

Arc Ecology

Environment, Economy, Society, & Peace

July 19, 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: IR-01/21 Landfill Remedial Investigation/Feasibility Study, Hunters Point Shipyard

Dear Mr. Forman:

Arc Ecology has come together with a coalition of organizations as *the Parcel E Landfill Working Group* to provide technical review and community support on the cleanup and reuse of the IR-01/21 landfill, Parcel E, of the Hunters Point Shipyard. We are pleased to see that the Navy has decided to make the IR-01/21 landfill a priority and that work towards a final remedy will begin this Fall. Our group is currently gathering resources and background information in preparation for our review of the remedial investigation/feasibility study (RI/FS) for IR-01/21.

As part of our initial work, we have reviewed the RI/FS outline provided at the May 12, 2004, IR-01/21 landfill storyboard meeting. Based on our review of the RI/FS outline, our background knowledge of the site, and our knowledge of related community concerns, we believe that there are several issues that the Navy must be sure to address through the RI/FS process:

1. The Navy should conduct an ecological risk assessment as part of the RI. Burrowing species, including a burrowing owl, have been seen in the vicinity of the landfill and on non-Navy property bordering Parcel E; therefore, it is reasonable to expect that these species will inhabit the open-space reuse planned for the current location of the IR-01/21 landfill. Even if containment is the chosen remedy, there may still be a risk to these species in the likely event that they breach the containment.
2. The Navy must fully consider the potential effects of the short- and long-term interruption of pumping at the sheet pile wall on the groundwater table and groundwater flow direction and rate. The Navy cannot ensure permanent, uninterrupted pumping in this area. If pumping were terminated intentionally or due to equipment failure for even a month, how would this change in groundwater flow affect the ability of contaminants from the landfill to enter the groundwater and migrate from the landfill to other areas of the site or into the Bay? How do these effects vary seasonally? The Navy must fully consider these issues when analyzing containment as a remedy, and provide data to support its conclusions.
3. The groundwater data collected by the Navy for the original Parcel E RI and subsequent data gaps investigations generally were collected prior to the recent termination of

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pumping at Pump Station A. The RI for the IR-01/21 landfill must fully address this issue and provide data to demonstrate how this change in the groundwater flow regime does or does not impact the vicinity of the landfill and the site conceptual model.

4. The Navy should conduct a quantitative risk assessment; knowledge of the contents of the landfill and associated health risks is required to adequately and accurately evaluate the true costs of excavation and off-site disposal of the current IR-01/21 landfill.
5. Please be sure that the cost analysis for the alternatives is thorough and includes the short- and long-term costs associated with managing the landfill.

We look forward to working with the Base Cleanup Team to achieve an appropriate remedy for the IR-01/21 landfill that is acceptable to all stakeholders. If you would like to discuss our questions further, please contact Lea Loizos at (415) 495-1786 or by email at lealoizos@mindspring.com.

Best regards,

Lea Loizos
Arc Ecology, 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
Maurice Campbell, RAB Community Co-Chair