Response to DTSC Email Comments

Response to DTSC email comments dated 26 October 2016			
Item	**Section**	**Comment**	**Response**
1	1.1	Section 1.1 should include a language indicating that the site remediation goals will be re-evaluated a minimum of once every five years. DTSC management has requested that the reference to evaluation and possible update of RGs must be included in the text of this RMP.	We recognize that the Navy will review the protectiveness of the remedy for each parcel, including RGs, during the CERCLA five-year review process. We added a footnote in section 1.4 (modifications to the RMP) acknowledging the Navy's five-year review requirement. The potential future update of RGs, however, is not relevant to the scope of the RMP, discussed in Section 1.1. An update to RGs would not itself result in a modification to any required soil handling protocols. In the event of discovery of an unexpected condition, the Owner may need to refer to RGs, which would be the updated RGs, by definition. No changes will be made to this section; however, a note referencing the five-year review was added to Section 1.4.
2	2.1.4 (Now in 4.2.1)	States *"……areas with naturally occurring metals above RGs are not subject to the special soil handling and management protocols…."* I was unable to find this language in the ROD. The ROD was clear that the naturally occurring or "ubiquitous" metals in soil may pose an unacceptable risk to human health and, therefore, durable covers were required to prevent exposure. These metals are subject to soil management protocols, but not subject to Section [4.2.1]. Please revise.	The full sentence as written accurately stated that the special protocols described in Section [4.2.1] do not apply to areas with only naturally occurring metals above RGs. These areas are of course subject to the general soil management protocols of the RMP, which include placement beneath a durable cover (Section 3.4). For clarity, the sentence has been revised as follows and included in Section 4.2.1:

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			(Note that naturally occurring metals exist at levels above RGs at various locations throughout the site, but only the discrete areas as identified in Appendix C for each Parcel are subject to Section [4.2.1])
3	2.3.1 (Now in Appendix C)	Parcel B-1 – Plutonium 239 should be included in the list of ROCs as indicated in Table 5-5 of the ROD Amendment.	Plutonium 239 will be included in the ROC list.
4	2.3.1.1 (Now in Appendix C)	Chromium should be included as a COC in groundwater as indicated in Section 2.3.1.	The 2017 Final Remedial Action Completion Report for Parcel B-1 states, "During development of the RD (ChaduxTt, 2011 and 2012), including the Remedial Action Monitoring Plan, more recent groundwater data (collected after the ROD was published) were evaluated and it was determined that chromium VI is no longer a COC in groundwater at Parcel B-1; therefore, it was not addressed by the RA nor included in the post-RA monitoring program." Therefore, chromium VI is excluded in the RMP from the list of COCs in groundwater. No change will be made to this section.
5	2.3.1.3.4 (Now in Appendix C)	This section is not clear and misleading because it indicates there are no COCs remaining in soil above RGs (this is the same for all other parcels listed in the RMP). I'm thinking this is just a mistake because it contradicts with the conclusion of the RACRs and what is now stated in the draft and final CRUPs. Per the draft CRUPs of each of the Parcels, COCs remain in soil and exceed the RGs, including naturally occurring/ubiquitous metals. As indicated in the draft and final CRUPs, the following COCs remain in soil above RGs:	See response to DTSC comment 2 above. The RMP is not intended to define COCs and we have made edits throughout to avoid confusion and to be consistent with the RACR and FOST. In addition, and for clarity, we have globally deleted sections describing special categories for each parcel where there are no applicable areas in the parcel (including this section).

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Item	**Section**	**Comment**	**Response**
		- Parcel B-1 - Metals, VOCs SVOCs, pesticides, polychlorinated biphenyls (PCBs), total petroleum hydrocarbons (TPH) - CRUP G – metals and SVOCs - UC1 & 2 - Metals - Lots 1 & 3 - Metals, VOCs SVOCs, pesticides, and polychlorinated biphenyls (PCBs) These COCs are in addition to that described in Section [4.2.1] and Section [4]. Section [4.2.1] states "In some discrete locations on the Site, the FFA Signatories have approved COCs to remain safely in the soil beneath a Durable Cover at concentrations above the ROD Remediation Goals (RGs; see Parcel specific ROD) and the Petroleum Preliminary Strategy Criteria (PSC; Shaw, 2007)". The soil of these discrete locations appears to be those areas under specific buildings on Parcels B-1 and G. These areas will be addressed by the Section [3.4] Soil Management Protocols. However, the rest of the soils throughout the site that exceed the COC RGs must be addressed with soil management protocols also. However, they are not subject to Section [4.1]. All sections that discuss remaining COCs in soil above RGs must be corrected.	
6	2.3.2.2 (Now in Appendix C)	1st paragraph, indicates installation of soil gas probes as one of the remedy features. However, I was unable to locate this in the ROD. Please verify.	Soil vapor monitoring for methane was a feature of the IR-7/18 Lot 2 remedy only; therefore, the reference will be removed from the paragraph. According to the FOST, the Navy decommissioned the methane probes in Lot 2 in 2012.
7	3.1 (Now 2.1)	Bullet #[4] indicates that a durable cover must be restored over a development site within five years of removal of the previously existing durable cover.	As noted, the FFA signatories agreed to the five-year limitation parameter based on many factors and substantial discussion (see November 2014 DTSC comment

