

Arc Ecology

833 Market Street ♦ San Francisco, California 94103

phone: 415 495 1786 ♦ fax: 415 495 1787 ♦ e-mail: lealoizos@mindspring.com

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Mr. Keith Forman
Department of the Navy
Naval Facilities Engineering Command, Southwest Division
1220 Pacific Highway
San Diego, CA 92132-5190

RE: Draft Parcel E Nonstandard Data Gaps Investigation Landfill Lateral Extent Evaluation, May 15, 2003

Dear Mr. Forman:

Arc Ecology has reviewed the Landfill Lateral Extent Evaluation, dated May 15, 2003. As it is written, we do not feel that there is enough information in the report to support the conclusions made about the extent of the landfill. The following comments identify areas requiring better definition or explanation before any conclusions about landfill extent can be drawn.

1. The landfill on Parcel E is one of the greatest areas of concern on the Shipyard for Bayview Hunters Point residents. The lack of concrete information regarding soil contamination on Parcel E and the exact contents of the landfill has long been a source of anxiety in the community. Therefore, we were pleased to see that the Navy chose to take soil samples while conducting the lateral extent evaluation. Why are the results of this sampling not included in this report? In the interest of keeping the community informed early and often, we urge you to include these results in the draft final version of the document.
Furthermore, delineating the landfill purely on visual characteristics is insufficient. Soil contaminant levels should also be a factor in determining the boundaries of the landfill. According to the document, these data will be presented in the RI report for Parcel E, which is currently scheduled for release in May 2005.
2. It is unclear what the difference is between landfill waste and demolition debris used as fill material. In Section 3.1, landfill waste is said to consist of wood, plastic, metal, concrete, bricks and gravel fill. The demolition debris described in this section also contains concrete, wood, gravel, and bricks. This makes it difficult to understand how some of the conclusions about the landfill boundaries were made. For example, test pit WE09 was recorded as having bricks in the northern section, however it was determined that the landfill ends there. Similarly, WE19C on the western perimeter is described in the log as having 10% debris yet the text says no waste was observed (Section 3.2.4). Please clarify how the distinction is made between landfill wastes, debris and fill. Photographs supporting these descriptions would be helpful.
3. The lack of documentation about where demolition debris from former NRDL buildings was discarded (e.g., Bldg. 830) is another source of anxiety in the community. Some speculate

that the debris was buried in the Industrial Landfill on Parcel E. Were any of the test pits, particularly those containing demolition debris, sampled for radioisotopes?

4. Historical data from borings and wells were used in conjunction with the recently dug test pits to help define the extent of the landfill. While the numbers of the borings are given, there is no reference to where this information is documented, nor is the information included in the report. Please provide either the necessary references or the actual boring logs in the report.
5. There are several inconsistencies between the text, the test pit logs and the associated photographs. For example:
 - WE15: The test pit log says depth to 10 ft but only records data for first foot.
 - WE01: Photograph 6 shows debris but the test pit log does not. Why was no step-out done beyond the fence-line?
 - WE02B: The text says that “minimal” amounts of landfill waste were found in the test pit, and therefore the landfill conveniently ends at this point, just at the fence line. However photograph 7 shows a substantial amount of refuse. Why was no stepout done beyond the fence line?
 - WE02A: Purple staining is shown in photograph 8 but is not mentioned in soil description of the test pit log.
 - WE18D: What is blue liquid at bottom of the test pit shown in photograph 4?Please correct these and any other inconsistencies that exist between the photographs, test pit logs, and the text.
6. The following items require more clarification:
 - a. Are the ppm readings in the test pit log soil descriptions referring to methane levels? For example, the soil description for log WE22 reads: “1 inch sand; below 2 inches light gray saturated clay (Bay Mud); 80 ppm at mouth, 20 to 40 ppm ambient”. Please list more clearly what these measurements are referring to.
 - b. Eastern Perimeter:

The historical data used to draw the conclusions for the Eastern perimeter of the landfill should be included in this report, or at the very least referenced. As it is currently written, the reader has no idea where the stated boring logs were taken (they are not shown in the figures) nor where these data are documented.
 - c. Northern Perimeter:

Due to the heterogeneous nature of landfills, it is likely that a boring could be dug in the center of the landfill yet come out showing no debris. Therefore, it is risky to draw boundary lines from single borings at the fence line that show no debris. Furthermore, without having dug any test pits on the opposite side of the fence, the Navy will have a difficult time convincing the community that waste stops at the fence line.
 - d. Southern Perimeter:

It is unclear how the southern boundary line, west of WE16, was determined as there are no test pits between WE16 and WE17F. Please provide the information used to draw the boundary line in this area.

We appreciate the opportunity to review and comment on this document. Please feel free to contact me should you have any questions.

Regards,

Lea Loizos
Staff Scientist

Cc: Michael Work, US EPA
Chein Kao, Department of Toxic Substances Control
Julie Menack, Region Water Quality Control Board
Amy Brownell, City of San Francisco, Department of Public Health
Lynne Brown, RAB Community Co-Chair