

# Arc Ecology

*Environment, Economy, Society, & Peace*

November 21, 2003

Keith Forman  
Naval Facilities Engineering Command  
Southwest Division  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101-8517

**Re: Draft Work Plan for Phase III Soil Vapor Extraction Treatability Study, Parcel B, Hunters Point Naval Shipyard, San Francisco, California, dated September 26, 2003**

Dear Mr. Forman:

Arc Ecology has reviewed the Draft Work Plan for Phase III Soil Vapor Extraction Treatability Study, Parcel B, Hunters Point Naval Shipyard, San Francisco, California, dated September 26, 2003. This work plan describes a soil vapor extraction (SVE) treatability study at Building 123 on Parcel B that is an expansion of a previous SVE treatability study at the same location.

The continued expansion of the soil vapor extraction treatability study to extract trichloroethene (TCE) from beneath Parcel B Building 123 suggests that the Navy is actively using SVE as a remedy for TCE contamination at this location. While SVE may be a viable remedy to address the TCE contamination below Building 123 and to avoid TCE release into the atmosphere during soil excavation, the Navy would be implementing significant changes to the remedy identified in the October 7, 1997, *Hunters Point Shipyard, Parcel B Record of Decision* (ROD) without providing opportunity for community input on a new remedy for TCE contamination at this location.

The original remedy was selected by the Navy with input from state and federal regulators as well as the Bayview/Hunters Point community. If the Navy uses the SVE treatability study as a full-scale remedial action, the community would be informed only retroactively of the new remedy. Is the Navy using the treatability study to remedy TCE levels to below action levels below Building 123? If so, why is the Navy doing this in a treatability study rather than as a new remedy put in place through the upcoming Parcel B ROD amendment process, which would allow for public input?

Arc Ecology appreciates having the opportunity to review this document. If you have any questions, I can be reached at (415) 643-1190 or [Cian\\_Dawson@mindspring.com](mailto:Cian_Dawson@mindspring.com).

Sincerely,

Cian B. Dawson  
Staff Scientist

Cc (electronic): Michael Work, U.S. Environmental Protection Agency, Region IX  
Chein Kao, California Department of Toxic Substances Control

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