediation goals presented in Table 4 are applicable to Parcel UC-2 chemicals of concern in soil and groundwater that were developed and finalized in the final Parcel C FS dated July 31, 2008. Carbon tetrachloride is the primary chemical of concern in groundwater; volatile organic compounds (VOC) are not chemicals of concern in soil. Chloroform – a primary degradation by-product of carbon tetrachloride – has been detected in the groundwater, and a remediation goal for chloroform was provided. Methylene chloride can also be a degradation by-product of carbon tetrachloride, depending on the degradation pathway; however, because it has not been detected in area groundwater, a remediation goal for methylene chloride or other VOCs not detected at Parcel UC-2 were not included.</p>

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6.	36	Section 2.9.2 – Description of Selected Remedy – Considering that the RU-C5 plume exists in both Parcel C and Parcel UC-2, more justification is needed for why the in-situ bioremediation and ZVI reduction components described in the Parcel C Feasibility Study and Proposed Plan are not applicable in Parcel UC-2.	Please see the response to EPA (Ripperda) general comment 5. In response to this comment, similar language was added to Section 2.9.1.
7.	36	Section 2.9.2 – Description of Selected Remedy – Where describing the removal and off site disposal of radiologically impacted storm drains and sanitary sewers, please also indicate that dust mitigation measures would be implemented.	The associated text in Section 2.9.2 has been amended to read: The selected remedy for radiologically impacted soil and structures consists of removing and disposing of off site the remaining radiologically impacted storm drains and sanitary sewers <i>while implementing appropriate dust control measures</i> ⁽³⁹⁾ to meet the objective of unrestricted release throughout Parcel UC-2.
Responses to Comments from California Department of Public Health (CDPH), (Larry Morgan, dated June 30, 2009 and received July 2, 2009)			
SPECIFIC COMMENTS			
1.		Page 2, first paragraph, last sentence. Please clearly state here that the radiologically impacted soil is only due to radiological contamination in the storm drains and sanitary sewer lines.	This text in Section 1.1 has been revised to read: Implementation of the remedy at Parcel UC-2 will consist of durable covers and institutional controls (IC) to address soil contamination; monitored natural attenuation and ICs to address groundwater contamination; and removal of storm drains and sanitary sewer lines and excavation of soil to address radiologically impacted soil and structures (storm drains and sanitary sewers) <i>and soil associated with these structures.</i> This change has been implemented throughout the ROD.
2.		Page 5, third paragraph. Please add here description of radiologically related activities associated specifically with Parcel USC-2.	The following text has been added to Section 2.1: <i>The storm drains and sanitary sewers in Parcel UC-2 are considered radiologically impacted because operations at HPS resulted in the disposal of radioactive materials through these systems. These wastes included materials from ship and personnel decontamination, fallout samples, and radioactive materials from refurbishment of radioluminescent devices, including radium-bearing paint.</i>

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Responses to Comments from California Department of Public Health (CDPH), (Larry Morgan, dated June 30, 2009 and received July 2, 2009) (Continued)			
3.		Page 5, fourth paragraph, last sentence. Please add here a sentence explaining the reasoning for dividing the former Parcel C into Parcels UC-2 and C.	The following text has been added to Section 2.1: <i>Parcel UC-2 was split from the former Parcel C because transfer of this property provides access to Fisher Avenue and the nearby utility corridor for redevelopment.</i>
4.		Page 5, fourth paragraph, last sentence. Please add a sentence here describing the nature of contamination associated with site IR-06.	The following text has been added to Section 2.1: <i>The IR-06 plume that crosses into Parcel UC-2 primarily contains low-level carbon tetrachloride; carbon tetrachloride has not been consistently detected in any other area of IR-06 and does not have an identified source.</i>
5.		Page 8, Figure 3. Please explain why Block 17 extends beyond Parcel UC-2 boundary into non-Navy property.	Figure 3 accurately represents the Block 17 boundaries that extend into the former Parcel A. Parcel A has been formally transferred from the Navy to the City and County of San Francisco and is therefore non-Navy property.
6.		Page 10, last paragraph. Please clearly state here that the radiologically impacted soil is only due to radiological contamination associated with the storm drains and sanitary sewer lines.	Please see the response to CDPH specific comment 1.
7.		Page 14, third paragraph. Please clearly state here that the radiologically impacted soil is only due to radiological contamination associated with the storm drains and sanitary sewer lines.	Please see the response to CDPH specific comment 1.
8.		Page 14, last paragraph, first sentence. "The reuse.....residential". It appears that the Navy used residential exposure scenario for the evaluation of dose and risk associated with the Blocks 10 and 17. Please clarify here.	There are multiple reuses in Parcel UC-2; however, only one exposure scenario was required to evaluate the risk. The cited text was revised as follows: The Parcel UC-2 reuses ₍₁₃₎ (<i>mixed-use and research and development</i>) specified in the San Francisco Redevelopment Agency's 1997 reuse plan were evaluated for the following exposure scenarios: residential exposure scenario (mixed-use and research and development).
9.		Page 19, Table 2. Please present the cancer risk associated with Block 17 due to the presence of radiologically impacted sewer lines and storm drains in the table.	The risk information for Block 17 has been added to Table 2.

