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HUNTERS POINT
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Draft Technical Memorandum, Soil Vapor Investigation in Support of Vapor Intrusion Assessment, Parcels B, D-1, G and UC-2, Hunters Point Shipyard, dated July 2011.

This letter contains comments from the City and Lennar.

General Comments

1. The report uses "Tier 1", "Tier I", "Tier 2", and "Tier II" throughout the text. Recommend selecting a consistent designation and applying it to the report (text, tables, and figures).
2. Please revise the text to clarify that the SVI activities were conducted to define **soil gas** ARICs and not any other types of ARICs (e.g., soil, groundwater, radiological impacts).
3. The document variously attributes the presence of VOCs in soil gas to "off-gassing" from underlying groundwater or to partitioning from residual VOCs in soil. We recommend adjusting the text to state more generally that the VOCs in soil gas could be attributed to VOCs in groundwater and/or soil.
4. Please remove all references to redevelopment blocks. The redevelopment blocks are an outdated concept and, more importantly, the redevelopment blocks are not shown on any of the figures in the main body of the report and are not used in describing any of the technical information in the main body of the report. We don't think the past history of redevelopment blocks is a concept that needs to be described for this technical memorandum. If you feel you must keep a reference to them, you could include one sentence like: "The RODs describe redevelopment blocks that refer back to the 1997 Redevelopment Plan. The Redevelopment Blocks are shown on figures in Attachment(s) # and #."
5. All references to redevelopment plans need to be updated to the current 2010 Redevelopment Plan. Please include a reference to the 2010 Redevelopment Plan. Please see our edits to Section 2.0.

Specific Comments

- 1. Table of Contents (p. ii):** The TOC has Section 5.7 titled “Laboratory Analysis of Soil Gas and Air Samples”; the section heading in the text (p. 5-9) is the same. Both are in error. Ambient air sampling was removed from the scope of working during discussions on the Work Plan. Please correct these two headings accordingly.
- 2. Section 1.1, Project Objectives, first paragraph:** Recommend revising the first sentence from “...reduce, expanded, or eliminated from prior ARIC designation” to “...reduce, expanded, or eliminated from **current soil gas** ARIC designation.”
- 3. Section 1.1, Project Objectives, first paragraph, third sentence:** Please delete this sentence “Initially, the ARIC will include all of Parcel G.” It appears to be a sentence copied from the Parcel G ROD or RD and doesn’t fit in this paragraph.
- 4. Section 1.3, Report Organization:** The text describing the contents for Section 5.0, Field Activities mentions “air/soil gas collection”; please remove the word “air”, as no ambient air sampling was performed.
- 5. Section 1.3, Report Organization:** The text describing the contents for Section 8.0, Conclusions reads, “This section presents the conclusions drawn regarding the indoor air quality within Buildings 163 and 163A.” No indoor air sampling was performed as part of this work; please correct this text.
- 6. Section 2.2, Background:** The text in Section 1.0 provides the reference for the document in which the “SGALs were developed”; please provide a similar reference here for the document in which the COPCs for soil gas were identified, which are listed here.
- 7. Section 2.3 HPNS parcels, first sentence:** Please end the sentence after “groundwater remedial units”. Please delete “and redevelopment blocks.”
- 8. Section 2.3 HPNS parcels, second paragraph, starting with the fourth sentence:** Your recitation of the sequence and meaning behind BCT decisions is incorrect. You are also attempting to discuss redevelopment blocks which, as discussed in our general comment, you do not need to discuss. You are also making reference to the outdated 1997 Redevelopment Plan. Please replace all wording from the fourth sentence on as follows:

In the early 1990’s, the BCT established a grid system for use in the feasibility studies. This grid system facilitated statistical calculation of potential risks from soil and groundwater contamination for future land use scenarios. The grid sizes used for the feasibility studies were 50 x 50 foot grids for residential and 150 x 150 foot grids for industrial. These grid sizes correspond with many single family home and smaller business district lot sizes that exist throughout San Francisco. In 2010, during the development of the soil gas sampling procedures and understanding the characteristics of soil gas, the BCT accepted the Navy recommendation of a one-acre grid size as being the smallest reasonable grid for characterizing and

accessing risk from soil gas. This grid size also correlates well with the current San Francisco Redevelopment Agency (SFRA) development plans for the Shipyard that mostly include large footprint buildings on large blocks. The SFRA 2010 Redevelopment Plan describes the Land Use Districts where these buildings are planned to be located. The SFRA 2010 Redevelopment Plan also describes the uses allowed within each Land Use District.

