

Arc Ecology

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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 Final First Five-Year Review of Remedial Actions Implemented at Hunters Point Shipyard, September 22, 2003

Dear Mr. Forman:

Arc Ecology has reviewed the Draft Final First Five-Year Review of Remedial Actions Implemented at HPS, dated September 22, 2003. We have a few comments and suggestions:

1. The steps that will be taken to reach the ROD Amendment need to be better explained. There is brief mention of the Technical Memorandum in preparation for the ROD Amendment; this document should be better explained, including what it will address, how it will help lead to a ROD Amendment and the level of community participation that will be solicited.
2. Throughout the document, statements are made about how the outstanding issues will be addressed. (E.g., Section 6.1.4: "It is the Navy's position that background levels of ambient metals in soil are more variable and higher than originally estimated. The soil remedy will either require an institutional control to prevent exposure to soil or modifications to soil RAOs.") Conclusions about how remaining problems will be resolved are not necessary. Such statements should be included in the Tech Memo in support of the ROD Amendment. In the Five-Year Review, it would be more appropriate to simply state the remaining issues and that they will be resolved through a ROD amendment. Please remove any conclusions about how the remaining problems will be addressed.
3. Figure 4 is not mentioned until Chapter 7 when it is used to show the monitoring well locations and different types of monitoring wells. However the map contains quite a bit of information about other site features, such as excavation locations and the tidally influenced zone, and is a good reference map for those who are not as familiar with the site. This map should be referred to earlier on in the document, perhaps in Chapter 4 to supplement the discussion on the background of the area.
4. Section 4, pg. 10 states, "IR-06 will be evaluated more thoroughly in future five-year reviews that follow a Parcel C ROD." Since Parcel C does not yet have a ROD in place, the conclusion drawn from this statement is that there is currently no cleanup plan for IR-06. Would it not be more correct, therefore, to say that IR-06 will be addressed under the Parcel C ROD? Was the decision to include IR-06 in the Parcel C ROD agreed upon by the BCT in an ESD? If not, should it not be agreed upon in the ROD amendment?

5. Section 6.1.4 talks about the current activities planned by the Navy for Parcel B. We suggest including a figure showing the location of these projects, as it may not be so obvious to the average reader.

Thank you for giving us the opportunity to comment on this document. Please feel free to contact me if you have any questions.

Sincerely,

Lea Loizos
Staff Scientist

Cc: Michael Work, US Environmental Protection Agency
Chein Kao, Department of Toxic Substances Control
Julie Menack, Region Water Quality Control Board
Amy Brownell, City of San Francisco, Department of Public Health
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