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Date: January 20, 1998

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Sub: Draft Parcel B Petroleum CAP, Hunter's Point Shipyard - Comments

Dear Ms. Clark:

On behalf of the City and County of San Francisco's Redevelopment Agency, City staff are pleased to provide comments on the Draft Petroleum Corrective Action Plan (CAP) for Hunter's Point Shipyard Parcel B. Our comments are organized in a fashion that first discusses detailed page by page comments and then provides general "summary" comments.

Executive Summary Page vi - In areas where IR studies call for remedial activities, have petroleum cleanup plans been incorporated into cleanup strategies?

Executive Summary Page vi - It is our understanding that a RWQCB Order has not been developed for HPS. Does the Navy plan to wait to make the CAP final before an Order has been issued?

Executive Summary Page vii - In both the Summary and in following text, the rationale for excluding assignment of toxicity values for TPH-mo is unclear.

Executive Summary Page vii - What is the basis for the assertion that toxicity values for parcels B and C are representative of the entire HPS?

Executive Summary Page viii - Comments on toxic effects focus on "statistically observable" effects and may assume that no human health risks exist. This may be true as long as current "exposure barriers" are well maintained. What would happen if barriers were not maintained and exposure pathways developed?

Page 1 and 2 – The focus of the draft CAP appears to be bioassay analyses of eco-risks and has apparently resulted is risk-based cleanup levels. Are potential human health risks associated with petroleum products presumed to be non-issues due to the existence of an incomplete cap or barrier?

Page 5 – The current draft basewide FOSL finds that many areas of HPS are suitable for lease to the City of San Francisco (City) and the San Francisco Redevelopment Agency (SFRA) with many restrictions. Until such time as the restrictions are lifted and cleanup is completed, SFRA's ability to sub-lease any property is limited.

Page 6 – Since parts of the storm drain system are beneath groundwater, have any studies been done to measure how the storm drain system may act as a preferential pathway for petroleum product movement? Has the storm drain cleanup and repair project been completed?

Page 8 – Has there been any resolution to the disagreement between the Navy and the State over the "potential drinking water source" issue?

Page 10 – How much soil has been excavated (or is planned to be excavated) at IR-06 as of January 1998?

Page 10 – IR-07 has soil borings showing TPH-d in excess of 189.4 mg/kg yet no removal actions are limited to removal of 80cy. How was 80 cy chosen?

Page 11 – IR-10 has TPH-d at 670 mg/kg but planned removal is 20cy. Why 20cy?. Is the general plan 20cy per boring showing contamination?

Page 11 – IR 18 is reported to have been the site of dumping of 50,000 to 100,000 gallons of waste oils and other liquids. Is the plan of one day of removal of 25cy sufficient?

Page 12 – IR 20 only has one day of 20cy soil removal. Is it correct to assume this means there was one boring with a TPH hit?

Page 13 – IR 23 had ASTs with surface staining and one UST; how is one-day removal of 25 cy deemed sufficient?

Page 14 – IR 24 had multiple TPH sources and possibly commingled contaminants. Is the recommended removal of 230cy only in suspect TPH areas or is this the extent of all IR excavation activity?

Page 16 – IR 26 had some very high TPH-mo hits yet removal actions seem limited to one day's 20cy removal. Why? The draft final Parcel B Feasibility Study stated that EE-04 and EE-05 had TPH-mo above PRG's and screening criteria – has this changed?

Page 17 – IR 60 –Have or will petroleum products be removed from the drydock?

Page 18 – IR 62 has apparent UST releases but no soil removal is discussed. Why?

Page 19 – Even if 50 years of weathering has taken place, there is still a lot of detectable petroleum product in soil and groundwater!

Page 29 and 30 – The CAP presumes that since TPH-mo cannot be demonstrated to be toxic, it's not an issue. Couldn't it also be assumed that it is toxic in sufficient concentrations? Just because it had no "observed effect" does not mean that effects may not be observable!

Page 30 – Given the variability of subgrade fill, how appropriate was the calculation of a site specific Leachate factor based on only two samples?

Page 31 – It may have been unwise to stop TPH-mo toxicity testing based on one test.

Page 34 – Who will conduct air quality monitoring during excavation activity, and who will receive the reports? Who will prepare the plan?

Page 47 – The statement is made that "target groundwater treatment concentrations ... will depend on appropriate discharge options (e.g., storm sewer system or POTW limits)" We certainly hope there will be **no discharges to the storm system** and everyone planning these activities had better get in touch with the Pretreatment group's Tommy Lee at (415) 695-7310 as soon as possible.

Page 53 – It is extremely difficult to cross check or correlate removal actions presented here with others discussed in other Parcel B documents.

Page 54 – The comment that areas with TPH concentration above cleanup levels that apparently have not migrated to groundwater require no cleanup presents problems. Has sufficient characterization been done to prove this?

Page 55 – **When will the "confirmation sampling plan" be available?** Is this the same document or is it part of the RA/RD document package for parcel B

General Comments

1) A lot of cleanup planning has been based on a relatively limited number of samples (at least those discussed in this CAP) There is some feeling that the CAP presents a limited characterization of the extent of TPH contamination.

2) There is some uncertainty over how the CERCLA contaminated focused cleanup will address petroleum product contamination.

3) Since there appears to be a lot of TPH-mo onsite, it appears that more effort should have gone into toxicity studies and development of cleanup levels.

4) The City and the SFRA are concerned that the cleanup process and natural attenuation and/or biodegradation may not solve short-term problems. How will the City, SFRA and future sublessees deal with any unforeseen or existing TPH product or contaminated soil during maintenance activities?

Thank you for the opportunity to comment on the Draft. Please call John Chester at 554-8378 or me at 554-8374 if you have any questions or need more information.

Sincerely

Steve Mullinnix
Division Manager
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