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Responses to Comments from California Department of Public Health (CDPH), (Larry Morgan, dated June 30, 2009 and received July 2, 2009) (Continued)			
10.		Page 20, last paragraph. Please clearly state here that the radiologically impacted soil is associated with the storm drains and sanitary sewer lines.	Please see the response to CDPH specific comment 1.
11.		If the Navy is requesting an unrestricted release from the State of CA, the "site release criteria" will need to show that removal actions cleaned the site to as low as reasonably achievable (ALARA). Any averaged residual contamination concentrations when modeled should meet the ALARA requirements.	The Navy currently intends to seek radiological unrestricted release for Parcel UC-2. The efforts to investigate or remediate will be detailed in the final status survey report and are intended to meet the ALARA principle, which includes achieving the lowest reasonably achievable result considering available technology and financial assets. The report will also include dose and risk modeling, based on the results of the final status survey that will serve to demonstrate compliance with ALARA. The ROD was not changed as a result of this comment.
12.		Page 26, Table 5. Please remove foot note d as only the residential goals are provided in the table.	Regulatory comments on prior RODs have requested this footnote even though agreements at HPS require residential remediation goals for radionuclides in soil in all cases. The ROD was not changed as a result of this comment.
13.		Page 26, Table 5. Please change the title of the table to "Residential Remedial Goals for Radionuclides."	The term residential remedial goal specifically applies to soil. The ROD was not changed as a result of this comment.
14.		Attachment 1. Please include 17 California Code of Regulations Section 30256 as an ARAR. The California Department of Public Health (CDPH) believes that 17 California Code of Regulations (CCR) Section 30256 meets the criteria for a potential state chemical-specific ARAR and therefore should be included in the list of ARARs for this parcel. The Navy has previously indicated that 17 CCR Section 30256 cannot be an ARAR as it is primarily procedural in nature. However, this regulation is also substantive, at least in part. In particular, subdivision (k) does provide a standard for clean up of radioactive material. The text of 17 CCR 30256(k) is as follows: "(k) Specific licenses shall be terminated by written notice to the licensee when the Department determines that:	<u><i>The State Regulation is not Applicable.</i></u> A promulgated state requirement must be either "applicable" or "relevant and appropriate" in order to qualify as a state ARAR under CERCLA and the NCP. The Navy and EPA assert that the provisions of <i>California Code of Regulations</i> tit. 17 § 30256(k) are not "applicable" requirements because these regulations by their express terms apply to facilities licensed by the State of California that are undergoing a license termination process. The remediation of Parcel UC-2 under CERCLA is not part of a decommissioning or license termination procedure nor has any state license ever been issued because California laws and regulations regarding possession of radioactive materials do not apply to land possessed by the federal government.

