

Arc Ecology

Environment, Economy, Society, & Peace

Comments by Arc Ecology on Hunters Point Shipyard Draft Final E-2 RI/FS
(Sent by email June 12, 2009)

Thank you for the opportunity to comment on the Draft Final RI/FS report. This 2500 page work exhaustively documents the historic and present status of Parcel E-2 and clearly states the Navy's analysis of alternatives for remediation. Arc Ecology plans to make extensive comments on the Proposed Plan when it becomes available but would like to mention some general concerns at this time.

1. There are still references to a "presumptive remedy" that involves capping the landfill area. EPA guidance precludes analysis of alternatives for presumptive remedies and precludes presumptive remedies when alternatives are analyzed. Use of the term "presumptive remedy" is a prejudicial argumentative device that tends to bias the reader to accept the capping alternative as the logically reasonable one when, in fact, there is no presumptive remedy for Parcel E-2, as evidenced by 2500 pages of RI/FS. Please remove all references to presumptive remedy except to state that it does not apply in this case.
2. There are other reasonable subjective rankings of the alternatives than the ones presented in the summary Table ES-1.
 - a. For example, Alternative 2 was rated low for short term effectiveness and for implementability. However, assuming that customary worker safety and community protection measures are followed, there would be little or no short term failure to protect health and the environment during excavation and removal.
 - b. Implementing Alternative 2 would involve the same activities that have been going on for several years: excavate, screen, and dispose of contaminated material. The community has put up with nearby sewer plants, former slaughter houses, and often hundreds of trucks per day transporting soil to and from the shipyard. A few more years of activity are likely to be acceptable given the long term efficacy of removing the contents of the landfill. Implementability does not seem to be a serious barrier to excavation and off-site disposal.
 - c. The high cost of Alternative 2 (\$300M) compared to the others (\$80M) seems exaggerated. Assuming the volume to be removed is 400,000 cubic yards, then a rough estimate of \$1500 to truck 15 cubic yards away on a 10 hour round trip results in an estimate of \$40M for excavation and disposal. The cost of restoring wetlands in San Francisco Bay has been estimated at approximately \$42,000 per acre including land acquisition, planning and implementation, monitoring for 10 years, and operation and maintenance for 50 years (www.savesfbay.org/greeningthebay). The landfill is approximately 22 acres so restoration of this area after excavation would cost approximately \$1M. Adding these two costs together and doubling them to provide a margin of error gives a total of \$82M. Special handling of a few percentage points of radiologically impacted soil might increase the costs, but Alternative 2 seems much closer in cost to the others than the 3-4 times multiple listed in the table.
3. Public acceptance, a criterion not included in the table, is unlikely for any alternative other than excavation and removal. City-wide votes, Board of Supervisors resolutions, and local community comments have all strongly favored something similar to Alternative 2. Please explain how this strong public sentiment will be addressed in the remedial alternatives.
4. There is very little mention in the RI/FS of other ongoing planning efforts at Candlestick Point, the state park, the Yosemite Slough watershed, and stormwater treatment wetlands potentially sited on E-2. Please describe how the selected alternatives would coordinate with these other regional efforts.

5. Removing the landfill and hotspots would permanently remove the source of soil and groundwater contamination and make up for what we see as some weaknesses in the ecological risk assessment (see below).

Section 7.2.2.2 “food chain modeling for birds and mammals was not considered necessary given several factors...”

The factors listed do not preclude the need for food chain modeling to assess the ecological risk to upper trophic levels. In fact, immediately following is the statement that the contaminants listed below pose a risk to birds and mammal.

Metals: cadmium, copper, lead, manganese, mercury, nickel, vanadium, and zinc;
Total DDT: sum of detected concentrations of 2,4'-DDT and 4,4'-DDT;
Total PCBs: sum of detected concentrations of all Aroclor compounds; and
Total high molecular weight (HMW) polycyclic aromatic hydrocarbons (PAHs): sum of detected concentrations of benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenz(a,h)anthracene, fluoranthene, indeno(1,2,3-cd)pyrene, and pyrene.

- Please resolve the conflict between the clearly stated ecological risk and the lack of a need to model this risk.

7.2.2.3. Shoreline SLERA Results for Birds and Mammals

“Significant risk to birds is indicated only for the willet exposed to PCBs. No significant risk to either the surf scoter or the red-tailed hawk was indicated by the food-chain modeling. Other chemicals for which potential risk to birds is suggested included cadmium, copper, lead, mercury, PCBs, total DDTs, and dieldrin.

Birds and mammals are at risk from exposure to PCBs in surface and subsurface sediment along the Parcels E and E-2 shoreline.”

Neither the surf scoter nor the red-tailed hawk is likely to forage in the shoreline area so food chain modeling with these species is of questionable relevance. The only shorebird examined, the willet, was found to be at risk.

- Please justify using scoter and hawk in the modeling and change the wording about the willet to something such as, “The only shorebird used to assess ecological risk, the willet, was found to be at significant risk. Other shorebirds would also likely be at risk.”

Please feel free to contact me if there are any questions about these comments.

Sincerely,

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