- 9. Section 2.4.1 Parcel B, first paragraph, second sentence:** The phrase “to the west by public lands” seems inaccurate. There is a paper street and a very small portion of a real street (Earl) immediately adjacent to Parcel B and a shoreline park along the shoreline. The land west of the paper street is private property. In addition, the paper street is fairly inaccessible to the public. Since it isn’t an easily accessible public area right now and the land west of it is private land, we prefer that the description in these documents state that the area is “mostly private.” Please change the phrase “to the west by mostly private lands.”
- 10. Section 2.4.1 Parcel B, first paragraph, last sentence:** Please rewrite as follows: “According to the SFRA Redevelopment Plan (SFRA 2010), Parcel B includes the majority of the Shipyard North Residential District and some of the HPS Shoreline Open Space District.”
- 11. Section 2.4.2 Parcel D-1, second paragraph:** Please rewrite the paragraph as follows: “According to the SFRA Redevelopment Plan (SFRA 2010), Parcel D-1 includes some of the Shipyard South Multi-use District and some of the HPS Shoreline Open Space District.”
- 12. Section 2.4.3 Parcel G, second paragraph:** Please rewrite the paragraph as follows: “According to the SFRA Redevelopment Plan (SFRA 2010), Parcel G is designated as part of the Shipyard South Multi-use District.”
- 13. Section 2.4.4 Parcel UC-2, first paragraph, last sentence:** The reference to “public lands” on Parcel A might technically be correct because the land is owned by SFRA. However, public lands implies some element of public accessibility that does not exist at this time. We suggest rewording to “to the west by Parcel UC-1 and SFRA owned land (formerly Parcel A)”.
- 14. Section 2.6.1 [Previous Investigations] Parcel B, 5th paragraph (p. 2-7):** This paragraph states that the SVE system at Building 123 “remains in place in the event it is used during future remedial action”. The Remedial Design Package for Parcel B, dated December 2010, fully anticipates that this SVE system will be used during future remedial design; please rephrase accordingly.
- 15. Section 2.6.3 [Previous Investigations] Parcel G, 5th paragraph (p. 2-10):** This paragraph states, “The pickling tank is located within an area currently subject to radiological work and is scheduled for removal pending radiological clearance of the surrounding areas”. Note that the Final Completion Letter Report, Pickling Vault Removal, Hunters Point Shipyard, San Francisco, California, prepared by Tetra Tech EC, Inc. dated July 2, 2010 is available. Please rephrase accordingly.
- 16. Section 2.6.3 [Previous Investigations] Parcel G, last paragraph, last sentence (p. 2-11):** This sentence states, “The Navy excavated more than 47,000 cubic yards of material and relocated about 5,600 cubic yards off-site as low-level radioactive waste in adjacent Parcel G.”

The latter half of this sentence is incomprehensible. Was low-level radioactive waste relocated to Parcel G? Was low-level radioactive waste relocated to a location adjacent to Parcel G? Is this low-level radioactive waste still on-site or is it off-site? Please rewrite this sentence.

