

TABLE 1: RESPONSES TO COMMENTS FROM U.S. ENVIRONMENTAL PROTECTION AGENCY ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008

The table below contains the responses to comment received from the U.S. Environmental Protection Agency (EPA) on the “Draft Proposed Plan for Parcel B, Hunters Point Shipyard, San Francisco, California,” dated March 25, 2008. The comments addressed below were received from the EPA on April 21, 2008. Throughout this table, *italicized* text represents additions to the document and ~~strikeout~~ text indicates locations of deletions. Also throughout this table, references to page, section, table, and figure numbers pertain to the new document unless indicated otherwise.

No.	Page	Comment	Response
Responses to Comments from EPA			
GENERAL COMMENTS			
1.	---	The document doesn't make a clear distinction between the three TCRAs and the remedial actions. The document needs to be clear about what actions will be complete before the ROD Amendment is signed and not vaguely include soil excavations and rad screening of excavations associated with the TCRAs in the remedial action descriptions. Are the TCRAs going to be incomplete and then rolled into the ROD Amendment? If so, that should be clearly described. We've highlighted several problem areas in our specific comments.	The Navy intends that the time-critical removal actions (TCRA) will achieve final cleanup goals so that there will be no need for further remedial action. The three TCRAs will be in progress at the time the amended Record of Decision (ROD) is signed, but the TCRAs will not be completed. Consequently, components of the preferred alternatives that are addressed as TCRAs remain in the remedy description. The proposed plan was revised to more clearly describe the timing of the TCRAs relative to the proposed remedial actions. Also refer to the responses to specific comments below.
2.	---	The Proposed Plan needs to specify the proposed cleanup standards/goals. As noted below, there are no defined standards for VOCs or for rad.	Cleanup goals for radiological contaminants were added as a new table. Cleanup goals for volatile organic compounds (VOC) in soil and groundwater were included in the draft proposed plan; cleanup goals for VOCs in soil gas were clarified to indicate that the remediation goals for soil gas will correspond to a cancer risk of 10 ⁻⁶ . However, numeric goals for VOCs in soil gas will not be established in the proposed plan. A soil gas survey conducted following the remedial actions will provide data to establish numeric goals for VOCs in soil gas, which will then be used to evaluate the need for additional action or institutional controls (IC). Also refer to the responses to specific comments below.
3.	---	The confusion regarding the relationship between the removal actions and the proposed remedial action extend into the tables comparing alternatives. All references to removals need to be eliminated from the alternatives comparison unless the work is not expected to be complete and the activity is included within the proposed remedial action.	The Navy intends that the TCRAs will achieve final cleanup goals so that there will be no need for further remedial action. However, components of the preferred alternatives that are addressed as TCRAs remain in the remedy description because the TCRAs will not be complete by the time the amended ROD is signed. Changes were made to the text of the proposed plan to further clarify the relationship between the TCRAs and the amended ROD. However, since the tables listing the alternatives will be

TABLE 1: RESPONSES TO COMMENTS FROM U.S. ENVIRONMENTAL PROTECTION AGENCY ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
			closely located to the text describing them, no changes were made to the tables.
4.	---	The list of proposed ARARs contains a series of inconsistent elements. There are cover standards under UMTRCA, NRC, RCRA and Solid Waste regulations. Since there is very limited information in the PP regarding the regulatory status of the material to be capped, listing all of these authorities makes it difficult for the reader to understand what is being proposed. EPA proposes eliminating UMTRCA completely, identifying the elements of the NRC regs being cited and clarifying that the proposed cover will be based on solid waste standards.	Uranium Mill Tailings Radiation Control Act (UMTRCA) standards in Title 40 <i>Code of Federal Regulations</i> (CFR) Part 192 are identified as potential applicable or relevant and appropriate requirements (ARAR) in EPA guidance in Directive No. 9200.4-18 from the EPA Office of Solid Waste and Emergency Response (OSWER). The specific sections cited in the proposed plan are listed in the OSWER Directive as potential ARARs for radiologically impacted sites. The Navy will retain these requirements as per the OSWER Directive. The proposed plan was not changed as a result of this comment.
SPECIFIC COMMENTS			
1.	4	Page 4, Activities at Parcel B Since the 1997 ROD: The Rad, Methane and Mercury sources are listed in the section that ends with the statement that the new information supports the need to amend the ROD. However, this is immediately followed with a description of how these issues will be addressed with TCRA. Please move this discussion into the TCRA section and better explain how the remedial action will follow-up on the TCRA or else explain in some other way the interaction between the TCRA and actions taken pursuant to the proposed ROD Amendment. The current conclusion sentence is too vague about how the ROD amendment will address any remaining issues. What's the timing? Will the TCRA be complete or ongoing at the time of the ROD Amendment? How will the ROD Amendment address issues remaining from the TCRA? Perhaps the easiest way is to include monitoring of the methane source area after the TCRA completions and contingency remedies in the ROD Amendment.	<p>The presence of radiological, methane, and mercury sources of contamination supports the need for amending the ROD. However, the mention of the TCRA for radiological contamination may be confusing, so that sentence was deleted from the paragraph titled "Radiological Removal Actions."</p> <p>The following text was added to introduce the section on TCRA to more clearly explain the relationship between TCRA and the amended ROD. <i>"The Navy decided to address some of these sources of contamination using time-critical removal actions (TCRA). The following discussion describes the TCRA for methane, mercury, and radiological contaminants and the relationship of the TCRA to the remedial actions that the Navy anticipates will be selected in the amended ROD."</i></p> <p>The Navy intends that the TCRA will achieve final cleanup goals so that there will be no need for further remedial action. The three TCRA may be in progress at the time the amended ROD is signed, but the TCRA may not be completed. Consequently, components of the preferred alternatives that are addressed as TCRA remain in the remedy description. The description of the remedial alternatives was revised to more clearly address any issues remaining after actions are taken, whether from the TCRA or the remedial actions. For example, soil gas monitoring that is proposed post-remediation will identify any issues that may remain from the methane source removal, and groundwater monitoring will identify any remaining concerns related to mercury in groundwater in the mercury source removal area. Contingencies</p>

TABLE 1: RESPONSES TO COMMENTS FROM U.S. ENVIRONMENTAL PROTECTION AGENCY ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
			<p>were included in the remedial alternatives (such as methane venting) discussed later in the proposed plan to address any shortfalls from the TCRAs. The last paragraph of the TCRA section was replaced as follows: <i>“The use of TCRAs allows the Navy to get an early start on cleanup at these newly identified source areas. The TCRAs are consistent with the cleanup alternatives described later in this Proposed Plan; for example, several of the soil cleanup alternatives include excavation at areas that are also addressed in the TCRAs. Although the TCRAs may not be completed by the time the amended ROD is signed, the Navy anticipates that the TCRAs will meet the RAOs described in this Proposed Plan.”</i></p>
2.	5	<p>Pages 5, What are the Site Risks: This section should include a paragraph on radiological risks.</p>	<p>Based on verbal communications between the Navy and EPA on June 12, 2008, the proposed plan was not changed as a result of this comment.</p>
3.	6	<p>Page 6, Soil and Sediment: The third bullet should be similar to the other bullets. The cover will be two feet, but the RAOs limiting exposure should apply to all depths. In fact, all four bullets should be deleted because they all apply the same restrictions across the entire site. Rewrite the sentence in (a) as something like: “(a) Ingestion of, outdoor inhalation of, and dermal exposure to soil currently existing on site”.</p>	<p>Remediation goals are set based on 10^{-6} risk so they change by risk exposure scenario, and therefore change by location (redevelopment block) across the parcel. Consequently, the location on the parcel (by type of redevelopment block) is important to define the exposed individuals and the associated redevelopment blocks.</p> <p>The regulatory agencies and their risk assessors agreed to evaluate the recreational scenario using the soil data from 0 to 2 feet below ground surface (bgs) during the negotiations on the risk assessment methodology in 2003 and 2004. EPA guidance generally assumes minimal surface disturbance for the recreational scenario (related to, for example, walking on trails or planting flowers) versus more extensive disturbance for the residential scenario (such as excavation for building foundations or pools). However, the use of data from 0 to 2 feet bgs does not imply that there is no risk below 2 feet, only that exposure was not evaluated below 2 feet (that is, no data reviewed, no chemicals of concern selected, and no risks calculated). A similar example would be domestic use of the A-aquifer. This risk was not evaluated, but that does not imply that there is no risk from domestic use of groundwater in the A-aquifer.</p> <p>The proposed plan was not changed as a result of this comment.</p>
4.	6	<p>Page 6, Soil and Sediment: Please delete the second sentence from Paragraph 2. Remediation goals are always set in the ROD, not RD. The process for achieving the goals may be defined in the RD, but not the goal. I know that the Navy hasn’t performed the modeling or risk assessments that</p>	<p>The text was revised as follows: “2. Prevent exposure to VOCs in soil gas at concentrations that would pose unacceptable risk (<i>that is, risk greater than 10^{-6}</i>) via indoor inhalation of vapors. Remediation goals for soil gas will be established in the remedial</p>

