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Subject: RWQCB Comments - Internal Draft Proposed Plan for Parcel E-2 - Hunters Point
Date: Monday, July 11, 2011 1:33:27 PM

Lara,

I reviewed the Internal Draft Proposed Plan for Parcel E-2 with transmittal letter dated May 24, 2011. I also reviewed the California Department of Toxic Substances Control comments (dated June 29, 2011), the comprehensive EPA comments (dated July 8, 2011), and City comments (dated July 11, 2011). I support these comments, and provide the following additional comments.

1. The CERCLA Process, third paragraph of section – Clarify that the sections “Past Investigations” and “Previous Removal Actions” are in the RI/FS.
2. Site Background, third paragraph of section – In the last sentence, rather than describing what Parcel E-2 is “mostly” going to be used for in the future, please list all future uses of Parcel E-2.
3. Site Background, fifth paragraph of section – Please address the following:
 - 3a. Numbers of Samples for Conventional vs. Radioactive Chemical Testing - Do these sample numbers include both conventional chemical and radioactive chemical testing? If possible, make this clear so that when the reader encounters the sentence “The Navy collected 1,000 soil samples from Parcel E-2 and analyzed the samples for various radioactive chemicals” in the last paragraph of the sub-section entitled “Potential Radioactive Wastes at Parcel E-2”, it is clear how these numbers of samples relate.
 - 3b. Fourth Bullet “Special Investigations” – Check the sentence to see if the word “including” should be changed to “included.”
4. Site Characteristics, third paragraph of section – Please state the maximum estimated thickness of the waste. Also, in an appropriate location within the document, state the range of depths to first groundwater across the landfill (landward to bayward).
5. Site Characteristics, Potential Radioactive Wastes at Parcel E-2 – Please address the following:
 - 5a. First paragraph of section - Consider underlining the word “may” in the first sentence to add emphasis.
 - 5b. Second paragraph – For the sentence beginning with “Radium-226” replace “at” with “in” in the phrase “found at Parcel E-2 soil.”
6. Summary of Site Risks, first paragraph of section and Figure 8 – In the second sentence, consider adding shoreline sediment to the media listing. Also, since the figure does not show people touching soil, I suggest changing the phrase in parentheses to better reflect the illustration.
7. Remedial Action Objectives – Please address the following:
 - 7a. Second paragraph of section - In the next-to-last sentence, replace “each” with “the.”
 - 7b. Remedial Action Objectives for Landfill Gas – Confirm that you want to state numerical objectives in the text; the other RAOs refer to supporting tables.
 - 7c. Remedial Action Objectives for Groundwater, fourth bullet – Insert “in groundwater” after “chemicals.”
8. Summary of Remedial Alternatives, Alternatives 4 and 5 – In the sentence beginning with “Radioactive contamination”, I believe that “Alternative 3” should be changed to “Alternatives 4 and 5.”
9. Evaluation of Alternatives – Please address the following:

9a. First paragraph of section - There's an unnecessary space in the word "appropriate" before ARARs.

9b. Criteria 5, 6, and 7 – Consider adding a few sentences detailing why it would be difficult to carry out Alternative 2.

10. Summary of the Preferred Alternative, Why is this the preferred alternative, third bullet – Indicate how the soil immediately below the cover (existing cover?) would be cleaned up (removed and disposed off-site?).

11. Attachment 1 (Applicable or Relevant and Appropriate Requirements, Groundwater, Bullet 5) – While I recognize that this language is taken directly from the Final RI/FS, the language is awkward because it leaves the impression that Resolution 88-63 directly addresses Hunters Point Naval Shipyard (HPNS). My recommendation is to use the language from other HPNS Final Feasibility Studies in conjunction with this wording, as follows:

"SWRCB, Resolution 88-63, identifies exceptions to potential sources of drinking water. Evaluation by the Navy indicates that A-aquifer groundwater at HPS is not a potential source of drinking water source, and that B-aquifer groundwater has a moderate potential for use as a drinking water source."

In the interest of brevity, my proposed language does not include mention of the September 25, 2003 Regional Water Board staff concurrence regarding the potential beneficial use of A-aquifer groundwater, etc.

12. Figure 9 (Alternative 5 Hotspot Excavations and Groundwater Containment Features) – If possible, make the line type for the slurry wall more distinctive from the line type used for the landfill boundary.

Let me know if you have any questions regarding these comments.

Regards,

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