



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

March 15, 2019

Derek J. Robinson, BRAC Environmental Coordinator
Department of the Navy
Base Realignment and Closure Program Management Office West
33000 Nixie Way, Building 50
San Diego, CA 92147

Re: EPA Non-Radiological Contamination Comments on the Responses to Comments from the U.S. Environmental Protection Agency on the Draft Five-Year Review for Hunters Point Naval Shipyard, San Francisco, California and the Redline Final Five-Year Review for Hunters Point Naval Shipyard, San Francisco, California, Received on March 4, 2019

Dear Mr. Robinson:

Attached are EPA's non-radiological contamination related comments on Responses to Comments (RTCs) from the U.S. Environmental Protection Agency (EPA) on the Draft Five-Year Review for Hunters Point Naval Shipyard, San Francisco, California and the Redline Final Five-Year Review for Hunters Point Naval Shipyard, San Francisco, California, received via email on March 4, 2019.

EPA comments relating to radiological contamination on these RTCs will be submitted by Ms. Lily Lee in a separate transmittal.

If you have any questions, please do not hesitate to call me at (415) 972-3681 or e-mail me at huang.judy@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Judy C. Huang".

Judy C. Huang, P.E.
Remedial Project Manager

cc:

Nina Bacey, DTSC (via email)
Tina Lowe, RWQCB (via email)
Amy Brownell, SFDPH (via email)
Stephen Banister, US Navy (via email)
Paul Stoick, US Navy (via email)

Review of the Responses to EPA Comments on the Draft Five-Year Review for Hunters Point Naval Shipyard, San Francisco, California, and the Redline Final Five-Year Review for Hunters Point Naval Shipyard, San Francisco, California, March 2019

1. **Response to General Comment 4:** The response does not address the comment. The new information is that the intent of the City and County of San Francisco is now to redevelop nearly all of Hunters Point for residential reuse. This information is not consistent with the previous reuse plan for Hunters Point which identified only limited areas for residential reuse. The Records of Decision (RODs) were based on the previous reuse plan. In addition, potential advancement in laboratory analytical capabilities and modification in ambient contamination levels since the last Five Year Review may also call into question the appropriateness of the Tier 1 or Tier 2 values. Therefore, it is appropriate to evaluate the Tier 1 or Tier 2 levels that were based on a practical quantitation limit (PQAL) or the Hunters Point ambient level (HPAL) to determine if there is risk that exceeds 10⁻⁴ at that Tier 1 or Tier 2 level. Please revise the FYR to include the assessment of the risk associated with the Tier 1 and Tier 2 levels that were based on PQALs or HPALs to ensure that the soil remedies remain protective.
2. **Response to General Comment 11 (a through d):** The responses partially address the comment. It is unclear if these observations are now included in the photograph logs and inspection checklists as they were not provided with this review. Also, the comments request figures depicting the locations of the observations; however, the responses do not indicate that any figures have been revised. Please clarify whether the observations are shown in the corresponding photograph logs and inspection checklists and update the figures as requested in the original comment.
3. **Response to General Comment 12:** The response does not address the comment. Maps depicting the changes in the plume extents were included in the 3rd FYR, so they should be updated to demonstrate the progress made since then. Please include updated maps depicting the changes in the plume extents since the 3rd FYR to demonstrate the progress in remediating the groundwater plumes.
4. **Response to General Comment 13a:** The response partially addresses the comment. The Figure 6 legend indicates that groundwater treatment was completed in Parcel C, but that is not the case. Additional groundwater treatment is required to address remaining contamination. Please revise the legend in Figures 6 to delete the word “COMPLETE” in reference to groundwater treatment areas in Parcel C.
5. **Response to Specific Comment 10:** The response partially addresses the comment. The response provides some explanation; however, the references to the revised sections are confusing. For example, the response indicates that Section 3.3.3.1 was revised to refer specifically to Section 3.3.2.2, but the reference is actually Section 3.3.3.2 (page 3-17). Also, the original comment requested an estimate for the time when sufficient data would be available to determine the outcome of the injections, but the response did not address this issue. Please resolve the discrepancy in Section 3.3.3.1 and provide an estimate for the time when sufficient data will be available to determine the outcome of the injections.

6. **Response to Specific Comment 20:** This response does not address the comment. The FYR should discuss the progress in implementing the in-situ groundwater remedies and MNA groundwater remedies in Sections 6.1.4 and 6.1.5, respectively, in order to analyze whether the remedies are performing as intended. For example, if a plume is migrating or expanding, then the remedy is not performing as intended. One way to demonstrate this is to provide figures depicting changes in the plume extents over time and to discuss plume stability in the text. Please revise Sections 6.1.4 and 6.1.5 to provide additional information regarding the performance of the groundwater remedies, including plume stability, and provide figures depicting changes in the plume extents over time.

7. **Response to Specific Comment 26:** This response partially addresses the comment. Currently, the revised FYR states “Site-specific Studies (e.g., remedy analyses) should be performed to estimate the magnitude and extend of source mass at each treatment area in Parcels B-1 and C to determine if other measures could be implemented to enhance SVE performance in the future.” In addition to the SVE remedy performance evaluations proposed, the Navy should also conduct remedy effectiveness evaluations at Parcels B-1 and C due to the ineffectiveness of the SVE component of the remedy. Please revise the FYR to include a commitment to conduct a remedy effectiveness evaluation and timeline for this evaluation.