TABLE 1: RESPONSES TO COMMENTS FROM U.S. ENVIRONMENTAL PROTECTION AGENCY ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
		would set a cleanup goal in the ground, but at least you can state that the indoor air pathway will be less than 10-6.	design (RD). ”
5.	6	Page 6, Soil and Sediment: This is a case of a TCRA being somewhat muddled with the remedial actions. The TCRA is simply removing organic material, but what exactly is the ROD Amendment proposing? The ROD will need to describe site conditions at the time it is signed which we expect will be post TCRA. Will there be a contingency in the ROD Amendment or simply monitoring. What standard will monitoring be compared against?	The remedial action objective (RAO) for methane is to prevent presence of methane in soil gas at concentrations that could accumulate and become explosive in structures. The lower explosive limit for methane is 5 percent by volume in air. However, a numerical criterion is not appropriate because the degree of accumulation is unknown. For example, concentrations less than 5 percent could accumulate over time to levels that could be explosive. Instead, the remedial alternative includes more detailed characterization of the methane source area using results of soil, soil gas, and groundwater samples, followed by excavation with real-time field monitoring—especially visual observation of waste materials. Soil gas samples will be collected from probes installed in the backfilled excavation; results from these probes will be used to evaluate whether the removal successfully eliminated the methane source or when additional controls (such as methane venting) may be needed. The discussion of the preferred remedial alternative for soil was expanded to include the post-remediation contingencies.
6.	8	Page 8, Radiologically Impacted Soil and Structures: What soils are impacted by radioactive materials? The TCRA's are addressing all soil concerns, except those areas under existing buildings. Also, are there any storm and sewer lines under non-impacted buildings, and if so, how will they be handled? Please separate the goals for soil from those for buildings. They can stay in the same section, but split the numbered lists.	Former building sites (that is, former Buildings 114 and 157) and the area of IR-07/18 are the only soil sites at Parcel B that are considered radiologically impacted. No storm drains or sanitary sewers are present beneath buildings that are not radiologically impacted. The RAOs apply to both soil and structures, so separation of the lists would only repeat the same RAOs. The proposed plan was not changed as a result of this comment.
7.	8	Page 8, Radiologically Impacted Soil and Structures: Please delete the word ‘significantly’ in Sentence 1.	The text was revised as suggested.
8.	8	Page 8, Radiologically Impacted Soil and Structures: Lines 2 and 3 are inconsistent given that 25 millirems per year presents a risk level much greater than 10-6. EPA requires risk based cleanup standards and does not accept 25 millirems/year as acceptable. What standard will be used to identify/address surface anomalies within 7/18?	The RAO discussing the 25 millirem per year (mrem/yr) cleanup standard was deleted. The standard for an anomaly at IR-07/18 will be established in planning documents for the action at that area (whether it is a portion of the TCRA or part of the remedial design [RD]).
9.	9	Page 9, Remedial Alternatives for Radiologically Impacted Soil and Structures: Similar to a previous comment, why are the storm drains and	The Navy intends that the TCRA will achieve final cleanup goals so that there will be no need for further remedial action. However, components of the preferred alternatives that are addressed as TCRA's remain in the

TABLE 1: RESPONSES TO COMMENTS FROM U.S. ENVIRONMENTAL PROTECTION AGENCY ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
		sanitary sewer lines included here?	remedy description because the TCRAs may not be complete by the time the amended ROD is signed. The proposed plan was not changed as a result of this comment.
10.	9	Page 9, Remedial Alternatives for Radiologically Impacted Soil and Structures: Please add ‘anomalies’ to the glossary or use language like: “...any radiologically impacted soil or objects above the cleanup goals...”.	The following definition was added to the glossary: “ <i>Anomaly: An irregularity, a misproportion, or something that is strange or unusual. Numerical criteria defining an anomaly specifically related to the surface scan for radioactive substances at IR Sites 7 and 18 will be established in planning documents for the action at that area (whether it is a portion of the TCRA or part of the remedial design).</i> ”
11.	9	Page 9, Preferred Alternatives: Please change the paragraph after the numbered list to say that DTSC, the Regional Board and EPA accept the preferred alternatives.	DTSC has indicated that acceptance of the preferred alternatives will not be granted until after the public comment period is completed (see DTSC comment 12). The text was revised as follows: “Based on the comparison of remedial alternatives, the Navy identified preferred alternatives for soil, groundwater, and radiologically impacted soil and structures. EPA/DTSC accepts the preferred alternatives. State and community acceptance will be evaluated after the public comment period for the Proposed Plan.”
12.	9	Page 9, Soil (Alternative S-5): Again, how are the TCRAs and ROD Amendment going to mesh?	The following text was added to the description of the preferred soil alternative: “ <i>Some components of this alternative are in progress as TCRAs (methane and mercury source removals). The use of TCRAs allows the Navy to get an early start on cleanup at these newly identified source areas. Although these TCRAs may not be completed before the amended ROD is signed, the Navy anticipates that the TCRAs will meet the RAOs described in this Proposed Plan. After the TCRAs are completed, the Navy will evaluate the need for additional response actions.</i> ”
13.	10	Page 10, Soil (Alternative S-5): There is a typo in the sentence “... disposed of at a off-site...”; ‘a’ should be ‘an’.	The text was revised as suggested.
14.	10	Page 10, Soil (Alternative S-5): I’m confused by the statement regarding the conduct of the soil gas survey during remedial design. In recent meetings, the Navy has insisted that the site-wide soil gas survey will only be conducted after active groundwater remediation. Is this a change in Navy policy? Also, the cleanup standards must be set in the ROD Amendment. The soil gas survey can be done to assess where and how large remediation should be and where LUCs are required, but not to determine remediation	As noted in the response to General Comment 2, cleanup goals for VOCs in soil gas were clarified to indicate that the remediation goals for soil gas will correspond to a cancer risk of 10 ⁻⁶ . A soil gas survey conducted following the remedial actions will provide data to establish numeric goals for VOCs in soil gas, which will then be used to evaluate the need for additional action or ICs. In some areas, site-specific pre-remediation soil gas surveys may be necessary to support the

TABLE 1: RESPONSES TO COMMENTS FROM U.S. ENVIRONMENTAL PROTECTION AGENCY ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
		goals.	RD. The text of the draft proposed plan that mentioned the survey during the RD was incorrect.
15.	10	Page 10, Soil (Alternative S-5): The last sentence states that future land owners need approval from the Navy before intrusive work. No where else does this document get into who will be held responsible for LUC implementation/enforcement. The document should describe the LUC/RMP approach. [Note the ROD Amendment will need to incorporate EPA’s IC Checklist requirements.]	The following text was added to the discussion of the preferred alternative for soil to describe ICs and the risk management plan (RMP): <i>“Following these activities, the Navy and regulatory agencies will implement ICs for the continued protection of public health and the environment and to ensure the integrity of the containment remedies (for example, soil covers and shoreline revetment). ICs are specified in legally binding Quitclaim Deeds and covenants to restrict use of property. The insert on pages 17 and 18 provides an overview of ICs.</i> <i>A risk management plan (RMP) will be prepared by the City and County of San Francisco and approved by the Navy and the federal facility agreement (FFA) signatories (EPA, DTSC, and the Water Board). The RMP will specify soil and groundwater management procedures for implementation of the ICs during redevelopment and future operation and maintenance of the soil and groundwater remedies. The RMP will identify the roles of local, state, and federal government in administering the RMP and will include, but not be limited to, procedures for any necessary sampling and analysis requirements, worker health and safety requirements, and any necessary site-specific construction or use approvals that may be required. The insert on pages 17 and 18 contains more details about ICs.”</i> The amended ROD will incorporate requirements in the EPA IC checklist.
16.	10 and 11	Page 10 and 11, Radiologically Impacted ...: Another case of TCRA/ROD Amendment confusion. It’s not enough to say that the storm/sewer line removal is already in progress. Will that action be complete, or is there a specific plan for the remedial action to complete the removal action?	The cited sentence was deleted, and the following text was added following the description of the alternative: <i>“Similar to the preferred alternative for soil, some components of this alternative are in progress as a TCRA (storm drain and sanitary sewer removals and building surveys). Although the TCRA may not be completed before the amended ROD is signed, the Navy anticipates that the TCRA will meet the RAOs described in this Proposed Plan.”</i>

TABLE 2: RESPONSES TO COMMENTS FROM THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008

The table below contains the responses to comment received from the Department of Toxic Substances Control (DTSC) on the “Draft Proposed Plan for Parcel B, Hunters Point Shipyard, San Francisco, California,” dated March 25, 2008. The comments addressed below were received from the DTSC on May 23, 2008. Throughout this table, *italicized* text represents additions to the document and ~~strikeout~~ text indicates locations of deletions. Also throughout this table, references to page, section, table, and figure numbers pertain to the new document unless indicated otherwise.