- 17. Section 5.3.4, Leak Test:** Please indicate which test method was used to analyze the collected soil gas samples for the presence of the leak check compound (LLC) 1,1-difluoroethane and if the LLC and COCs analyses were performed on the same collected soil gas sample. Tables 6-1, 6-3, and 6-4 indicate the reporting units for the LLC in $\mu\text{g/L}$ while the rest of the COC compounds are reported at $\mu\text{g/m}^3$. If the same collected soil gas sample was analyzed for both LLC and COCs, it appears that the test method used had significantly different reporting limits (e.g. $10,000 \mu\text{g/m}^3$ [$10 \mu\text{g/L}$] for LLC and 10 to $50 \mu\text{g/m}^3$ for COCs). Please double-check these units and number and then revise tables and text as needed to use consistent units throughout the report.
- 18. Section 5.3.6, SUMMA Canister Sampling, bullet numbers 6 and 7:** Please verify the unit on the final summa canister pressure. The text indicates that the canister sampling took place until a pressure of -2 to -6 inches of water (in- H_2O) remained in the canister. Typical summa canisters are provided by the laboratory with a pressure of -25 to -30 inches of mercury (in Hg). Typical pressure gauges provided by the laboratory to monitor the remaining pressure in the canister during sampling have a typical range of -0 to -30 in Hg. A remaining pressure of -2 to -6 in- H_2O would equate to -0.15 to -0.44 in H_2O , a reading not easily accomplished with a typical pressure gauge with gradation of -0 to -30 in Hg.
- 19. Section 5.4, Soil Sampling for Geotechnical Testing, last paragraph, last sentence (p. 5-9):** The last sentence states, “Where consistent, the data were considered to be representative of that soil type.” Please explain what parameters were evaluated and how comparable they needed to be in order to determine that two sets of data were “consistent” and provide an illustrative example. Please also explain what values were used if the data was deemed to not be consistent and provide an illustrative example.
- 20. Section 5.9, Electronic Data:** With the consistent, repeated use of the word “will”, it appears that both paragraphs in this section were copied verbatim from the Work Plan/SAP. Please rewrite this section to describe the procedures that were actually followed; presumably, the past tense applies to all activities. Please also discuss deviations from the SAP, if there were any.
- 21. Section 5.11, Data Reduction, second paragraph, first bullet item:** The first and last sentences of the first bullet appear contradictory. The bullet begins with, “Data that are R-qualified (rejected) during the data validation process were eliminated from consideration.” This is followed by an explanation of the “R” qualifier, and then the bullet concludes with, “No data derived by this assessment were R-qualified.” Please rewrite to clearly state whether or not there were any R-qualified data.
- 22. Section 6.1, Deviations from the SAP, second bullet:** The first sentence states that glass syringes “were immediately wrapped in a paper towel instead of foil after a soil gas sample had been collected”. Please explain why this change was made and what, if any, effect this may have had on the sample. Please consider whether or not this change in procedures should be carried through to the next round of soil gas sampling on other parcels.

- 23. Section 6.3, Onsite Analytical Results, third paragraph:** This paragraph states that the purge volumes used during sampling were as follows: Parcels B and UC-2 – three purge volumes, and Parcels G and D-1 – one purge volume. However, Tables 6-1 through 6-4 indicate various purge volumes for samples with similar depths. Purge volumes for samples collected in Parcel G for the 5-foot deep samples ranged from 231cc to 777cc, while in Parcel B for similar depth samples the purge volumes were mainly 333cc. If the 333cc represents three purged volumes, then it appears that the purged volumes for Parcel G represent almost a 7x purge volume. Please clarify or reconcile the information presented in the text and the tables.
- 24. Section 6.3, Onsite Analytical Results, fifth paragraph, last sentence:** This sentence states that, “The occurrences of relatively high chloroform in soil gas were found at..., and potentially one location in IR Site 26 (IR26B010).” Typically, a result either is or is not considered “relatively high”. Please explain why this last occurrence is qualified as “potentially”.
- 25. Section 6.3, Table 6-6:** Table 6-6 presents the same information as is presented in Table 6-5. Please revise Table 6-6 to include the analytical results for Parcel D-1.
- 26. Section 6.4, Offsite Analytical Results, last paragraph (p. 6-8):** This paragraph notes that results of the 12 VOC verification samples are presented in various tables along with results from the onsite laboratory. Please compile the results for all of the dual samples into a single, separate table and present the calculated percent difference between each pair of samples as well as the average, i.e., the “about 30% variance” discussed in Section 8.0, Conclusions.
- 27. Section 7.0, Human Health Risk Assessment, first paragraph:** A statement clarifying that the HHRA is limited to an evaluation of indoor air risk via the vapor inhalation pathway and that other exposure pathways and receptors were *not* considered should be included. This is noted in Section 7.1, page 7-2, paragraph 2, but should be presented at the very beginning. There should also be a reference back to Section 2 where the COPCs are listed.
- 28. Section 7.0, Human Health Risk Assessment, first paragraph, fourth sentence:** This sentence is drawn out and confusing; please consider rewriting to make it clearer.
- 29. Section 7.0, Human Health Risk Assessment, first paragraph, sixth sentence:** An ARIC cannot be “resized” based on, for example, a reduction in plume size or based on groundwater or soil data; it can only be changed based on additional, future soil gas sampling data. Although a reduction in the aerial extent of a VOC plume could, over time, lead to a reduction in VOC concentrations in soil gas, groundwater monitoring data should not be used as a sole basis for resizing an overlying ARIC. Please rewrite this sentence to make it clear that, although future changes in site conditions may allow a given soil gas ARIC to be re-sized or even eliminated, only soil gas data can be used to substantiate a change in ARIC configuration.
- 30. Section 7.1, Conceptual Site Model, first paragraph:** Please refer the reader back to the appropriate previous document(s) for the comprehensive CSM and then discuss which portion of that CSM is relevant to this document and why it is appropriate to limit the assessment to exposures to indoor air only (i.e., not include ambient air).

