

**From:** Kayaci, G Hamide CTR OASN (EI&E), BRAC PMO West [hamide.kayaci.ctr@navy.mil]  
**Sent:** Friday, May 28, 2010 12:45 PM  
**To:** Hall, Steve; Ono, Yohji  
**Subject:** FW: DTSC comments to Draft Parcel C Record of Decision, HuntersPoint Shipyard, San Francisco, California  
**Attachments:** Hunters Point Shipyard Draft Parcel C ROD comments\_5.28.10.pdf  
**Signed By:** hamide.kayaci.ctr@navy.mil  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

-----Original Message-----

**From:** Ryan Miya [mailto:RMiya@dtsc.ca.gov]  
**Sent:** Friday, May 28, 2010 11:52  
**To:** Forman, Keith S CIV OASN (EI&E), BRAC PMO West  
**Cc:** lmuha4@aol.com; Larry.Morgan@cdph.ca.gov; Tracy (CDPH-DDWEM) Jue; bvhprealtors@comcast.net; ripperda.mark@epa.gov; marie@greenaction.org; Alex Lantsberg; kristine@indiabasin.org; Yantos, Christopher N CTR OASN (EI&E), BRAC PMO West; Whitcomb, James H CIV NAVFAC SW; Kito, Melanie R CIV NAVFAC SW; Kayaci, G Hamide CTR OASN (EI&E), BRAC PMO West; rtomp@sbcglobal.net; Amy.Brownell@sfdph.org; mhagemann@swape.com; KBrasaemle@TechLawInc.com; Ross Steenson  
**Subject:** DTSC comments to Draft Parcel C Record of Decision, HuntersPoint Shipyard, San Francisco, California

Keith,

I have attached DTSC's comment letter in response to the following submittal:

Draft Record of Decision for Parcel C, Hunters Point Shipyard, San Francisco, California dated April 2, 2010.

The signed original letter will follow to you only in the mail. If anyone else would like hard copies of the document, please let me know.

Thanks,  
Ryan

Ryan Miya  
Senior Hazardous Substances Scientist  
Brownfields and Environmental Restoration Program - Berkeley Office Department of Toxic Substances Control 700  
Heinz Avenue Berkeley, CA 94710-2721  
Phone: 510-540-3775  
FAX: 510-540-3819



Linda S. Adams  
Secretary for  
Environmental  
Protection



## Department of Toxic Substances Control

Maziar Movassaghi, Acting Director  
700 Heinz Avenue  
Berkeley, California 94710-2721



Arnold Schwarzenegger  
Governor

May 28, 2010

Mr. Keith Forman  
Department of the Navy  
1455 Frazee Road Suite 900  
San Diego, CA 92108-4310

### **COMMENTS TO THE DRAFT RECORD OF DECISION FOR PARCEL C, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA**

Dear Mr. Forman:

The Department of Toxic Substances Control (DTSC) has received and reviewed the Draft Record of Decision for Parcel C dated April 2, 2010 (Draft ROD) prepared by the Department of the Navy for Hunters Point Shipyard, San Francisco, California.

Comments to the Draft ROD from the California Department of Public Health's Environmental Management Branch (CDPH-EMB) are presented as an enclosure to this letter. Based on our review, DTSC has the following comments:

(1) General comments.

- (a) Please add the word "ubiquitous" before the word metals, or any specific metal, in any of the descriptions presented in the Draft ROD that are applicable to metals concentrations that are present onsite as a result of the serpentine bedrock fill material. Therefore, when "ubiquitous" is not used, it is clear that the text refers to metals that are present as a result of historic contaminant releases onsite.
- (b) Consideration should be given to include a figure that presents all Parcel C areas that will require institutional controls with different labels that define the basis for its inclusion (soil, groundwater, and/or soil gas).

(2) Section 2.3 – Previous Investigations.

- (a) Paragraph two. Please specify if the Time-Critical Removal Action (TCRA) mentioned refers to / includes information from the ongoing basewide storm drain and sewer line removals or another TCRA implemented at Parcel C (fuel and steam line removals and closure in 2002?).

- (b) Paragraph five. Please consider adding a sentence regarding the groundwater treatability study that is currently being implemented at Remedial Unit – C5 to address / reduce volatile organic compounds in soil and groundwater.
  - (c) Paragraph six. Please clarify if the storm drain and sewer line map presented in Figure 8 still includes those lines that have already been removed at portions of IR-06 and IR-25 in 2007 or if the figure has been updated accordingly.
- (3) Table 1 – Previous Investigations and Removal Actions.
- (a) Feasibility Study – Initial Phase (1996-1998). Please verify that any IR site that reported soil or groundwater concentrations that exceeded cleanup goals for the residential land use scenario have been carried forward to the current Record of Decision. For example, IR sites within areas that have been classified under the industrial reuse category should have still been carried forward if soil and/or groundwater data indicated that residential cleanup goals were exceeded.
  - (b) Soil Beneath Buildings 134, 203, 214, and 231, Data Gap Investigation (2009-2010). Please verify that the report documenting the results of the investigation has not yet been provided for regulatory review.
  - (c) Phase I and II UST Removal Action (1991-1993). Please verify if the Navy has received approval from the San Francisco Bay Regional Water Quality Control Board on all of the twenty-eight USTs, or if this information is currently in process.
- (4) Section 2.5.1 – Human Health Risk Assessment (HHRA). The HHRA results presented in Table 2 and described in the text present cancer risks and noncancer hazards for each Parcel C redevelopment block. Chemical risks and noncancer hazards for all redevelopment blocks should be evaluated using the residential exposure scenario independent of planned reuse. The residential exposure scenario is the most conservative and is necessary because reuse areas / development blocks may change in the future. Furthermore, exceedances of the unrestricted land use scenario (residential) risks can then be used to justify the need for remedy selection.
- (5) Table 3 – Chemicals of Concern in Soil and Groundwater Requiring a Response Action. This table should be expanded or an additional table added to identify the general locations (IR sites and depths below ground surface) from which individual maximum concentrations for each chemical of concern was detected as well as the frequency of Parcel C detections that exceeded residential land use criteria.
- (6) Section 2.5.3 – Basis of Response Action. Last paragraph, last sentence.

