

Arc Ecology

Environment, Economy, Society, & Peace

March 26, 2004

Keith Forman
Naval Facilities Engineering Command
Southwest Division
1230 Columbia Street, Suite 1100
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RE: Draft Action Memorandum Time-Critical Removal Action for the Parcel D Soil Excavation Sites, Hunters Point Shipyard, San Francisco, California, dated February 24, 2004

Dear Mr. Forman;

Thank you for providing Arc Ecology with the opportunity to review the *Draft Action Memorandum Time-Critical Removal Action for the Parcel D Soil Excavation Sites, Hunters Point Shipyard, San Francisco, California*, dated February 24, 2004. We appreciate that the Navy has solicited public comment on both the action memorandum and the work plan for this time critical removal action (TCRA).

We were disappointed, however, to learn that the work on the removal action is beginning before the end of the public comment period. While it was explained at the public meeting that the work schedule was created in part to ensure protection of the burrowing owl, the Navy has known about the owl since October. It would seem that the public comment period could have begun earlier to allow all public comments to be received before the work began. Furthermore, this is not explained anywhere in the action memorandum, so those submitting comments may not be aware that some of the work will be complete before their comments are even read. As a result, despite perhaps good intentions, the community is left feeling as though this action is merely pro forma and there is no incentive for community involvement when the message being given is that their comments will have no effect on the project plans. It is our sincere hope that this type of situation will be avoided in the future.

In addition, we are concerned that this is an inappropriate use of a TCRA. Neither an immediate risk to human health and the environment, nor the potential for such risk, have been proven in this report. With the Parcel D draft final Feasibility Study scheduled for release in 6 months, it is unclear why the Navy finds it necessary to complete these soil excavations at this time. We are concerned that the Navy is using the TCRA to address all of the known remaining soil contamination before the feasibility study.

Our specific comments and concerns are below.

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1. Overall, better justification is needed for this TCRA. Looking at the referenced documents, from where much of the data comes, many of the IR sites currently being addressed were declared as needing no further soil remediation after the Risk Management Review process (IR Sites 17, 32, 33, 34, 35, 38, 39, 68, 69, and 70). The Revised Draft FS finds that after the 2001 TCRA, no further action is required for the remaining soil at Parcel D. The action memorandum for the current TCRA does not explain why these conclusions have since changed though the same data set is being used.
For example, soil excavation site DM AT22 in IR-09 is targeted for removal due to the elevated level of lead (920 mg/kg). In the Revised Draft FS, the following conclusions are drawn for the same area: “This sample [IR09B030] was evaluated during the RMR and found to require no further action because the lead concentration was below the PRG (1,000 mg/kg). However, the PRG has recently been revised to 750 mg/kg. Because the sample was collected at a depth where exposure is limited and because the lead concentration in the sample only slightly exceeded the revised PRG, the isolated lead detection at boring IR09B030 is not considered to pose an unacceptable risk to human health.” Please explain why this conclusion has changed such that a TCRA is required to address the contamination.
2. The title of the document is misleading; it addresses only the excavation of soils in Parcel D whereas there will also be stockpile removal occurring in both Parcels D and E. For clarity, I suggest changing the title to include the stockpile removal from Parcels D and E.
3. Risks from “ambient” metals:
Section 1, page 2, points out that cleanup goals for ambient levels of metals are still being negotiated and that “This remedial action therefore does not target soil that contains metals at ambient concentrations.” This sentence is a bit confusing. How can we assume that the metals in these areas are at ambient concentrations when the ambient levels are still being negotiated? I suggest rewording the sentence to state simply that the remedial action does not address metals other than lead and chromium VI because ambient levels of metals are still being negotiated.
4. Cleanup goals:
 - a. The cleanup goals proposed for this TCRA were calculated using the exposure factors and general risk assessment methodology from the Parcel D Draft Revised Feasibility Study (FS). Has the BRAC Cleanup Team (BCT) approved the risk assessment methodology used in the draft revised FS?
 - b. Section 1, page 2, states, “The cleanup goals for this TCRA (referred to as the HPS PRGs) are concentrations in soil that correspond to an excess lifetime cancer risk of 1×10^{-6} or a non-cancer hazard quotient of 1.” Please clarify if the cleanup goals are chemical specific or if the goals reflect the cumulative risk from all contaminants in the exposure area grid.
5. Threats to the Environment:
In the discussion of groundwater on page 9, it states, “Because the groundwater at Parcel D is not considered a potential source of drinking water, the threat to potential contamination of drinking water supplies is not present (RWQCB 2003).” The Regional Water Quality Control Board memo that is referenced states that the A-aquifer groundwater on Hunters Point