No.	Page	Comment	Response
Responses to Comments from DTSC (Daniel Murphy)			
GENERAL COMMENT			
1.	---	With the exception of the issue of maintenance of soil covers at the shoreline, DTSC finds that the soil and groundwater remedies presented in the draft Parcel B Proposed Plan are consistent with risk based remedies under CERCLA [Comprehensive Environmental Response, Compensation, and Liability Act], and are protective of public health and the environment.	Please refer to the response to DTSC specific comment 10 for details related to the maintenance of soil covers at the shoreline.
SPECIFIC COMMENTS			
1.	1	Page 1, Second Paragraph, last sentence Use of the word “clean up” may cause misunderstanding because some contamination will be left behind. DTSC suggest the sentence be rewritten as follows: The Navy proposes the following actions to address contamination in soil, groundwater, and structures at Parcel B:	The text was revised as suggested.
2.	1	Page 1, First Bullet This sentence may also cause misunderstanding and confusion in regards to other statements about installing soil covers. Clarifying language may reduce misunderstandings. For example, removing soil in areas with organic and metal contamination because of the potential for these contaminants to migrate through soil gas or groundwater and affect human health and the San Francisco Bay. Moving the fifth bullet (soil covers) so that it directly follows this soil excavation bullet will place these two related soil remedies together.	Details on potential contaminant migration and exposure pathways are not appropriate for this general introductory list. This information is presented later in the detailed description of the remedial alternatives. The bullet describing soil covers was moved from fifth to second to immediately follow the discussion of soil excavation.
3.	2	Page 2, last paragraph Please add the phrase, ‘to the TMSRA’ after Radiological Addendum.	The text was revised as suggested.
4.	3	Page 3, third paragraph	The text was revised as suggested.

TABLE 2: RESPONSES TO COMMENTS FROM THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
		Please change the first sentence to: With the concurrence of the regulatory agencies, the Navy may modify.....	
5.	3	<p>Page 3, Parcel B History</p> <p>In order to clarify that atomic weapons testing was not conducted at Hunters Point, please change sentence to read: "...atomic weapons testing conducted in the South Pacific during the 1950s..." Also, the 'radiological decontamination center for personnel' is not an activity. Please edit this sentence for clarity. Using bullets can help clarify the activities, for example the sentence could be rewritten as follows:</p> <p>Other significant activities at Parcel B include:</p> <ul style="list-style-type: none"> • Potential disposal of materials generated from the decontamination of ships used in atomic weapons testing conducted in the south pacific during the 1950s; • Radiological decontamination of personnel; • Storage of samples from atomic weapons testing; and • Storage of low-level radioactive waste. 	The text was revised as follows. <i>"Other significant activities at Parcel B included radiological operations including radiological decontamination of ships and personnel and storage of radioactive material."</i>
6.	4	<p>Page 4, Methane</p> <p>Please clarify that although the methane poses no current risk to the public, future users could be at risk.</p>	The discussion of potential risk is more appropriate later in the proposed plan. The cited sentence was deleted to avoid potential confusion.
7.	4	<p>Page 4, Radiological Removal Action</p> <p>Please change sentence to read: ... use of general radioactive materials and decontamination of ships used in atomic weapons testing in the south pacific.</p>	The text was revised as suggested.
8.	5	<p>Page 5, Human Health Risk Assessment (HHRA)</p> <p>In order to clarify that mixed use includes residential, please add 'including residential' after 'mixed use'.</p>	The text was revised as suggested.
9.	7	<p>Page 7, Groundwater RAOs #2</p> <p>Please clarify what water uses are within the domestic use pathway. This could be accomplished through a parenthetical (i.e. drinking water, shower).</p>	The text was revised as suggested.
10.	9	<p>Page 9 first paragraph, Remedial Alternatives for Radiologically Impacted Soil and Structures</p> <p>Please add a description, in the remedial activities section, of how</p>	<p>The following text was added to the discussion of the preferred alternative for soil to describe ICs and the RMP:</p> <p><i>"Following these activities, the Navy and regulatory agencies will</i></p>

TABLE 2: RESPONSES TO COMMENTS FROM THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
		<p>Institutional Controls will be used as part of the remedial alternatives, including purpose and implementation. Include unique aspects of Institutional Controls for radiologically impacted sites. Placing this information elsewhere in the document may cause confusion as to the role of Institutional Controls as a remedial action, especially for radiologically impacted sites.</p>	<p><i>implement ICs for the continued protection of public health and the environment and to ensure the integrity of the containment remedies (for example, soil covers and shoreline revetment). ICs are specified in legally binding Quitclaim Deeds and covenants to restrict use of property. The insert on pages 17 and 18 provides an overview of ICs.</i></p> <p><i>A risk management plan (RMP) will be prepared by the City and County of San Francisco and approved by the Navy and the federal facility agreement (FFA) signatories (EPA, DTSC, and the Water Board). The RMP will specify soil and groundwater management procedures for implementation of the ICs during redevelopment and future operation and maintenance of the soil and groundwater remedies. The RMP will identify the roles of local, state, and federal government in administering the RMP and will include, but not be limited to, procedures for any necessary sampling and analysis requirements, worker health and safety requirements, and any necessary site-specific construction or use approvals that may be required. The insert on pages 17 and 18 contains more details about ICs.”</i></p> <p>Details concerning any unique aspects related to radiological contaminants are included on the insert.</p>
11.	9	<p>Page 9, Section: How Do The Remedial Alternatives Compare? Please list the other two alternatives, State Acceptance and Community Acceptance, and describe how these criteria are applied in making the final remedial decision.</p>	<p>The text was revised as follows: “Selection of the preferred alternatives was based on an evaluation of the remedial alternatives using seven of the nine criteria specified in the NCP. <i>The other two criteria, state acceptance and community acceptance, will be evaluated after the public comment period.</i> General descriptions of the nine criteria are presented...”</p>
12.	9	<p>Page 9, Preferred Alternatives Please delete ‘DTSC accepts the preferred alternatives’. DTSC will officially accept the preferred alternatives after the public comment period is completed. Please add ‘Regulatory and’ in front of the sentence beginning with ‘Community acceptance’.</p>	<p>The text was revised as follows: “Based on the comparison of remedial alternatives, the Navy identified preferred alternatives for soil, groundwater, and radiologically impacted soil and structures. EPADTSC accepts the preferred alternatives. <i>State and community acceptance will be evaluated after the public comment period for the Proposed Plan.</i>”</p> <p>Please also refer to the response to EPA specific comment 11.</p>
13.	10	<p>Page 10. Soil (Alternative S-5). The language discussing the soil covers at the shoreline nearly meets DTSC’s</p>	<p>The text was revised as suggested: “Covers would be maintained to contain the soil <i>at the shoreline laterally up to the seawalls</i>. The RD will include</p>

TABLE 2: RESPONSES TO COMMENTS FROM THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
		<p>needs for ensuring that lateral containment of the soil cover at the shoreline is ensured; however, the language falls short of ensuring that a cover, threatened with erosion at the shoreline because of a damaged sea wall, is maintained and repaired. DTSC continues to ask the questions:</p> <ul style="list-style-type: none"> • What will happen if the sea wall is no longer present or effective? • If at present no sea wall existed, how would a cover be engineered and designed to ensure protection at the shoreline? • What are the Operational and Maintenance and Institutional Controls that will ensure protection of the cover at the shoreline? <p>Please change the sentence, “Covers would be maintained to contain the soil laterally up to the seawalls” to “Covers would be maintained to contain the soil at the shoreline.” Also, please describe how Institutional Controls shall be used to ensure the maintenance of the soil cover at the shoreline.</p>	<p>plans for inspection and maintenance <i>to ensure covers remain intact. ICs will be implemented to maintain the integrity of the covers, including where the covers meet the shoreline.”</i></p> <p>Any deficiencies in the seawall that might affect the integrity of the soil cover would be identified during regular inspections and appropriate repairs implemented to protect the cover.</p> <p>All areas along the shoreline between the soil and the bay already have a seawall or are planned to have a revetment.</p> <p>Details of the operation and maintenance requirements will be identified in the RD. Specific requirements for ICs will be contained in the Quitclaim Deeds and restrictive covenants and in the RMP.</p>
<p>Responses to Comments from DTSC (Robin Hook, California Department of Public Health [CDPH])</p>			
<p>SPECIFIC COMMENTS</p>			
1.	9	<p>Page 9, first paragraph: Add the following statement after the parenthetical statement “the maximum effective depth of the surface scan”: There is the potential for radiological contamination to exist beyond the depth of 1 foot, however, no further investigations or removals will be performed at deeper depths at Sites IR 7 and 18.</p>	<p>The text was revised as follows. “Both alternatives also include a surface scan at IR Sites 7 and 18, and removal of any radiological anomalies to a depth of 1 foot (the maximum effective depth of the surface scan). <i>Although there is potential, however unlikely, for radiological contamination to exist beyond the depth of 1 foot, the soil cover would be effective in preventing any unacceptable exposure, and additional investigation beyond 1 foot is not proposed. A demarcation layer would be installed...</i>”</p>
2.	28	<p>Page 28, Attachment1: The Proposed Plan does not include any state laws or regulations relating to radiological contamination as potential state chemical-specific ARARs. The following California regulation should be included as a potential state chemical-specific ARAR: Title 17, California Code of Regulations, section 30256.</p>	<p>The state requirements at Cal. Code Regs. tit. 17, § 30256 are not more stringent than federal ARARs at 10 CFR Part 20. Therefore, the state requirements are not potential ARARs. All of the requirements of Cal. Code Regs. tit. 17, § 30256 are administrative and procedural requirements relating to the decommissioning process with the exception of the substantive provisions of § 30256(k). The administrative and procedural requirements are not considered ARARs (see definitions of “applicable” and “relevant and appropriate” at 40 CFR Section 300.5). The substantive provisions of § 30256(k) are state requirements and are not more stringent than CERCLA risk-based cleanup levels for IR Sites 7 and 18 and Building</p>

