

Arc Ecology

Environment, Economy, Society, & Peace

June 1, 2004

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

Re: Draft Characterization Work Plan, Revision 0, Metal Debris Reef and Metal Slag Areas, Parcel E, Hunters Point Shipyard, San Francisco, California, dated April 19, 2004

Dear Mr. Forman:

Thank you for providing Arc Ecology with the opportunity to review the *Draft Characterization Work Plan, Revision 0, Metal Debris Reef and Metal Slag Areas, Parcel E, Hunters Point Shipyard, San Francisco, California*, dated April 19, 2004. Arc Ecology has the following comments on the document:

- 1) Section 2.4 *Parcel E Hydrogeology* states, "... groundwater was never observed to be percolating to the surface in the Parcel E shoreline area; therefore, groundwater is not discussed further in this document." This statement implies that, because groundwater is not seen at the surface, it is not impacted by the metal slag and metal reef areas. Runoff from precipitation events may transport contaminants from the metal slag and metal reef into the subsurface and the ground water. The groundwater in the metal slag and metal reef areas should be fully characterized to assess the impact of the metal slag and metal reef on groundwater and to assess the potential for migration of contaminants – metals and radionuclides, in particular – through groundwater.
- 2) Please provide additional information on previous metals sampling and analysis data from the metal reef and metal slag areas, as these data would be helpful in assessing the Navy's plans for characterization of the areas in question. Please include a figure showing the locations where soil samples were collected and analyzed for metals, indicating where samples exceeded HPALs and/or PRGs.
- 3) The work plan does not state when and where the results will be documented.
 - a. Please revise Section 5.5 and Figure 5-1 to include information on where the results of the metal slag and metal reef area characterization will be documented and when the Navy anticipates releasing those documents for regulatory and/or public review.

- b. How does this schedule relate to the anticipated Time-Critical Removal Action (TCRA) timeframe and public comment process? It will be important for the characterization results to be released and to have gone through regulatory review prior to the release of the related TCRA work plans.
- 4) The work plan descriptions for the land surface and marine surveys (geophysical, topographic, and bathymetric) indicate a significant potential variation in the lateral extent of the surveys (“100 to 250 feet beyond the toe of the shoreline slope,” “100 to 250 feet landward of the shoreline”). While it is understandable that the actual extent of the surveys may need to be determined in the field, it is not clear what criteria will be used by field personnel or supervisors to determine the extent of the areas being surveyed. Please revise the work plan to clarify how these decisions will be made.
- 5) The work plan does not provide enough information on the planned surface, borehole, and marine geophysical surveys for the reader to assess whether the work plans for these surveys are appropriate and sufficient to meet the stated objectives. Please revise these sections to provide more specific detail on the survey plans, including instrumentation and survey methods.
- 6) Descriptions of the plans for landside and marine geophysics mention decisions to be made based on comparison of field data to “background” readings. Please clarify for each instrument how and where “background” levels will be measured and the rationale for those choices.
- 7) Section 4.8 *Borehole Drilling Activities*:
 - a. Please revise Section 4.8 *Borehole Drilling Activities* to specify the criteria that will be used to cite boreholes used for geophysical surveys and/or sampling.
 - b. The work plan states that radiological screening of each boring location and its vicinity will be conducted prior to drilling. Please provide more information on what type of screening will be done and how the results of the screening will impact drilling and sampling decisions.
- 8) Section 4.8.2 *Soil and Sediment Sample Collection* states that soil removed from each boring will be screened with a high-sensitivity gamma scintillator detector. Will these samples be screened for overall gamma activity or will the energy of the gamma emissions and number of gamma emissions associated with each energy level be measured in order to identify the possible source radionuclides? Also, please revise the section to clarify how these field screenings will impact field work and/or sampling handling.

Minor comments:

- 9) Please check for any reference to TtEMI, 2003 and correct to the appropriate document (either TtEMI, 2003a or TtEMI2003b).
- 10) When will the *Internal Draft Parcel E Standard Data Gaps Investigation, Interim Data Analysis Report, Hunters Point Shipyard, San Francisco, California, dated December 10, 2003*, be available for public review?

- 11) Section 2.2.1 mentions a “survey conducted using a continuity meter to detect all metal near the ground surface.” Please provide a reference where these data and results have been documented.
- 12) Section 6.2. *Public Participation* states, “ The RAB held several meetings during the investigation and preparation of a Draft Action Memorandum.” Please revise the section to clarify what investigation and memorandum are being referred to.

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

Sincerely,

Cian B. Dawson
Staff Scientist

Cc (electronic):

Michael Work, U.S. Environmental Protection Agency, Region IX
Tom Lanphar, California Department of Toxic Substances Control
Jim Ponton, California Regional Water Quality Control Board, San Francisco Bay Region
Amy Brownell, City of San Francisco, Department of Public Health
Lynne Brown, RAB Community Co-Chair