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Ser 09ER1DS/5060  
23 November 1994

Mr. Cyrus Shabahari  
Project Manager, Office of Military Affairs  
Department of Toxic Substances Control (DTSC), Region 2  
California Environmental Protection Agency  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2737

SUBJ: STATUS OF OFF-SHORE AREA, ENGINEERING FIELD ACTIVITY WEST,  
HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA

Dear Mr. Shabahari:

In response to your letters dated October 7, 1994 and November 15, 1994, in which you requested the Navy's position regarding the property under water at Hunters Point Annex (HPA), we are providing the following comments and proposals. We hope this information will be satisfactory to you.

In your October 7, 1994 letter you stated that the "IAS (Initial Assessment Study) reached logical conclusion of further investigating the off shore areas for extent and impact on the Bay." We could not find the same conclusion in the IAS. However, it does contain information on a 48 hour sediment bioassay conducted in 1971 which showed no significant mortality to fish. The IAS found that the Bay sediment "immediately below the shipyard shoreline" is contaminated with heavy metals and other hazardous pollutants, but recommended no confirmation study be conducted for the Bay sediment. This is because the IAS concluded that the "contaminants in the sediment are tightly bound and thus are not mobile unless the sediment is disturbed." The conclusion of the IAS was that the sediment is "best left undisturbed. Therefore, no further action for this site is recommended."

To address the agencies' concerns, and to facilitate the transfer of Hunters Point Annex, we propose to create a separate parcel, Parcel "F", which will cover the offshore area of HPA extending out to the property boundary. We also propose to conduct a Preliminary Assessment (PA) in the off shore area as part of the Phase 1B Ecological Risk Assessment. Based on the results of the off-shore PA and the Phase 1B Ecological Risk Assessment, it can then be determined whether the site merits further investigation or mitigation measures.

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Should you have any questions regarding this matter, the point of contact is Commanding Officer, Engineering Field Activity West, Naval Facilities Engineering Command (Attn: Mr. Dave Song, (Code 09ER1DS), (415) 244-2561).

Sincerely,

**Original signed by:** *M. McClelland*  
**RICHARD POWELL**  
Lead Remedial Project Manager  
By direction of  
the Commander

Copy to:

U.S. Environmental Protection Agency (Attn: Alydda Manglesdorf)  
California Regional Water Quality Control Board (Attn: Richard Hiett)  
City and County of San Francisco (Attn: Amy Brownell)  
National Oceanic & Atmospheric Administration (Attn: Denise Klimas)  
U.S. Department of the Interior (Attn: Arthur Brown)  
U.S. Fish & Wildlife (Attn: Jim Haas)  
California Department of Fish & Game (Attn: Mike Martin)  
San Francisco Redevelopment Agency (Attn: Byron A. Rhett)

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