TABLE 2: RESPONSES TO COMMENTS FROM THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
			140 and potential federal ARARs at 10 CFR Section 20.1402 for other radiologically impacted areas within Parcel B. Therefore, they do not qualify as CERCLA ARARs. See 40 CFR Section 300.400(g)(4). The proposed plan was not changed as a result of this comment.
3.	9	Page 9, last paragraph: The preferred alternative for radiologically impacted soil and structures, Alternative R-3, does not clearly state that the cover will be an engineered cap. Please include a statement in the Proposed Plan that the cover will be an engineered cap.	An “engineered cap” is not a legally defined term under CERCLA. Covers will be engineered to be protective of human health; however, soil covers will be engineered alternatives to the prescriptive final cover standards under Cal. Code Regs. tit. 27, § 20080(b) and their basic design features are set forth in the proposed plan (surface scan with anomaly removal, demarcation layer and two foot clean soil cover). Federal and state ARARs for the cover include RCRA cover requirements at Cal. Code Regs. tit. 22 § 66264.310(a)(5), (b)(1), (b)(4), and (b)(5) and cover requirements at Cal. Code Regs. tit. 27 § 20080(b), 20090(d), 20950(d), 21090(b)(1), (c)(4), (e)(1) and (e)(3), 21140, 21145(a), and 21150. Designs for soil covers prepared by the Navy will be approved by a registered professional engineer. The proposed plan was not changed as a result of this comment.
4.	---	DEED RESTRICTIONS	The Navy believes that a meeting with CDPH and the other regulatory agencies is necessary to clarify the restrictions proposed in these comments in terms of CERCLA requirements. The Navy believes that the existing requirements under the CERCLA program will address the concerns listed below. The requirements listed below as deed restrictions will not be included in the proposed plan.
4. (con't)	---	1. The sites may not be transferred without the express finding by CDPH that the site qualifies for exemption from licensing pursuant to Health and Safety Code section 115060(c) and Title 17, California Code of Regulations, section 30104. CDPH may conduct a review at any time to determine whether the site continues to qualify for exemption from licensing pursuant to Health and Safety Code section 115060(c) and Title 17, California Code of Regulations, section 30104. CDPH shall be given access to all information that it requests in order to determine whether the site complies with exemption from licensing pursuant to Health and Safety Code section 115060(c) and Title 17, California Code of Regulations, section 30104.	The comment does not indicate whether CDPH intends for these provisions to apply to Navy transfers of federal property to non-federal entities or only to subsequent transfers. The Navy questions whether CDPH has the authority to prohibit the transfer of federally owned property without CDPH approval. The cited authorities do not address this issue and no applicable authority has been cited. The state requirements at California Health and Safety Code § 115060(c) and Cal. Code Regs. tit. 17 § 30104 are procedural requirements relating to a state licensing procedure. CERCLA remedies are exempt from federal and state permit and licensing requirements pursuant to Section 121(e) of CERCLA and are not required to comply with procedural requirements that do not qualify as ARARs. The Navy will work with DTSC and CDPH to

TABLE 2: RESPONSES TO COMMENTS FROM THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
			provide information requested by CDPH. The Navy expects DTSC and CDPH to work within the existing FFA schedule and schedule for transfer. The proposed plan was not changed as a result of this comment.
4. (con't)	---	2. At least 180 days prior to any transfer of any of the sites, the prospective landowner shall provide CDPH with a proposed monitoring plan for CDPH's approval, and no transfer may occur without CDPH's approval. The monitoring plan shall include, but not be limited to:	<p>The Navy's remedial design and remedial action (RD/RA) work plan will address any necessary long-term monitoring required to address the overall performance of the engineering component of the initial remedy. The Navy will solicit comments from DTSC and CDPH when the document is drafted and submitted to the federal facility agreement (FFA) signatories for review and approval.</p> <p>The City and County of San Francisco will prepare an RMP that will specify soil and groundwater management procedures for compliance with the institutional control provisions of the remedy selected in the Parcel B amended ROD. The RMP will identify the roles of local, state, and federal government in administering the RMP and will include, but not be limited to, procedures for any necessary sampling and analysis requirements, worker health and safety requirements, and any necessary site-specific construction or use approvals that may be required. The RMP will be reviewed and approved by the signatories to the HPS FFA including the Navy, EPA, DTSC, and the Water Board.</p> <p>The RMP will address any specific monitoring required in conjunction with future development and the implementation of institutional controls following conveyance. The proposed plan was not changed as a result of this comment (including all the subparts below).</p>
4. (con't)	---	(1) Certification that the engineered barrier is installed as specified by the Record of Decision;	The "engineered barrier" will include the soil cover at IR-07 and IR-18 and the concrete cap over the pump shaft at Building 140 as part of Alternative R-3 which is the preferred remedy for radiologically impacted soil and structures. The Navy will install the engineered barrier itself and document that the barrier is installed as specified in FFA deliverables and the conveyance documents for the property.
4. (con't)	---	(2) Identity of, experience and education of, and duties of proposed Radiation Safety Officer, whose appointment must be approved by CDPH; and procedures for obtaining advance written approval of CDPH prior to any change to the Radiation Safety Officer;	Requirements for a responsible individual to implement the radiological provisions of the RMP will be included as part of the RMP. The RMP and any changes to it will be reviewed and approved by the signatories to the HPS FFA including the Navy, EPA, DTSC, and the Water Board.

TABLE 2: RESPONSES TO COMMENTS FROM THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
4. (con't)	---	(3) Provisions for continual air monitoring, with results to be provided to CDPH at least weekly;	See response to Comment 4.2. Provisions for air monitoring will be included in the RD/RA work plan and RMP.
4. (con't)	---	(4) Provisions for area dosimeters for measuring ambient direct exposure levels with results to be provided to CDPH on at least a quarterly basis;	See response to Comment 4.2. Provisions for ambient radiation monitoring will be included in the RD/RA work plan and RMP.
4. (con't)	---	(5) Provisions for monitoring of groundwater, bay sediments and seawater with results to be provided to CDPH at least yearly;	Provisions for groundwater monitoring will be included in the amended ROD and details of that monitoring will be provided in the RD/RA work plan. Bay water and sediment will not be addressed through the amended ROD or RD/RA for Parcel B but will be addressed in documents for Parcel F.
4. (con't)	---	(6) Plans and procedures that will be followed to ensure that the engineered barrier will not be compromised unless the Radiation Safety Officer is present;	<p>The Parcel B RMP shall address any necessary additional soil and radiological management issues within the area requiring institutional controls (ARIC) for potential radionuclides defined in the amended ROD and property transfer documents.</p> <p>For any excavation into IR Sites 7 and 18 soils beneath the barrier or the deep pump shaft under Building 140, the proposed excavation will be required to be described in a work plan that will include, but not be limited to, a radiological work plan, soil sampling and analysis requirements, and a plan for off-site disposal of any excavated radionuclides in accordance with federal and state law. This work plan must be submitted to the Navy and the regulatory agencies in accordance with procedures (including dispute resolution procedures) and timeframes that will be set forth in the RMP. Details of work plan implementation will be set forth in the RMP. The integrity of the cover must be restored when excavation is complete, as provided in the RMP. A completion report describing the details of the implementation of the work plan, the sampling and analysis, the off-site disposal, and the restoration of the integrity of the cover must be submitted to and approved in writing by the Navy and the regulatory agencies in accordance with procedures (including dispute resolution procedures) and timeframes that will be set forth in the RMP.</p>
4. (con't)	---	(7) Plans and procedures that will be followed in the event of an earthquake or other disturbance of the site;	Soil covers will meet the final cover requirement to accommodate lateral and vertical shear forces generated by the maximum credible earthquake at Cal. Code Regs. tit. 22, § 66264.310(a)(5). This issue will be addressed in

TABLE 2: RESPONSES TO COMMENTS FROM THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
			the RD/RA work plan and operations and maintenance (O&M) plan.
4. (con't)	---	(8) Plans and procedures that will be followed when the engineered barrier is compromised for utility and other construction work; and	See response to Comment 4.2(6).
4. (con't)	---	(9) Provisions that no change may be made to the monitoring plan without the prior, written approval of CDPH, and CDPH may request a change to the monitoring plan whenever it deems it necessary.	The RD/RA work plan, O&M plan, and associated monitoring plan(s) will be subject to the HPS FFA and, therefore, governed by the requirements in the FFA related to revisions to documents. DTSC may initiate changes to these documents as provided in the terms of Section 7.10 of the FFA.
4. (con't)	---	3. The CDPH shall have discretion to require additional monitoring or conduct its own monitoring at any time.	See response to Comment 4.2.
4. (con't)	---	4. Prior to any transfer of the site, CDPH may conduct a baseline survey of the site.	Comment noted.
4. (con't)	---	5. Prior to transfer of the site, the site shall be equipped with a permanent monitoring system and wells, to be available to CDPH at any time. The wells shall be constructed at a location to be determined and after consultation with appropriate experts, such as hydrogeologists.	Several groundwater monitoring wells have already been installed in Parcel B. The amended ROD will contain requirements and objectives for future groundwater monitoring. The RD will specify the actual monitoring well system. DTSC will have the opportunity to comment on the monitoring well system through its comments on the amended ROD and RD. Institutional controls planned for Parcel B include provisions for site access by the regulatory agencies.
4. (con't)	---	6. CDPH shall have the authority to enter at any time without permission of landowner to perform necessary activities to protect public health, including, but not limited to, inspect the property, conduct or oversee monitoring, make modifications to the cap, or install additional protections at the site.	Access provisions will be required as part of the institutional controls to ensure that the Navy and the FFA signatories have access to remediation equipment and other remedy components for implementing the remedial action, performing maintenance, and conducting monitoring and inspections. Modifications to the remedy, such as changes to the cap or installation of additional protections, will be subject to the requirements of CERCLA related to post-ROD changes to a remedy.
4. (con't)	---	7. No new or amended use may be made of the site without the prior, written approval of CDPH.	Provisions for changes in land use will be included in the institutional controls that will be described in the amended ROD and in detail in the RMP.
4. (con't)	---	8. CDPH shall have the authority to restrict access to the site, without permission of landowner.	Following transfer of the property by the Navy to a non-federal entity, access and post-remedy inspection details will be included in the O&M Plan, which is a component of the RD/LUC milestone in CERCLA.

