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HUNTERS POINT
SSIC NO. 5090.3

March 31, 1998

Cal/EPA

Department of
Toxic Substances
Control

700 Heinz Avenue,
Bldg. F, Suite 200
Berkeley, CA
94710

Commanding Officer
Engineering Field Activity, West
Attention: Code 18, Mr. Richard Powell (1832)
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-5006

Pete Wilson
Governor

Secretary for
Environmental
Protection

RE: Parcel E Draft Feasibility Study Report, Hunters Point Shipyard, San Francisco, California

Dear Mr. Powell:

The Department of Toxic Substances Control and Department of Health Services have completed review of the above document and followings are our comment.

Page no.	Comments
ES-24	Why are sheetpile wall and interceptor trenches to be constructed offshore? Would encapsulating groundwater AOCs and discharging collected groundwater to the bay or wetland still be meeting ARARs?
Fig ES-3	What is the difference between red square dots and red round dots.
2-25	How is RI screening criteria were not used to exclude hazardous substances or petroleum hydrocarbons from HHRA but were used only to help determine whether and where release of hazardous substances or petroleum hydrocarbon had occurred? If the screening criteria determine a release hasn't occurred doesn't it in effect exclude the area from HHRA?
3-2	When the text states the risks exceed the 1x10E-06 to 1x10E-04 range, doesn't it mean they exceed 1x10E-04? Shouldn't the text simply state they exceed 1x10E-04?
3-6	Should Soil RAO limited to address exposures only from surface to groundwater tables? Contaminations at depth may not be immediately available to human exposure. The concept of leaving contamination in ground without addressing it is a major shift in policy.

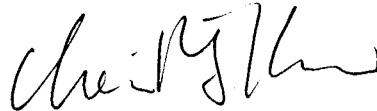
- 3-13 **Since** the model to calculate DAFs is deemed unreliable based on current discussion on Parcel B Remedial Design, would this section be rewritten and more emphases are placed on monitoring at POC with some sentinel wells as early warning system?
- 3-68 Multilayer capping is not retained for remedial alternative development and screening in the miscellaneous soil remedial unit. **If any** of the areas in miscellaneous soil remedial unit contains hazardous waste level of contamination, single-layer capping will not meet ARAR requirements.
- 3-82 **If full** scale treatment of groundwater is considered as contingency, **were** the treatment costs included in the alternative comparison?
- 3-92 **When** consider groundwater remedial technologies, high salinity in the groundwater should be taken into consideration. Most technologies are developed based on fresh water.
- 4-6 **In light** of the delay due to validation study for Ecological Risk Assessment, the Navy should consider filling these data gaps at the same time before finalizing FS.
- Are the proposed mitigative measures considered as removal actions? Several Alternatives describe "visibly contaminated soil during fuel line excavation . . . would also be managed . . ." Visibility of contamination is too vague a term to determine the final remediation.
- 4-11 "A multilayer cap is applicable under all three cleanup scenarios . . ." is incorrect. Any form of caps should not be considered in conform with either residential or industrial cleanup scenario.
- 4-19 **When** stockpile excavated contaminated soils, they can only be stockpiled within the Areas of Contamination.
- 4-28 Additional soil may need to be removed around the ring of open excavation after skimming LNAPLs.
- 4-30 "Visibly contaminated soil" is too subjective a term to be used in remedy selection. There are no scientific bases to treat visibly contaminated and non-visible contaminated soil separately.
- 4-52 **The** use of IR-01/21 and IR-02 Northwest debris zones as CAMU for placement of contaminated soils could potentially create a mont and change the topography of the area and any negative impact

should be discussed.

- 4-70 The objective of groundwater monitoring is not clear. Trigger levels should be specified where concentration exceeds the trigger level may invoke certain actions under a contingency plan. Monitoring of groundwater outside of encapsulated areas should also be included.
- 5-19 Without excavation of saturated zone contaminated soil, collected groundwater without treatment may not meet the requirements to discharge to Bay or constructed wetland.