Shipyard is exempt; it does not specify groundwater on Parcel D. Please revise the language in the AM accordingly. If the A-aquifer is the only aquifer present on Parcel D, than please specify this.

6. Removal Site Evaluation:

The report indicates that site 9-1 is located in the area of groundwater monitoring well IR09PPY1, where hexavalent chromium exceeds aquatic criterion. According to the Parcel D Draft Revised Feasibility Study, hexavalent chromium levels at IR09MW35A also exceed aquatic criterion. Why, then, is the soil around IR09MW35A not being included in this TCRA?

7. Proposed Action Description:

The proposed action description for area 9-1 states, “the extent of the excavation will be based on an assessment after samples have been collected of the potential threat to groundwater from chromium VI in soil” (page 10). What criteria are being used to determine the potential threat to groundwater from chromium VI? Concentrations of chromium VI in soils at area 9-1 are below HPS PRGs, according to page 3 of the AM. What, then, will be the cleanup goal for chromium VI?

8. Confirmation Sampling:

Please include a better description of the bottom samples that will be taken from the excavation areas. At the public meeting held on March 9th, the Navy confirmed that bottom samples will be taken from the excavations, however there is no mention of the bottom samples in the action memorandum. While this may be discussed in the TCRA work plan, a description similar to that given for the sidewall samples should be included for consistency.

9. Dust and Noise Control Measures:

- a. We are pleased to see that the Navy is acknowledging the need for rigorous dust control measures during the field work (page 11) as this is often a concern of the surrounding community. Will any air quality monitoring be done to verify the effectiveness of these measures?
- b. Members of the surrounding community have expressed concerns about trucks idling on the streets prior to the start of work at 7:30AM. Apparently, this has been a problem during work activities in the past, which raises the issue of both noise pollution and air quality for local residents. What measures will the Navy take to ensure that trucks reporting to work will not be idling outside the Shipyard before the start of work?
- c. We encourage the Navy to ensure that all tenants on Parcel D are informed of the excavation activities well in advance of the work so that they can plan accordingly.

10. Description of Alternative Technologies:

In discussing the rationale for choosing the excavation and off-site disposal alternative, the Navy states, “In addition, the public overwhelmingly supported off-site disposal alternatives.” (page 12) In what case did the public support excavation and disposal? Although the public may have supported this alternative in the past, the public’s support for remedies needs to be solicited on a site-by-site basis. It is not appropriate to assume that the

public will select a particular remedy without providing them with information on alternatives.

11. In the recommendations on Section 9, page 16, it is stated that this is the final selected removal action for the soil excavation areas at Parcel D. We cannot yet determine if this is the final action for these areas when final cleanup goals have not been approved and ambient levels of metals are still being negotiated. Indeed, in Section 1, page 2, it states, "Residual contamination left in soil will be evaluated in the Parcel D draft final revised feasibility study." Please correct this discrepancy to ensure that it is understood that this is not the final action for these sites.

Minor comments:

Section 1, Page 1, final paragraph: The reference given for the Parcel D TPH corrective action plan appears to be incorrect. I believe it should reference the Tetra Tech 2002b document.

Arc Ecology appreciates having the opportunity to review this document. If you have any questions about the comments, please contact me at (415) 495-1786 or lealoizos@mindspring.com

Sincerely,

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Staff Scientist

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