TABLE 2: RESPONSES TO COMMENTS FROM THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
4. (con't)	---	9. CDPH retains its ability to enforce all applicable laws and regulations including, but not limited to an order to cease use of the site, pursuant to Health and Safety Code section 115185.	This section is an enforcement provision which does not impose any substantive obligations and is not an ARAR for the Navy.
4. (con't)	---	10. On an annual basis, the landowner must submit a report that the engineered barrier is still intact and verified by inspection.	The Navy will provide reports on the continued effectiveness of the remedy at least every 5 years as required by CERCLA. The RD and the RMP will provide for additional reporting requirements and these documents will be subject to review and approval by DTSC.
4. (con't)	---	11. The landowner shall ensure that the site is continually posted with signs identifying the "Restricted Activities" as defined in the Proposed Plan, or as they may be amended from time to time.	Requirements for posting signs will be established in the amended ROD and in detail in the RD and RMP.
4. (con't)	---	12. No "restricted activity" as defined in the Proposed Plan may be conducted without the prior approval of CDPH, and CDPH may require that the activities be conducted in accordance with a soil management plan and radiation safety plan to be developed by the landowner and approved by CDPH.	Soil and groundwater management and radiation safety will be addressed in the RMP. Provisions for changes in allowable site activities will be included in the institutional controls that will be described in the amended ROD and in detail in the RMP.
4. (con't)	---	13. The landowner shall reimburse CDPH's Radiological Control Fund for the actual cost of all activities conducted by CDPH or its contractors at the site, regardless of whether they may have been conducted at the sole discretion of CDPH or may duplicate activities of the landowner or any other regulatory agency.	The Navy does not intend to include this language in the proposed plan.
5.	---	DEED RESTRICTIONS	Heading, no response necessary.
5. (con't)	---	Please add the following to the Deed Restrictions portion of the Proposed Plan for Building 140: 1. The site may not be transferred without the express finding by CDPH that the site qualifies for exemption from licensing pursuant to Health and Safety Code section 115060(c) and Title 17, California Code of Regulations, section 30104. CDPH may conduct a review at any time to determine whether the site continues to qualify for exemption from licensing pursuant to Health and Safety Code section 115060(c) and Title 17, California Code of Regulations, section 30104. CDPH shall be given access to all information that it requests in order to determine whether the site complies with exemption from licensing pursuant to Health and Safety Code section 115060(c) and Title 17,	See the response to Comment 4.1. The proposed plan was not changed as a result of this comment.

TABLE 2: RESPONSES TO COMMENTS FROM THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
		California Code of Regulations, section 30104.	

TABLE 3: RESPONSES TO COMMENTS FROM THE SAN FRANCISCO BAY REGIONAL WATER QUALITY CONTROL BOARD ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008

The table below contains the responses to comment received from the San Francisco Bay Regional Water Quality Control Board (Water Board) on the “Draft Proposed Plan for Parcel B, Hunters Point Shipyard, San Francisco, California,” dated March 25, 2008. The comments addressed below were received from the Water Board on April 10, 2008. Throughout this table, *italicized* text represents additions to the document and ~~strikeout~~ text indicates locations of deletions. Also throughout this table, references to page, section, table, and figure numbers pertain to the new document unless indicated otherwise.

No.	Page	Comment	Response
Responses to Comments from Water Board			
GENERAL COMMENT			
1.	---	Redevelopment Blocks – This proposed plan indicates that the remedial action objectives are based on redevelopment blocks presented in the San Francisco Redevelopment Agency’s reuse plan. Please include discussion on how these reuse plans may be subject to change, based on the potential for a future stadium reuse, and indicate how remedial action objectives and remedial goals would change as necessary.	The following text was added to the section titled “The CERCLA Process” to address the potential for future changes in land use. <i>“The remedial alternatives presented in this Proposed Plan are based on the currently anticipated future land uses outlined in the redevelopment plan from the San Francisco Redevelopment Agency. However, reuse plans are subject to change. Changes in the planned reuse may lead to reconsideration of the remedial action objectives (RAO) and remediation goals and could cause further modifications to the ROD for Parcel B. CERCLA requires public involvement in changes to the remedy that are significant or fundamental.”</i>
SPECIFIC COMMENTS			
1.	8	Groundwater Remedial Action Objectives – Page 8 of 16, top paragraph – The last sentence of this paragraph is vague and confusing. Please revise.	The text was revised as follows: <i>“The same comparison was made for groundwater, with one additional constraint. If a legal requirement (see the discussion of applicable or relevant and appropriate requirements [ARAR] later) applied to the chemical, the value <i>specified in the legal requirement</i> was selected; otherwise the same comparison was made.</i>
2.	10	Soil (Alternative S-5) – Page 10 of 16, top paragraph – Please spell out the acronym LLRW.	The text was revised to spell out low-level radioactive waste, but the acronym is unnecessary and was deleted.
3.	11	Radiologically Impacted Soil and Structures (Alternative R-3) – Page 11 of 16, top paragraph – This section describes how any radiological anomalies detected during the surface scan at IR Sites 7 and 18 would be	The details of the identification of radiological anomalies and their removal will be contained in the planning documents for the action at IR-07 and IR-18. The following definition was added to the glossary: <i>“Anomaly: An</i>

TABLE 3: RESPONSES TO COMMENTS FROM THE SAN FRANCISCO BAY REGIONAL WATER QUALITY CONTROL BOARD ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008 (CONTINUED)

No.	Page	Comment	Response
		<p>removed to a depth of 1 foot. Does this mean that radiological anomalies detected at the one foot depth would be left in place? Please indicate how radiological anomalies detected at the one foot depth will be addressed, and how future users and construction workers will be protected from potential radiological anomalies left in place at depth. Please include a definition of radiological anomaly or provide a suitable reference.</p>	<p><i>irregularity, a misproportion, or something that is strange or unusual. Numerical criteria defining an anomaly specifically related to the surface scan for radioactive substances at IR Sites 7 and 18 will be established in planning documents for the action at that area (whether it is a portion of the TCRA or part of the remedial design)."</i></p> <p>As noted in the text of the proposed plan, 1 foot is the maximum effective depth of the surface scan. Anomalies detected at 1 foot will be removed.</p>

TABLE 4: RESPONSES TO COMMENTS FROM CITY AND COUNTY OF SAN FRANCISCO ON THE DRAFT PROPOSED PLAN FOR PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, MARCH 25, 2008

The table below contains the responses to comment received from the City and County of San Francisco Health Department on the “Draft Proposed Plan for Parcel B, Hunters Point Shipyard, San Francisco, California,” dated March 25, 2008. The comments addressed below were received from the San Francisco Health Department on May 5, 2008. Throughout this table, *italicized* text represents additions to the document and ~~strikeout~~ text indicates locations of deletions. Also throughout this table, references to page, section, table, and figure numbers pertain to the new document unless indicated otherwise.