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14. (con't)		<p>(10 Radioactive material has been properly disposed; (2) Reasonable effort has been made to eliminate residual radioactive contamination, if present; and (3) A radiation survey has been performed which demonstrates that the premises are suitable for release for unrestricted use; or other information submitted by the licensee is sufficient to demonstrate that the premises are suitable for release for unrestricted use.” The regulation may be more stringent than any other radiologic-specific ARAR.</p> <p>In addition, while the title of the regulation is “Vacating Installations: Records and Notices,” the regulation meets the criteria of “relevant and appropriate.” The Department is aware that the regulation does not provide a numerical standard; however, a state regulation need not contain a numerical standard in order to be considered an ARAR. Furthermore, the CDPH has been ordered to use that regulation by a California judge who held that the “the standard in California for decommissioning and termination of licenses for radioactive sites is found in 17 CCR section 30256...” (Committee to Bridge the Gap v. Bonta et. al, Sacramento County Superior Court, Case No O1CS01445, “Order Requiring Supplemental Return to Amended Peremptory Writ”, August 27, 2002.)</p>	<p><u>The State Regulation is not Relevant and Appropriate.</u></p> <p>The Navy and EPA also assert that the provisions of this regulation are not “relevant and appropriate” because standards for decommissioning a licensed facility are not appropriate for this remedy because they do not address a set of circumstances similar to the remediation of Parcel UC-2. The license termination standards are based on a detailed set of requirements for the management of licensed radiological material that were never applied to activities or facilities similar to HPS.</p> <p><u>The State Regulation is not More Stringent than Federal ARARs or Risk-based Cleanup Levels.</u></p> <p>To qualify as a state ARAR under CERCLA and the NCP, a state regulation must be more stringent than federal laws and regulations. See 40 CFR §§ 300.400(g)(4) and 300.515(h)(2). The state is responsible for identifying potential state ARARs that it believes are more stringent than federal ARARs or risk-based cleanup levels and for demonstrating why they are more stringent. The remedy for Parcel UC-2 is based on a risk-based approach and the state has not demonstrated that the standards under § 30256(k) would be more stringent.</p> <p>The State has asserted that the phrase “eliminate residual radioactive contamination” in §30256(k)(2) established a more stringent standard because CERCLA does not require the elimination of residual radioactive contamination. The suggestion ignores the actual language of the regulation which requires only “reasonable effort to eliminate residual radioactive contamination.” This standard is by its terms flexible and cannot be assumed to require a more stringent cleanup than the selected CERCLA remedial action.</p>

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Responses to Comments from California Department of Public Health (CDPH), (Larry Morgan, dated June 30, 2009 and received July 2, 2009) (Continued)			
14. (con't)			<p>Subsection (k) neither contains a numerical standard nor describes a narrative standard which would inform the question of whether (or what quantity of) radiological material can remain in the parcel. If there were a means to derive a narrative standard from (k), that standard has not been identified by the state. Without an identified narrative standard, there can be no basis for asserting that the requirement is more stringent than the CERCLA risk-based standards for the remedy. Although general goals can be considered state ARARs if they are directive in intent and enforceable (see NCP preamble at 55 Fed. Reg. 8746, March 8, 1990), CDPH has stated that California laws concerning possession of radioactive materials do not apply to property that remains in the possession of the federal government. Therefore, these laws are not currently enforceable as required by CERCLA and the NCP.</p> <p><i>The State Regulation is not Substantive.</i></p> <p>A state regulation must be substantive rather than procedural to qualify as a state ARAR (see definitions of "applicable" and "relevant and appropriate" in the NCP at 40 CFR § 300.5). CDPH asserts that, in particular, subdivision (k) is a potential ARAR because it contains substantive requirements. Since these three criteria apply to decisions to terminate a specific license, the Navy and EPA interpret them to be procedural and not substantive requirements.</p> <p>In summary, the Navy and EPA have determined that the provisions of <i>California Code of Regulations</i> tit. 17 § 30256(k) do not constitute an ARAR because: (1) they are neither "applicable" nor "relevant and appropriate", (2) they have not been demonstrated by the State to be more stringent than federal ARARs or risk-based cleanup levels, and (3) they are not substantive requirements. Nonetheless, the selected remedy achieves the objective of unrestricted release for radiological contaminants.</p>

