City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Mark Farrell, Mayor
Barbara A. Garcia, MPA, Director of Health
Stephanie K. J. Cushing, MSPH, CHMM, REHS
Environmental Health Director

March 7, 2018

Mr. Derek Robinson
BRAC Environmental Coordinator, Hunters Point Shipyard
Base Realignment and Closure
Program Management Office West
33000 Nixie Way, Bldg 50 Suite 207
San Diego, CA 92147

Subject: **SFDPH Comments on the Draft Radiological Data Evaluation Findings Report for Parcel C Soil, Former Hunters Point Naval Shipyard, San Francisco, California, Dated November 2017**

Dear Derek:

General Comments:

1. We understand that the Navy will, as appropriate, incorporate comments received on the Findings Report for: a) Parcels B and G Soil, and b) Parcels D-2, UC-1, UC-2, and UC-3 Soil; therefore, relevant comments have not been duplicated in this letter.
2. Based on the results of the evaluation of Parcel C Soil data, the Navy recommends confirmation sampling at 28 trench units and 94 fill units. Remedial actions involving excavation of CERCLA hazardous substances were extensive at Parcel C; therefore, some trench and fill units may no longer exist (i.e. the soil in question might have been already removed and disposed of in later non-radiological remediation work). For example, soil removal at Excavation Area 22-1 was conducted up to 15 feet below ground surface and may include significant portions of SUs 242, 243, and 238. We recommend that the Navy account for these prior excavations when planning for confirmation sampling.

Specific Comments

3. **Section 4.1.1.2, Recommended for Confirmation Sampling, Trench Unit 304, page 4-14:** Please clarify the significance of the second full paragraph starting "Although sample results..." What is the implication of sampling two areas on the same date and time period? Is this infeasible?

Minor Comment

1. **Excavated Soil Unit 516, page 4-24:** Typo. Delete extraneous "to". "...2 biased samples ~~to~~..."

HUNTERS POINT SHIPYARD PROGRAM
1390 Market Street, Suite 410, San Francisco, CA 94102
Phone 415-252-3967 | Fax 415-252-3889

Sincerely,

Amy D. Brownell

Amy D. Brownell, P.E.
Environmental Engineer

cc: Patrick Brooks, Navy
Danielle Janda, Navy
Jamie Egan, CB&I
Lily Lee, USEPA
Karla Brasaemle, TechLaw
Nina Bacey, DTSC
Daniel Tanyoue, RWQCB
Hilde Myall, OCII
Kasheica McKinney, OCII
Randy Brandt, Geosyntec
Christina Rain, Langan

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