

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

May 14, 1998

Mr. Richard Powell, Code 1832  
Department of the Navy  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, CA 94066-5006

Mr. Michael McClelland, Code 62.3  
Department of the Navy  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, CA 94066-5006

RE: Navy Responses to EPA Comments, Draft Construction Summary Report, Pickling and Plate Yard (PPY) Removal Action, Hunters Point Shipyard

Dear Messrs. Powell and McClelland:

EPA has reviewed and considered the Navy's responses to our comments. Unfortunately, a number of the responses are unsatisfactory. Based upon review of the report, EPA has determined that the Navy did violate RCRA during the PPY removal action at Hunters Point Shipyard. The responses to our comments did not change this determination. In particular, inadequate waste determination was the most common RCRA violation to occur during the PPY removal action. This was explained to the navy in greater detail in our April 14, 1998 letter to Hank Gee regarding RCRA violations at Hunters Point Shipyard.

In addition, EPA wants to emphasize that all removal action work on a given parcel must be consistent with the cleanup goals of the ROD for that same parcel. Otherwise, additional work will be required as part of the parcel remedial action to ensure that any remaining cleanup post removals is conducted in accordance with the ROD requirements.

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In order to bring closure to this removal action, EPA suggests that the Navy meet with us to discuss how to more adequately respond to our comments and how best to revise and finalize the document. Please call me at 415-744-2409 at your earliest convenience to schedule such a meeting.

Sincerely,



Claire Trombadore  
Remedial Project Manager

cc: Tom Huetteman, EPA  
Sheryl Lauth, EPA  
Bill Radzevich, EFA-West, Code 1832.2  
Valerie Heusinkveld, DTSC  
David Leland, RWQCB  
Jim Sickles, TtEMI

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