- 31. Section 7.2.1, Source VOC Concentrations, third sentence:** The current Cal/EPA advisory on active soil gas investigations states that sampling at less than 5 ft bgs is not recommended because of the possibility of barometric pressure effects and ambient air breakthrough. Please provide some discussion of the types of circumstances that necessitated the collection of samples from depths shallower than 5 ft bgs, and then discuss where appropriate later in the text what effect, if any, this deviation from recommended practice may have had on the data collected.
- 32. Section 7.2.2, Derivation of Soil Gas Action Levels, fourth paragraph, fourth sentence:** This sentence discusses the various values of “alpha” and their sources. Please note that USEPA guidance gives screening level residential alphas of 0.1 for shallow soil gas (<5 ft bgs), 0.01 for deep soil gas (>=5 ft bgs), and 0.001 for groundwater. The guidance does not provide any commercial attenuation factors. Since the soil gas samples collected at the site are a combination of shallow and deep, the most conservative applicable alpha would be 0.1 according to USEPA guidance. Please verify that the majority of the samples collected are deep (>= 5 ft bgs) and state so in the text; in this case using 0.01 for residential screening would be reasonable. However, if the majority of the samples are shallow (<5 ft bgs), then a change to 0.1 is probably warranted.
- 33. Section 7.2.2, Derivation of Soil Gas Action Levels, fourth paragraph, last sentence:** We suggest rewording this sentence to “highest vapor intrusion *potential*”.
- 34. Section 7.2.3, Estimation of Cancer Risk and Noncancer Hazard, second paragraph, last sentence:** Recommend using the term “unlikely” instead of “inconsequential”.
- 35. Section 7.2.4, Tier 1 Screening-Level Results for the Residential Exposure Scenario, first paragraph, first sentence:** This sentence discusses the cumulative cancer risk estimates. It appears that the non-detects were not included in the calculation of cumulative risks. The standard approach would be to develop a list of COPCs and then include all COPCs that were not detected in the risk calculation by using a surrogate concentration (e.g., one-half the detection limit). A sound justification for not following the standard approach needs to be provided; otherwise, the calculations should be rerun in accordance with the standard approach. Also, the parenthetical states that sample IR33SVI05-4.5 had no detections and was re-sampled; please state the results of the re-sampling.
- 36. Section 7.3, Grid-Specific Assessment:** Other parameters that should be specified in the text, along with the basis for the selection of the value selected for each parameter, are as follows:
- Soil Temperature
 - Slab on grade or basement structure
 - Floor thickness
 - Soil-building pressure differential
 - Enclosed space height
 - Floor-wall seam crack width
 - How was soil vapor permeability calculated, by soil type or user defined? The DTSC default parameter is shown in Appendix F.
 - How was flow rate into building calculated? The DTSC default parameter is shown in Appendix F.

- How was crack-to-total area ratio calculated, using DTSC assumption? The DTSC default parameter is shown in Appendix F.
 - How was building ventilation rate calculated, using DTSC assumption? The DTSC default parameter is shown in Appendix F.
- 37. Section 7.3.1.1, Source Term Concentrations:** There should be a discussion of the likelihood of NAPL being present.
- 38. Section 7.3.1.1.2, Chemical Fate and Transport, second paragraph, last sentence (p. 7-7):** Regarding the building size: If you follow DTSC guidance and adjust the soil gas entry rate for future building size, then the size of the building does not affect the attenuation factor. Since building height is an important parameter affecting the attenuation factor, this sentence should be revised to say that the building height is conservative.
- 39. Section 7.3.1.1.2, Chemical Fate and Transport, third paragraph (p. 7-7):** The paragraph indicates that 60 samples exceeding Tier I risk-screening criteria were used to calculate the α value (attenuation factor). However, Section 7.2.4, last paragraph, indicates that 84 samples, representing 60 sampling locations, exceeded the Tier I risk screening criteria. Please clarify if of the 84 samples that exceeded the Tier I risk screening criteria, only 60 samples were used for the Tier II evaluation and whether those 60 samples represent the highest Tier 1 risk screening criteria exceedances for their respective sampling locations.
- 40. Section 7.3.1.1.2, Chemical Fate and Transport, fourth paragraph, last sentence (p. 7-7):** The statement regarding “low moisture conditions (and corresponding greater potential for vapor intrusion)” is speculative since only one round of geotechnical sampling was performed; one could equally speculate that the fact that the geotechnical samples were collected near the capillary fringe means they represent high moisture conditions as compared to shallower depths. We suggest deleting this last sentence
- 41. Section 7.3.1.1.2, Chemical Fate and Transport, seventh paragraph (p. 7-8):** The paragraph states, “...yielding residential alpha values in the 1×10^{-3} to 1×10^{-4} range”; there are several alpha values that are outside of the stated range (e.g., IR Site 26). Please revise the text accordingly.
- 42. Section 7.3.2, Toxicity Assessment:** The toxicity assessment should also provide a qualitative description of toxicities of the COPCs. This section only discusses the source of the numerical toxicity parameters.
- 43. Section 7.3.3.1.2, Non-Cancer Hazard Characterization Methods:** Please define and describe what a chemical-specific RfC is.
- 44. Section 7.3.3.2.1, Residential Scenario, last sentence:** This statement assumes that the soil gas sampling results from each grid are representative of the entire grid block; please state so in the text and refer the reader back to the original discussion of sampling rationale (e.g., section in SAP) that backs up the reasonableness of this assumption.

