

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

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BERKELEY, CA 94710-2737N00217.003126
HUNTERS POINT
SSIC NO. 5090.3

September 22 , 1995

Engineering Field Activity, West
Attn: Mr. William Radzevich [Code 1823.2]
900 Commodore Drive
San Bruno, California 94066-5006

Dear Mr. Radzevich:

**REMOVAL ACTION DOCUMENTATION GANT CHARTS (CHARTS) HUNTERS POINT
ANNEX**

The Department of Toxic Substances Control (Department) appreciates the opportunity to review the removal action gant charts. As I indicated in the RPM meeting on 9/14/95, we are forwarding the following comments for your consideration.

Before we can comment on the particulars of the gant charts, we need to understand the definition of each task. For example, it is not clear what "begin design" and "implementation" mean, and why "implementation" of the removal action is before "design". Further, there is no discussion as to how the RAC contract fits into the schedules. It is important to keep the continuity between the two contracts and prevent the transition to have any unfavorable impact on the removal actions. We would like to see the CLEAN II and RAC contracts transition be reflected in the Charts. This transition is important for FY 96 funded removal actions. In addition to the gant charts, the Department requests to see a set of schedules similar to the FFA schedule format. The FFA format is easy to understand and follow.

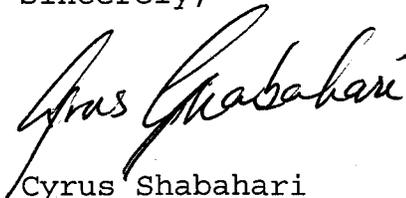
With respect to the Exploratory Excavation criteria, we are concerned that the excavations will be implemented without a clear understanding on the volume and area of excavations. It is not clear how much excavation equals "limited volume". And further, to base the volume of excavation on "visual observation" lacks scientific reasoning. We believe that there needs to be a quantifiable limit to the volume and extent of excavations.



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Should you have any questions regarding this letter and would like to seek clarification, please call me at (510) 540-3821.

Sincerely,



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