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Responses to Comments from San Francisco City and County Department of Public Health - City and Lennar (Amy D. Brownell, dated and received June 24, 2009)			
GENERAL COMMENTS			
1.		We would like to point out for the record, that once the engineering controls and institutional controls are properly installed and maintained the current design of the proposed remedies will cut off pathways for: a) contact with soil contaminants and b) inhalation of indoor VOC vapors and this means that the entire property will be health protective for all types of uses.	Comment noted.
2.		Please put north arrows on Figures 1 through 7, 9, and 10 and add scales where appropriate.	The figures were amended as suggested.
SPECIFIC COMMENTS			
3.		Section 2.1, Site Description and History, 3rd paragraph. Please include a description of the historical uses specific to UC-2, rather than just the broader description of Parcel C.	The following text has been added to Section 2.1: <i>Historical use of the southern portion of Parcel UC-2 is as a roadway (Fisher Avenue), and the northern portion is as a triangularly shaped parking lot (at the corner of Fisher Avenue and Robinson Street) for Building 101.</i>
4.		Figure 2, Parcel UC-2 Location Map and Figure 9, Planned Surface Covers for the Soil Remedy. Please label Building 101 on Figure 2. Please note that Figure 2 shows the landscaped area that is covered with ice plant on the west side of Fisher Avenue, southeast of Building 101 whereas Figure 9 indicates that this area along Fisher Avenue will be repaired asphalt. Will this strip along Fisher Avenue instead undergo ice plant removal and soil cover? Please revise the first paragraph of Section 2.9.2, Description of Selected Remedy and Figure 9 , as needed.	Building 101 was labeled on Figure 2 as suggested. The Navy recommends refining that the proposed cover remedy as described in the response to Water Board specific comment 4. Figure 9 and Section 2.9.2 were revised to reflect these recommendations.

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Responses to Comments from San Francisco City and County Department of Public Health - City and Lennar (Amy D. Brownell, dated and received June 24, 2009) (Continued)			
5.		Section 2.5.1 Site Description and History, 4th paragraph. Please describe the intended use/reuse (street, utility corridor) of the areas that are not covered by a redevelopment block.	Please see the response to Water Board specific comment 1.
6.		Section 2.9.2 Description of Selected Remedy. Please remove the second sentence of the first paragraph "Future landowners will need approval from the regulatory agencies to modify the covers" and replace with the following "Modification of covers will be governed by the Risk Management Plan discussed below and its terms will be enforced by the regulatory agencies." Please consider inserting the following sentence prior to the previous sentence, "The RD will include plans for inspection and maintenance to ensure the covers remain intact".	The text in Section 2.9.2 has been revised as suggested: <i>Inspection and maintenance requirements for the durable covers will be specified in the remedial design (RD). Future landowners will need approval from the regulatory agencies to modify covers Modification of the covers will be governed by the LUC RD report and Risk Management Plan discussed below and its terms will be enforced by the regulatory agencies."</i>
7.		Table 6, footnote b States that the present worth costs of S-2 and S-3 (\$248K) and S-4 and S-5 (\$418K) are equivalent. Please explain how \$248K and \$418K are equivalent.	Footnote b to Table 6 has been revised to read: Excavation, disposal, and SVE of soil are not planned at Parcel UC-2. With exclusion of these remedies, the present worth costs for implementing Alternatives S-2 and S-3 (\$248,000) are equivalent and the present worth costs for implementing Alternatives S-4 and S-5 (\$418,000) are equivalent.

REFERENCES

- Department of the Navy. 2009a. Final Record of Decision for Parcel G, Hunters Point Shipyard, San Francisco, California. February 18.
- Navy. 2009b. Draft Final Record of Decision for Parcels D-1 and UC-1, Hunters Point Shipyard, San Francisco, California. May 20.
- San Francisco Redevelopment Agency. 1997. Hunters Point Shipyard Redevelopment Plan, City and County of San Francisco. July 14.
- SulTech. 2008. Final Feasibility Study Report for Parcel C, Hunters Point Shipyard, San Francisco, California. July 31.

TRANSMITTAL/DELIVERABLE RECEIPT

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TO: Contracting Officer
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DATE: 8/12/09
CTO: 0039
LOCATION:
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FROM: 
Steven Bradley, Contract Manager

DOCUMENT TITLE AND DATE:

Responses to Comments on the Draft Record of Decision for Parcel UC-2, Hunters Point Shipyard

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