If you have any questions, Please contact me at (510) 540-3822.

Sincerely,



Chein Ping Kao, P.E.
Senior Hazardous Substance Engineer
Office of Military Facilities

Enclosures

CC: Ms. Sheryl Lauth
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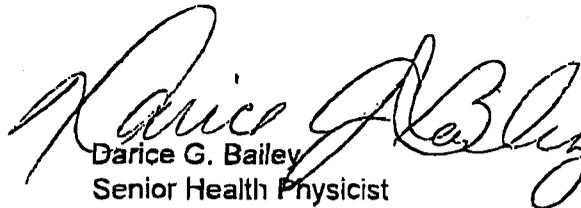
Memorandum

Date: March 30, 1998
To: Mr. Chein Kao
Department of Toxic Substances Control (DTSC), Region 2
Office of Military Facilities
700 Heinz Avenue, Suite 200
Berkeley, California 94710

From: Environmental Management Branch
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Subject: Department of Health Services' (DHS) review of "Appendix B" and Page 4-9 of Parcel E Feasibility Study, Draft Report, Hunters Point Shipyard, San Francisco, California dated January 15, 1998.

Attached are DHS' comments on the subject document. This review was performed by Deirdre Dement in support of the Interagency Agreement between DHS and DTSC. If you need additional information, please contact Ms. Dement at (916) 324-1378.


Darice G. Bailey
Senior Health Physicist

cc: Ms. Deirdre Dement
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Department of Health Services

Review of "Appendix B" and Page 4-9 of *Parcel E Feasibility Study, Draft Report, Hunters Point Shipyard, San Francisco, California* dated January 15, 1998.

March 27, 1998

DTSC Resource Planning Form # 380

The following comments are in response to the request from Mr. Chein Kao of the Department of Toxic Substances Control to review Appendix B and Page 4.9 of the *Parcel E Feasibility Study Draft Report*, for Hunters Point Shipyard, located in San Francisco, CA.

General Comments:

1. Appendix B summarizes the radiation risk assessment for Hunters Point Shipyard Parcel E which was prepared as Appendix P to the Parcel E Remedial Investigation which was previously reviewed by DHS. (See General Comment number 2, from DHS' responses dated August 29, 1997.)

Specific Comments:

1. Page 4-9, Section 4.2.4, Paragraph 1. It appears from the text that the Navy "expects" to cap the disposal dump area of IR-02 or attempt to locate and remove the radium devices. While it may be found acceptable to leave these in place, it should again be stated DHS would require controls (i.e., including restrictions on access, intrusion, excavation, future removal of devices, etc.) or licensure to restrict public access and use of the site if the devices are not removed and the property is transferred out of federal jurisdiction. The specific controls required would need to be discussed with DHS on a site-specific basis.
2. Page 4-9, Section 4.2.4, Paragraph 2. It is noted that the other areas which appear to have radium devices from the redistribution of soil from the disposal dump area of IR-02, are expected to have all the redistributed devices located in the top two feet of soil. From the previous information provided to DHS, it is unclear how it will be determined that all of the devices are recovered. Please review DHS' General Comment 2, dated December 24, 1997, from the DHS' review of the Navy's Responses to DHS' Comments, which requests information regarding the depth and the compaction depth of the fill material. It is also not clear how the instrumentation, which is reported to detect radium dials at approximately 18 inches, would be adequate to verify that radium devices were not buried at depths greater than 18 inches.
3. Page 4-9, Section 4.2.4, Paragraph 3. This paragraph appears to clarify DHS' Specific Comment 1, dated December 24, 1997, from the review of Appendix E, Page E-25, Section 2.3.2.8. This paragraph appears to state that the Navy proposes to remove the areas of contamination around the Building 707 concrete pad. After these areas are remediated or considered ready for release for unrestricted use, DHS will want to review the remediation report and possibly participate in confirmation or verification surveys of these areas.