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Please clarify if the expanded soil excavations mentioned in the text have been updated and are currently reflected in Figure 10. If not, the figure should be updated to include the expanded excavation areas.

- (7) Section 2.7 – Remedial Action Objectives (RAOs). Groundwater RAOs subsection, second RAO. Please clarify why this groundwater RAO is not site-wide and only applies to RU-C5.
- (8) Figure 10 – Planned Soil Remediation.
  - (a) Consideration should be given to re-title the figure “Planned Soil Excavation and Soil Vapor Remediation” to clarify that both soil vapor extraction remediation areas and excavation areas are identified in the figure (not just soil).
  - (b) The designation of “Area Requiring Institutional Control” in the figure should be more clearly defined because it leaves the erroneous impression that the remaining portions of Parcel C will not be subject to any institutional controls.
- (9) Table 4 – Remediation Goals for Soil and Groundwater. Residential cleanup goals should be applied to all Parcel C areas independent of future planned reuse. See comment 4 above.
- (10) Section 2.9.2 - Description of Selected Remedy.
  - (a) Paragraph one. Soil confirmation sampling should be mentioned as a component of the remedial action following excavation and before backfilling with clean soil.
  - (b) Paragraph one, last sentence. Please verify that when the text states that open excavations will be backfilled and “covered appropriately”, the cover to which the text is referring is a durable cover as described in the selected remedy.
  - (c) Please clarify how soil vapor intrusion issues will be addressed in the context of the Soil Vapor Extraction (SVE) treatment. A brief description of the criteria that was used to define and establish onsite SVE treatment areas should also be included.
  - (d) Confirmation soil sampling and scanning should be added to the description of radiological remediation to confirm all impacted soil and structures will be cleaned up to residential / unrestricted reuse standards.
  - (e) Institutional Controls (ICs) subsection. Descriptions should be added to briefly highlight additional health and safety components that will be associated with the selected remedial actions. For example, a site-specific health and safety plan will include safety measures to protect human health and the environment from contaminants in excavated soil and groundwater during remediation; fences will be set up to secure remediation areas and prevent trespassing during construction; and excavated soil will be handled in

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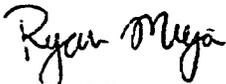
accordance with an approved dust management plan to prevent dust generation and erosion during stockpiling, transportation, and offsite disposal.

(11) Editorial comments.

- (a) Section 2.5, paragraph one, sentence one. Please remove the word "several" from the sentence.
- (b) Section 2.5, paragraph one, sentence three. Please verify if root uptake is in fact a primary fate and transport mechanism for Parcel C given that most of the site is covered with pavement. If not, please remove from the text.
- (c) Section 2.9.2, paragraph four, sentence seven. Any references to "future document(s)" should be removed.
- (d) Section 2.9.2, page 60, paragraph five. "residential" should be added to before the phrase "remediation goals" for clarification and emphasis.
- (e) Section 2.9.3, paragraph one, last sentence. Please reference the specific redevelopment plan to which this statement applies, because the statement may no longer be true if reuse areas / development blocks change in the future.
- (f) The cost breakdown charts for each alternative should be referenced in the Cost subsection on page 57, Table 6, and Table 7.

If you have any questions regarding these comments, please call me at (510) 540-3775.

Sincerely,



Ryan Miya  
Senior Hazardous Substances Scientist  
Brownfields and Environmental Restoration  
Program - Berkeley

Enclosure

E-mail distribution:

Mr. Mark Ripperda, U.S. Environmental Protection Agency Region IX  
Mr. Ross Steenson, Regional Water Quality Control Board, San Francisco Bay  
Region  
Ms. Amy Brownell, City of San Francisco  
Ms. Karla Brasaemle, Tech Law, Inc.  
Ms. Melanie Kito, Department of the Navy  
Mr. James Whitcomb, Department of the Navy  
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E-mail distribution continued:

Mr. Chris Yantos, Department of the Navy  
Ms. Tracy Jue, California Department of Public Health  
Mr. Larry Morgan, California Department of Public Health  
Ms. Kristine Enea, Community resident  
Mr. Leon Muhammad, Community resident  
Dr. Raymond Tompkins, Community resident  
Ms. Diane Wesley Smith, Community resident  
Ms. Marie Harrison, Greenaction  
Mr. Alex Lantsberg, IBNA Boardmember  
Mr. Matt Hagemann, TAG consultant