- 45. Section 7.4, Uncertainty Assessment, Exposure Assessment Uncertainties (p. 7-13):** The default JEM building area should be compared to local documented mean building sizes for both residential and commercial spaces to put the conservatism of the default parameter into perspective.
- 46. Section 7.4, Uncertainty Assessment, Toxicity Assessment Uncertainties (p. 7-13):** There is no discussion on how the toxicity uncertainties affect the calculated risk. A comment on whether the resulting risks are conservative or not should be added. Also, a description of how the DTSC and EPA toxicity parameters affect the results should be added.
- 47. Section 7.4, Uncertainty Assessment:** To complete the discussion on uncertainties, please perform a sensitivity analysis on the HHRA results, in conformance with current practice.
- 48. Section 7.5, HHRA Summary and Conclusion, second and third paragraphs:** The text states that only those grids with Tier II exceedances of greater than 5×10^{-6} should remain as ARICs and goes on to state that those grids with a Tier II risk between 1×10^{-6} and 5×10^{-6} pose a “minimal risk” which can be “controlled or mitigated by risk management, engineering controls, or planning without further remedial actions”. The statement that some type of control/mitigation is required to reduce the risk makes the grid an area requiring institutional controls (e.g., engineering controls). Therefore, all grids exceeding residential 1×10^{-6} cancer risk should remain as ARICs. The Figures 7-2 through 7-4 reflect this interpretation. Please reword this paragraph to state that any grid with greater than 1×10^{-6} is an ARIC as shown on the figures. Remove all discussion about risks between 1×10^{-6} and 5×10^{-6} .
- 49. Section 8.0, Conclusions, fifth bullet (p. 8-2), second sentence:** Delete this sentence please.
- 50. Section 8.0, Conclusions, sixth bullet (p. 8-2):** This bullet states that two grid blocks substantially exceeded the de minimis threshold by an order of magnitude and “should remain as residential ARICs pending evaluation of final remedies”. It is the City’s understanding that once a block has been designated an ARIC, this can only be changed if and when additional soil gas sampling shows that risk levels have dropped below the 1×10^{-6} excess cancer risk threshold. We therefore request that the phrase “pending evaluation of final remedies” be struck from this sentence. Once you’ve deleted this phrase you can combine the fifth and sixth bullets and just state that there are 11 grids that are designated as ARICs.
- 51. Section 9.0, Recommendations, fourth bullet, last sentence (p. 9-1):** This sentence states that “minor engineering design changes can be planned that would eliminate the need for maintaining ARICs on marginally effected[sic] grid blocks (e.g., slightly increasing ventilation air exchange rates, door and window size or number, or installation of improved vapor barriers)”. Please delete this sentence. As stated in a previous comment, it is the City’s understanding that once a block has been designated an ARIC, this can only be changed if and when additional soil gas sampling shows that risk levels have dropped below the 1×10^{-6} excess cancer risk threshold.
- 52. Tables 6-1 through 6-4:** These tables have different Residential SGALs than those presented in the SAP. For example, the Project Action Limit for toluene presented in the SAP is $5.21\text{E}+05 \mu\text{g}/\text{m}^3$ ($521,000 \mu\text{g}/\text{m}^3$) and the one shown in Tables 6-1 through 6-4 is $5,230,000 \mu\text{g}/\text{m}^3$. Please verify all presented SGALs (values and units) in all tables and correct as necessary.