No.	Page	Comment	Response
Responses to Comments from City and County of San Francisco			
GENERAL COMMENTS			
1.	---	The discussions about the proposed radiological restrictions for IR7/18, and the figures that show the boundaries of IR7/18, imply that the entire area of IR7/18 will need the proposed radiological restrictions. We think this is a false assumption. The boundaries of IR7/18 were originally drawn because of historical uses (including a paint shop) unrelated to suspected radiological contamination. The suspicions about radiological contamination in the area were not identified until the publication of the HRA – long after the IR7/18 boundary had been drawn. It was convenient to refer to the whole area when discussing the radiological concerns because detailed research had not been performed to identify the area within IR7/18 that actually contained possible radiological contamination – which may or may not exist. The Navy has since performed research into the extent of the debris fill in the IR7/18 area, which is suspected to be related to the possible radiological contamination that indicates that the fill does not extend all the way to the boundaries of the IR7/18 area. We request that the Navy propose boundaries for the extent of the radiological restricted area that are supported by the historical information and not overly restrict land where it is not warranted. We request that it be made clear in the Proposed Plan that the radiological restriction does not extend all the way to the outer boundaries of IR7/18.	The HRA is the source document for the definition of areas that are radiologically impacted. The HRA considered all of IR-07 and IR-18 to be radiologically impacted, and the Navy will maintain that definition in the proposed plan. The ARIC for radionuclides will include all of IR-07 and IR-18 and the pump shaft beneath Building 140. The proposed plan was revised to include a map showing the location of this ARIC (Figure 5).
2.	---	The proposed plan discusses information based on redevelopment blocks. As the City has repeatedly noted to the Navy, the Navy’s use of the redevelopment block concept has become problematic in the decision documents. The redevelopment block concept was originally adopted by the Navy to address issues related to the ubiquitous metals.	The proposed plan was revised to reduce the use and emphasis on redevelopment blocks to the extent possible. However, a means to clearly and unambiguously identify areas within Parcel B is still needed to explain the proposed remedial actions, and redevelopment blocks still serve that purpose. The Navy would appreciate communications from the

No.	Page	Comment	Response
		<p>Now, however, we are faced with the reality that, like other attempts to discuss and divide up contamination areas (the Operable Units concept was changed into Parcels and the description of contamination by Installation Restoration sites was changed to description by redevelopment block) – the redevelopment block concept is not working for remedy implementation. We are also quite certain that the redevelopment block configuration is going to change.</p> <p>The Navy has already stopped using the redevelopment block concept for the proposed restrictions for the IR7/18 area, because it recognized the inappropriateness of applying radiation-related restrictions for this area to the whole redevelopment block.</p> <p>Just as the Navy is required to clean-up contamination, they are also required to not arbitrarily over-restrict property when it is not warranted. We request that the Navy drop the use of the redevelopment block concept for any area where the use of the concept is artificially restricting more property than is necessary. The most glaring example is the Building 123 area where VOC contamination (in soil or groundwater) is suspected to generate an indoor air inhalation risk. Buildings that are not wholly or partially on top of VOC inhalation risk areas should not have vapor control system requirements because they are not needed when there is no indoor air inhalation risk.</p> <p>The redevelopment block concept should be dropped in relation to remedy implementation. We strongly recommend that any future documents discussing remedy implementation drop the discussion of redevelopment blocks.</p>	<p>city when changes to redevelopment blocks, and especially those changes that affect the reuse exposure, are determined.</p> <p>As discussed in the insert on ICs, the ARIC for vapor intrusion may be modified as remediation is completed or in response to further sampling and analysis that establishes that areas now in the ARIC do not pose unacceptable potential exposure risk to VOC vapors. The initial ARIC is proposed to include the entire parcel (except Redevelopment Block 4) because existing data for soil gas are insufficient to further reduce the size of the ARIC.</p> <p>The Navy will work closely with the city to use the most current plans for land reuses at Parcel B, but the Navy does not propose to abandon the concept of redevelopment blocks.</p>
3.	---	<p>Based on the current design of the proposed remedies, we would like to point out that from a human health risk perspective, the requirement for</p> <ul style="list-style-type: none"> • covers to cut off the pathway for the direct exposure risk from soil contaminants (all areas) • installation of vapor mitigation systems to cut off the pathway for VOC inhalation risk in areas that have a VOC inhalation risk means that the entire property will be health protective for residential uses, because the pathways for exposure from the primary risk drivers will have been cut off. We recognize that all allowable land uses will include some restrictions on activities, such as prohibitions against: <ul style="list-style-type: none"> • extraction or use of groundwater • removing covers unless Risk Management Plan procedures are followed • altering, disturbing or removing any part of a physical remediation system • growing vegetables or fruits in native soil 	<p>The proposed remedial alternatives are specific to the reuse identified for each area. Future residents would be protected in areas currently identified for industrial or recreational reuse only by the consistent enforcement of the activity restrictions described in the insert on ICs. For example, the ARIC for vapor intrusion would need to be maintained in areas currently identified as open space (unless the ARIC could be modified by new data for soil gas, as discussed above in the response to general comment 2). The Navy believes stating the proposed remedy would result in an environment that would not pose health risks for future residents implies that future reuse would be unrestricted, and this will not be the case. The following text was added at the bottom of page 1 to note the general protectiveness of the planned revised remedy: <i>“After all the proposed actions are conducted and operation and maintenance and ICs are implemented, the actions proposed will be protective of human health and the environment and meet all cleanup objectives.”</i></p>

No.	Page	Comment	Response
		<p>We understand that this Proposed Plan and the documents that support it were written with reuse areas, as designated in the Redevelopment Plan, that specify non-residential areas (recreational and industrial). However, we believe that the Navy should point out that while the reuse plan itself does not allow for residential use, the remedies now proposed, when in place, would result in an environment that would not pose health risks, even for residential uses.</p>	
4.	---	<p>The Risk Management Plan (RMP) to be developed by the City has been agreed by all parties to be considered as part of the remedy; therefore it should be described in the Proposed Plan.</p>	<p>The following text was added to the discussion of the preferred alternative for soil to describe ICs and the RMP:</p> <p><i>“Following these activities, the Navy and regulatory agencies will implement ICs for the continued protection of public health and the environment and to ensure the integrity of the containment remedies (for example, soil covers and shoreline revetment). ICs are specified in legally binding Quitclaim Deeds and covenants to restrict use of property. The insert on pages 17 and 18 provides an overview of ICs</i></p> <p><i>A risk management plan (RMP) will be prepared by the City and County of San Francisco and approved by the federal facility agreement (FFA) signatories (EPA, DTSC, and the Water Board). The RMP will specify soil and groundwater management procedures for implementation of the ICs during redevelopment and future operation and maintenance of the soil and groundwater remedies. The RMP will identify the roles of local, state, and federal government in administering the RMP and will include, but not be limited to, procedures for any necessary sampling and analysis requirements, worker health and safety requirements, and any necessary site-specific construction or use approvals that may be required. The insert on pages 17 and 18 contains more details about ICs.”</i></p>
5.	---	<p>The Navy should differentiate between engineering controls (ECs) and institutional controls (ICs) throughout the Proposed Plan.</p>	<p>Additional discussion of engineering controls (EC) was added to appropriate locations throughout the proposed plan. Changes include the overview list of activities on page 1 and the descriptions of alternatives for soil later in the proposed plan.</p>
6.	---	<p>The Navy should describe the remedy selected in the previous ROD – removal of contaminants to 10 feet – and why that plan is no longer viable. It seems that this should be the basis for the revised plan, yet it is not clearly stated.</p>	<p>The text of “The CERCLA Process” section was revised as follows:</p> <p><i>“The original ROD for Parcel B was completed in 1997. The remedy for soil focused on removal of soil to 10 feet below ground surface (bgs) and off-site disposal of contaminated soil.”</i></p> <p><i>“Per the terms of the ROD, the Navy conducted cleanup actions in 1998 through 2001 to remove soil and monitor groundwater. Soil removals proved to be much larger and more costly than expected. Although the</i></p>

No.	Page	Comment	Response
			<i>Navy successfully met the cleanup goals at 93 of 106 excavations, the strategy of removal and off-site disposal did not achieve the cleanup goals everywhere across Parcel B. However, The 5-year review in 2003 concluded that...</i>
7.	---	Please clarify what actions will be completed prior to and after the ROD Amendment.	The Navy intends that the TCRAs will achieve final cleanup goals so that there will be no need for further remedial action. The three TCRAs may be in progress at the time the amended ROD is signed, but the TCRAs may not be completed. Consequently, components of the preferred alternatives that are addressed as TCRAs remain in the remedy description. The proposed plan was revised to more clearly describe the timing of the TCRAs relative to the proposed remedial actions.
8.	---	Please include a figure showing the IR site locations.	A figure illustrating the IR sites at Parcel B was added to the proposed plan (see Figure 4).
9.	---	Please change the headings on the tables to read "...Risks... prior to implementation of remedies"	The footnotes of Tables 1 and 2 were revised to indicate that risks relate to conditions before remediation. Changes to the table titles would make the titles too long for the compressed format of the proposed plan.
10.	---	Please clearly state that the total risk, after implementation of remedies, will be below 10-6.	Please refer to the response to General Comment 3. The proposed plan was not changed as a result of this comment.
11.	---	To simplify public review and understanding of this document, the Navy should list the most applicable documents. This will assist the public if they are not familiar or comfortable with such a large administrative record. These documents (RI, FS, TMSRA, and TMSRA RA) are listed at the bottom of page 11 under Administrative Record, but are not clearly identified as the most applicable documents.	The text was revised as follows: "The administrative record includes such documents <i>such</i> as the Final Remedial Investigation Report, Final Feasibility Study Report, <i>the final Five Year Review Report</i> , TMSRA, and its radiological addendum, <i>that are central to understanding the need to revise the remedy at Parcel B.</i> The administrative record also contains as well as other supporting documents and data for Parcel B.
12.	---	Please change all verbs in the Preferred Alternative Section from "would" and "would be" to "will" and "will be".	The use of "would" is appropriate because the remedy has not yet been selected. The remedy may change as a result of community comments or additional feedback from the regulatory agencies, therefore, the degree of determination implied by "will" is inappropriate in the proposed plan. The proposed plan was not changed as a result of this comment.
SPECIFIC COMMENTS			
1.	---	<u>Introduction</u> Please change bullets 3 through 8 to read as follows: <ul style="list-style-type: none"> Screening, separating, and disposing of radioactive sources and radiologically-contaminated building materials, sewer lines, storm drains, 	The text was revised as follows: <ul style="list-style-type: none"> ➤ Removing soil in selected areas where concentrations of organic chemicals and metals are higher than the levels considered safe for human health and ecological receptors.

No.	Page	Comment	Response
		<p>and soil.</p> <ul style="list-style-type: none"> • Transporting excavated soil, sewer lines, and storm drains off site to an appropriate landfill. • Installing soil covers over the entire parcel to prevent contact with any metals and over a portion of (see comment letter) IRs 7 and 18 to prevent possible radiological sources from being excavated. • Operating a soil vapor extraction (SVE) system to remove and treat volatile organic compounds (VOC) in soil at IR 10, Building 123. • Building a shoreline revetment in required areas to protect ecological receptors from chemicals in shoreline sediments. • Treating groundwater by injecting chemicals to break down the contaminants at IR 10, Building 123. • Implementing a groundwater monitoring program to verify that remediation has met the objectives in this Proposed Plan. • Using engineering controls to limit exposure to contaminated soil and institutional controls (IC) to limit exposure to contaminated groundwater by restricting specified land uses and activities on the parcel. (See the insert on page x for more details on ICs). 	<ul style="list-style-type: none"> ➤ Installing covers over the entire parcel to prevent contact with any metals or radiological contaminants that are not excavated. ➤ Surveying and decontaminating buildings, former building sites, sewer lines, and other areas affected by radiological sources. ➤ Screening, separating, and disposing of radioactive sources and radiologically contaminated materials and soil. ➤ Transporting excavated contaminated soil and materials off site to an appropriate landfill. ➤ Operating a <i>soil vapor extraction (SVE)</i> system to remove and treat <i>volatile organic compounds (VOC)</i> in soil at <i>Installation Restoration (IR)</i> Site 10. ➤ Building a shoreline <i>revetment</i> in required areas to protect ecological receptors from chemicals in shoreline sediments. ➤ Treating groundwater at IR Site 10 by injecting chemicals to break down the contaminants. ➤ Implementing a groundwater monitoring program to verify that remediation efforts meet the <i>remediation goals</i> defined in the amended ROD. ➤ Using <i>engineering controls (EC)</i> and <i>institutional controls (IC)</i> to limit exposure to contaminated soil and groundwater by restricting specified land uses and activities on the parcel. (See the insert on pages 17 and 18 for more details on ICs).
2.	---	<p><u>The CERCLA Process</u> 4th Paragraph, item (5) should read, “the findings from surveys and removal actions conducted to address radiological contaminants identified by a historical radiological assessment (HRA).”</p>	The text was revised as suggested.
3.	---	<p><u>The CERCLA Process</u> Historical radiological assessment (HRA) should be added to the Glossary of Technical Terms.</p>	Definitions for HRA and radiologically impacted were added to the glossary.
4.	---	<p><u>Parcel B History</u> Please add this sentence to end of 3rd paragraph - “Subsurface materials consist of shallow fill, upper and lower sands, Bay Mud, and Bedrock.”</p>	The text was added as follows: “ <i>Subsurface materials at Parcel B include fill, native sediments (such as sand and the Bay Mud), and bedrock.</i> ”
5.	---	<u>Activities at Parcel B since the 1997 ROD</u>	A new heading titled “ <i>Overview of Site Conditions</i> ” was added following

No.	Page	Comment	Response
		Please change title to - ACTIVITIES AT PARCEL B SINCE THE 1997 ROD AND CURRENT SITE CONDITIONS	the section “Activities at Parcel B since the 1997 ROD.”
6.	---	<u>Activities at Parcel B since the 1997 ROD</u> Please change 4th sentence in 1st paragraph to read – “These activities have resulted in an increased understanding of soil and groundwater at Parcel B and provided the new information on where contaminants remain and supports the need to amend the ROD.”	The text was revised as follows: “These activities have resulted in an increased understanding of soil and groundwater at Parcel B, <i>including the location of remaining contaminants</i> , and provided the new information that supports the need to amend the ROD.”
7.	---	<u>Activities at Parcel B since the 1997 ROD</u> Lead and PAHs in Soil – Locations where lead and PAHs are present at concentrations exceeding remedial goals should be identified and the planned removal or risk management actions described.	The following text was added to the new section “Overview of Site Conditions.” <i>“In addition to the characterization activities for soil discussed above, the Navy identified three small areas where soil contains lead or polycyclic aromatic hydrocarbons (PAH) resulting from Navy activities. The proposed remedial alternatives address these chemicals in soil. The Navy has monitored groundwater at Parcel B quarterly since 1999. Monitoring results further defined the locations of chemicals in groundwater, including VOCs at IR Site 10, mercury at IR Site 26, and other metals at various locations. The proposed remedial alternatives address these chemicals in groundwater.”</i>
8.	---	<u>Activities at Parcel B since the 1997 ROD</u> Methane – please change 2nd sentence to – “The Navy completed a survey of methane and VOC vapors in soil throughout IR Sites 7 and 18.”	The text was revised as suggested.
9.	---	<u>Activities at Parcel B since the 1997 ROD</u> Include a heading and paragraph for VOCs in Groundwater . The Navy should also discuss the groundwater monitoring performed at Parcel B and the results of such monitoring. The location and nature of plumes, including their sources, identified in previous documents should be discussed, including the chromium VI plume at IR 10 and the plume at Building 134 on Parcel C which may affect Parcel B.	Please refer to the response to Specific Comment 7 for the text that was added to describe groundwater. A new heading was not added.
10.	---	<u>Human Health Risk Assessment (HHRA)</u> Please change second paragraph to – “The redevelopment plan from the San Francisco Redevelopment Agency outlines the proposed reuses for Parcel B. The redevelopment plan divides Parcel B into reuse areas (see Figure 3). The expected long-term uses include research and development, mixed use, educational/cultural, and open space. The Navy evaluated the uses using residential (research and development and mixed use), industrial	The text was revised as follows: “The redevelopment plan from the San Francisco Redevelopment Agency outlines the proposed reuses for Parcel B. The redevelopment plan divides Parcel B into <i>reuse areas</i> redevelopment blocks, each with its own reuse (see Figure 4). The expected long-term uses include research and development and mixed use (<i>including residential</i>), educational/cultural, and open space. <i>The Navy evaluated these reuses using</i> were evaluated by

No.	Page	Comment	Response
		(educational/cultural), and recreational (open space) exposure scenarios.”	residential (research and development and mixed use blocks), industrial (educational/cultural block), and recreational (open space blocks) exposure scenarios.”
11.	---	<u>Human Health Risk Assessment (HHRA)</u> Please change the 1st sentence in paragraph six to read – “The risk assessment for soil indicated cancer risks greater than 10 ⁻⁶ or noncancer hazards greater than 1 at nearly all areas (see Table 1 on page x).”	The text was revised as follows: “The risk assessment for soil indicated cancer risks greater than 10 ⁻⁶ or noncancer hazards greater than 1 at nearly all reuse areas redevelopment blocks (see Table 1 on page 7).”
12.	---	<u>Human Health Risk Assessment (HHRA)</u> Please change the 3rd sentence in paragraph six to read – “The risk assessment for groundwater estimated cancer risks greater than 10 ⁻⁶ or noncancer hazards greater than 1 for approximately half the parcel (see Table 2 on page x).”	The text was revised as follows: “The risk assessment for groundwater estimated cancer risks greater than 10 ⁻⁶ or noncancer hazards greater than 1 at seven of the 15 redevelopment blocks, <i>mostly in residential reuse areas</i> (see Table 2 on page 7).”
13.	---	<u>Human Health Risk Assessment (HHRA)</u> Please add this sentence at the end of paragraph seven – “Risks following remediation will be below 10 ⁻⁶ for cancer risks and/or below 1 for noncancer hazards.”	Please refer to the response to General Comment 3. The proposed plan was not changed as a result of this comment.
14.	---	<u>Remedial Action Objectives – Soil and Sediment</u> Specific, numeric Remedial Goals for each of the soil gas COCs should be set forth in the Proposed Plan – not delayed until the Remedial Design.	Cleanup goals for VOCs in soil gas were clarified to indicate that the remediation goals for soil gas will correspond to a cancer risk of 10 ⁻⁶ . However, numeric goals for VOC will not be established in the proposed plan. A soil gas survey conducted following the remedial actions will provide data to establish numeric goals for VOCs in soil gas, which will be used to evaluate the need for additional action or ICs. In some areas, site-specific pre-remediation soil gas surveys may be necessary to support the RD.
15.	---	<u>Remedial Action Objectives – Soil and Sediment</u> Please change list 1. (a) to read as follows: (a) Ingestion of, outdoor inhalation of, and dermal exposure to soil <ul style="list-style-type: none"> • From 0 to 10 feet below ground surface (bgs) for residents in research and development and mixed-use reuse areas • From 0 to 10 feet bgs for industrial workers in the educational/cultural reuse area. • From 0 to 2 feet bgs for recreational users in open space reuse area. • From 0 to 10 feet bgs for construction workers. 	The text was revised as suggested.
16.	---	<u>Remedial Action Objectives – Radiologically Impacted Soil and Structures</u> The Preliminary Remediation Goals for radioisotopes should be listed in a table	A new table (Table 6) was added to present preliminary remediation goals for radionuclides.