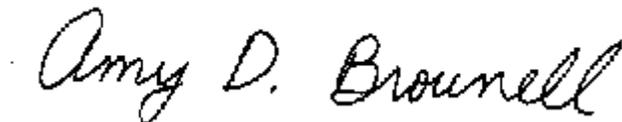
- 53. Table 6-9, Soil Gas Analytical Results – Parcels B, D-1, G, and UC-2, PAHs and Pesticides:** This table presents SGALs in scientific notation (E notation) while Tables 6-1 through 6-4 do not. Recommend editing for consistency. Please note that the SGALs presented in the SAP were all in scientific notation format. Furthermore, Table 6-9 does not present the reporting limits for PAHs Chrysene, Benzo(b)fluoranthene, or hexachloro-ethane and only shows ND for the results. Reporting limits should be provided for the aforementioned PAHs as they have SGALs.
- 54. Table 7-2:** In order to avoid confusion, the units should be specified for soil moisture content. Since the JEM uses volumetric moisture content and not gravimetric moisture content, the table should be presenting volumetric results and show the units as cm^3/cm^3 .
- 55. Table 7-3:** The ATnc should be equal to the ED (30); please verify and revise the table accordingly.
- 56. Figure 7-1:** The figure should note that the conceptual site model is limited to an evaluation of indoor air risk via the vapor inhalation pathway and should state that other exposure pathways and receptors were not considered.
- 57. Figures 7-2 through 7-5:** The tables currently show a total of 52 Tier I screening evaluation exceedances (e.g., $>1.0 \text{ E-06}$) results and the subsequent Tier II screening evaluation exceedances. However, the text indicates that there were 60 sample locations with Tier I exceedances. For example, soil vapor sample 1001N1E (Parcel B, Grid H5) has a Tier I evaluation result of 1.3E-06 , but the result is not presented, and Tier I and Tier II evaluation results for sample IR10SG047 and IR10SV101 (both exceeding residential Tier II evaluation) are not presented either. Please add these and any other missing Tier I and Tier II exceedance results.

Minor Comments

- 1. Section 4.1, Soil Gas Sampling Locations, first sentence (p. 4-1):** Please change “rational” to “rationale”, consistent with the chapter heading (4.0 Investigation Sampling Rationale).
- 2. Section 4.1, Soil Gas Sampling Locations, ninth paragraph, third sentence (p. 4-3):** This sentence reads, in part, “soil gas samples from the prescribed Tier II sampling locations... would be collect better determine the extent of these COCs in soil gas.” Please make the necessary corrections.
- 3. Section 4.2, Geotechnical Sampling Locations, first paragraph, last sentence (p. 4-4):** Please change “suit” to “suite”.
- 4. Section 5.1, Land Survey, third sentence (p. 5.1):** Please insert the word “as” between “such” and “inaccessible”.
- 5. Section 5.3, Soil Probe Installation and Sampling, first paragraph, second sentence (p. 5-2):** Please change “finale” to “final”.

6. **Section 5.6, Field Documentation, second sentence:** Please insert “being” between “before” and “transported”.
7. **Section 6.1, Deviations from the SAP, third bullet, second sentence:** Please replace “preceded” with “began”.
8. **Section 6.3, Onsite Analytical Results, first paragraph, second sentence:** Please change “experienced” to “experience”.
9. **Table 6-2, Soil Gas Analytical Results - Parcel D-1, VOCs:** This table is missing from the pdf.
10. **Table 6-2, Soil Gas Analytical Results – Parcel D-1, VOCs and Table 6-4, Soil Gas Analytical Results – Parcel UC-2, VOCs:** Please re-size the date column on both of these tables so that the dates are visible when the tables are printed.
11. **Tables 6-1 through 6-4:** Please clarify in the footnotes, for example, that the samples submitted for off-site analysis are identified by “OS” in the sample number.
12. **Figure 7-3:** Current arrow for evaluation results for sample IR08B046 points to the parcel boundary and not the sample location. Please revise accordingly.
13. **Figure 7-3:** The posted vapor intrusion residential exposure estimates obscures the sample location name for IR70MW04A. Please consider repositioning if possible.

Sincerely,



Amy D. Brownell, P.E.
Environmental Engineer

cc: Melanie Kito, Navy
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