No.	Page	Comment	Response
		just like the Preliminary Remediation Goals are listed for soil, sediment and groundwater.	
17.	---	<u>Summary or Remedial Alternatives</u> Should be titled “Summary of Remedial Alternatives Evaluated”	The proposed plan was not changed as a result of this editorial comment.
18.	---	<u>Remedial Alternatives for Radiologically Impacted Soil and Structures</u> Consistent with our first general comment and questions raised in specific comment 28 - please change the second paragraph , second sentence to “A demarcation layer will be installed on the surveyed soil surface before covers are constructed over a portion of IR Sites 7 and 18 to mark the boundary between the existing surface and a new ?? foot deep soil cover.	The text was revised as follows: “A demarcation layer would be installed on the surveyed soil surface before covers were constructed at IR Sites 7 and 18 to mark the boundary between the existing surface and a new 2-foot-thick soil cover.”
19.	---	<u>Remedial Alternatives for Radiologically Impacted Soil and Structures</u> Please change the last paragraph to read “Institutional controls are an integral component of every remedial alternative and Insert 1 on page x provides an Overview of Institutional Controls common to all the alternatives.	The text was revised as suggested.
20.	---	<u>Preferred Alternatives, Soil</u> First paragraph, sentence nine – please change to “An SVE system will remove VOCs from soil at IR-10, Bldg 123.”	The text was revised as follows: “An SVE system would remove VOCs from soil at <i>IR Site 10 Redevelopment Block 8.</i> ”
21.	---	<u>Preferred Alternatives, Soil</u> First paragraph, sentence 10 – please change to “A soil gas survey would be conducted in areas of concern during the remedial design phase to evaluate the potential for vapor intrusion and the need for additional remediation.”	The text was revised as follows: “A soil gas survey would be <i>conducted following the remedial actions to provide data to establish numeric goals for VOCs in soil gas which will then be used to evaluate the need for additional action or ICs. In some areas, site-specific pre-remediation soil gas surveys may be necessary to support the RD across the parcel during the remedial design phase to evaluate the potential for vapor intrusion, set remediation goals for soil gas, and assess the need for remediation and/or ICs.</i> ”
22.	---	<u>Preferred Alternatives, Soil</u> First paragraph, sentence eleven – please change to “A shoreline revetment will be constructed along shoreline areas that do not have seawalls in place to protect ecological receptors from chemicals in shoreline sediments.”	The use of redevelopment blocks and IR sites more accurately describes the proposed location for the shoreline revetment. The text was revised as follows: “A shoreline revetment would be constructed along Redevelopment Blocks BOS-1 (<i>at IR Site 7</i>) and BOS-3 (<i>at IR Site 26</i>) to protect ecological receptors from chemicals in shoreline sediments.”
23.	---	<u>Preferred Alternatives, Soil</u> Please add a sentence at the end of the paragraph about the RMP. We suggest “The RMP will address modification of soil covers, as well as other issues, and	The following text was added to the discussion of the preferred alternative for soil to describe ICs and the RMP: “ <i>Following these activities, the Navy and regulatory agencies will</i>

No.	Page	Comment	Response
		approval of the RMP by the Navy and regulators will constitute approval of the activities described in the RMP, provided procedures described in the approved RMP are followed.”	<p><i>implement ICs for the continued protection of public health and the environment and to ensure the integrity of the containment remedies (for example, soil covers and shoreline revetment). ICs are specified in legally binding Quitclaim Deeds and covenants to restrict use of property. The insert on pages 17 and 18 provides an overview of ICs</i></p> <p><i>A risk management plan (RMP) will be prepared by the City and County of San Francisco and approved by the federal facility agreement (FFA) signatories (EPA, DTSC, and the Water Board). The RMP will specify soil and groundwater management procedures for implementation of the ICs during redevelopment and future operation and maintenance of the soil and groundwater remedies. The RMP will identify the roles of local, state, and federal government in administering the RMP and will include, but not be limited to, procedures for any necessary sampling and analysis requirements, worker health and safety requirements, and any necessary site-specific construction or use approvals that may be required. The insert on pages 17 and 18 contains more details about ICs.</i></p> <p>However, the issue of whether approval of the RMP by the Navy and the regulatory agencies constitutes approval of all actions consistent with the RMP remains under discussion and will be further clarified in the amended ROD or in the RMP itself.</p>
24.	---	<p><u>Preferred Alternatives, Soil</u></p> <p>Please remove the sentence “Future landowners would need approval from the Navy and regulatory agencies to modify soil covers”. It is incorrect and contradicts months of negotiations on the Institutional Control language and RMP concepts.</p>	The text was deleted as suggested.
25.	---	<p><u>Preferred Alternatives, Groundwater</u></p> <p>Please change first sentence to read “This alternative will achieve RAOs by actively treating VOCs in groundwater using an injected biological substrate to destroy the VOCs in the groundwater plume located under Building 123.”</p>	<p>Much of the groundwater plume near Building 123 is not beneath the building, but is north of the building. The text was revised as follows: “This alternative would achieve RAOs by actively treating VOCs in groundwater using an injected biological substrate to destroy VOCs in the groundwater plume near IR Site 10 (in Redevelopment Blocks 8 and 9).”</p>
26.	---	<p><u>Preferred Alternatives, Groundwater</u></p> <p>The Navy states “Risks in these other areas of Parcel B were based on groundwater samples collected many years ago and new samples will be collected from these locations to evaluate whether remediation is still needed.” Don’t you have current data that already show that the risk is no longer an issue? And, if so, can’t you state that in this Proposed Plan?</p>	Current data are not available. The proposed plan was not changed as a result of this comment.

No.	Page	Comment	Response
27.	---	<p><u>Preferred Alternatives, Radiologically Impacted Soil and Structures (Alternative R-3)</u></p> <p>Consistent with our first general comment – please change all references of IR7/18 to read “a portion of IR7/18” – in order to make it clear to the reader that the actual boundaries of the restriction will be based on the area of possible contamination and not artificially extended to a boundary that is unrelated to the possible contamination.</p>	<p>Please refer to the response to General Comment 1. The proposed plan was not changed as a result of this comment.</p>
28.	---	<p><u>Preferred Alternatives, Radiologically Impacted Soil and Structures (Alternative R-3)</u></p> <p>The Navy references closure of the Building 140 pump shaft, using “backfilled stone and a concrete cap.” Please explain how the proposed stone will be incorporated into the closure, and whether the stone will be in a concrete matrix, or whether the stone will be porous, thus leaving the concrete cap as the only real barrier in the shaft. Also, please identify the proposed thickness of the concrete cap, as you have for the soil cover for portions of IR Sites 7 and 18.</p>	<p>Details of the closure of the pump shaft beneath Building 140 will be provided in the RD. The proposed plan was not changed as a result of this comment.</p>
29.	---	<p><u>Preferred Alternatives, Radiologically Impacted Soil and Structures (Alternative R-3)</u></p> <p>The proposal for the design of the IR7/18 demarcation layer and two feet of clean fill needs to be reconsidered. We are concerned that if the notification requirements that will be spelled out in the RMP for this area are not followed, a failure of the Institutional Control may result. Specifically, the RMP will require notification in a timely manner to the Navy and regulatory agencies when the demarcation layer is accidentally broken. We think two feet of fill and a layer that is easily cut by backhoes is not robust enough. We envision a scenario where employees with backhoes cut through and ignore the demarcation layer, orange snow fencing or the like, because they don’t realize the significance of the layer. With only two feet of fill on top of the fencing, we are concerned that RMP notice procedures would not be followed in a timely manner.</p> <p>We propose that if the Navy wishes to only install two feet of fill, then they will need to install a demarcation layer that causes some physical obstruction to backhoes – possible materials might be medium sized pieces of recycled concrete or other materials that would make a loud noise when hit by a backhoe (e.g chain link fence, other indestructible mesh material etc). Another design modification could be that the Navy could install a greater depth of fill so that the likelihood of disruption of the demarcation layer is lessened if not</p>	<p>A cover using 2 feet of clean fill, together with ICs to maintain the cover integrity, are sufficient to protect human health and the environment from exposure to chemicals of concern (including radionuclides) at IR-07 and IR-18.</p> <p>Details of the material to be used for the demarcation layer will be selected during the RD.</p> <p>The proposed plan was not changed as a result of this comment.</p>

No.	Page	Comment	Response
		eliminated. We think at least three feet of fill would be required.	
30.	---	<u>Glossary of Technical Terms</u> Please add “Engineering Control” and “Historical Radiological Assessment” to your glossary	Definitions for the HRA and ECs were added to the glossary.
31.	---	<u>Figure 3</u> Please revise Figure 3 by adding the reuse area designations and making those designations more prominent than the redevelopment blocks. See also redline version for revisions to text to reflect this change.	A new figure illustrating IR sites and reuse areas was added (Figure 4). Figure 3 was not changed. Please also refer to the response to General Comment 2.
32.	---	<u>Insert 1</u> Please see attached redline edits for Insert 1.	Please refer to the draft final proposed plan for the updated text describing ICs.