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		Although the FFA signatories have agreed in the past to this time period with conditions (soil management protocols (protocols) as detailed in Section [4.2.1]), the FFA signatories are concern[ed] that the protocols may not be diligently followed or met. Therefore, DTSC is requesting the following language be added to this bullet: If oversight agencies find that soil management protocols as described in Section [4.2.1] are not being met, then the 5-year period can be reduced or eliminated by the FFA signatories. (If this modification is not acceptable, then DTSC no longer agrees to the 5-year period and this issue will need to be reevaluated with all parties).	5b and response, October 2015 EPA comment 12 and response, and September 2014 RWQCB comment 1 and response). The restricted activities authorized with conditions may proceed only insofar as protocols are being followed or met. Therefore, in the event protocols are not diligently being followed or met, the FFA Signatories have enforcement tools. Notably, DTSC can require the Owner to modify or remove Improvements to the extent necessary to correct violations (see UC-1 and UC-2 CRUP § 5.01). In other words, DTSC already has the power to shorten the five-year period in any case in which the relevant protocols are not diligently followed. As discussed during the 5/17/17 meeting, language has been added to Dust Control Plan Sections 4.2 and 5.2.2 (Appendix G) to clarify additional action to be taken during weekends and holidays in the event that high sustained winds are predicted.
	Appendix F (now Appendix G)	**Follow-up Comment, dated 5/18/17**: DTSC is willing to accept the response provided if revisions to the Appendix [G]~~F~~ dust monitoring plan, as discussed in the May 17, 2017 Property transfer meeting, are made to address our concerns. a. In the event of forecast for high winds during inactive periods (e.g. weekends or holidays), areas with no durable cover or other stabilization will be stabilized during that period, e.g. the use of soil palliative/tackifier should be sprayed on working surfaces, bare ground, and active stockpiles. Revisions to Appendix [G]~~F~~ should include Section 4.2. b. Additionally, revisions should be made to Section 5.2 to ensure that dust monitoring includes areas that are inactive.	Regarding the general issue raised by this comment—that the FFA signatories have previously agreed to a substantive component to the RMP but DTSC is requesting changes—please note that this is a site-wide RMP that was previously approved, and that changes going forward are appropriate only where necessary to add parcels or make important clarifications; not to add or materially adjust previously-approved substantive requirements. This framework has been fully discussed and agreed to by the FFA Signatories. For example: In EPA's 5/22/13 comment 2, EPA stated: "S*hipyard-wide RMP*. As stated in the City's transmittal email for the current version of the RMP, the RMP covers Parcel B only.

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Item	**Section**	**Comment**	**Response**
		DTSC Response to Comment 7, dated 23 May 2018 – DTSC finds the revisions made to Appendix [G~~F~~] Dust Monitoring Plan to address potential dust concerns during high winds periods and inactive fieldwork periods is acceptable. The response refers to DTSCs authority under section 5.01 in the UC-1 and UC-2 CRUP. This section is limited to DTSC's ability to require the Owner or Occupant to modify or remove "Improvements" to the Property to correct violations of the Environmental Restrictions. This section does not provide DTSC with the authority to reduce the five-year period of time given to remove the durable cover in the event that the soil management protocols are not followed. DTSC would like to remain on the record that allowing the durable cover to be removed for a period of five-years during redevelopment seems excessive and it may be difficult for the developer to maintain consistent dust controls over several uncovered acres for such a long period of time. Additionally, DTSC appreciates the acknowledgement that revisions to the RMP may be necessary in the future due to changing site conditions.	However, EPA understands that the next version of the RMP will be designed to be expanded to address all properties at the Shipyard except for those portions for which CDPH may require a radiological license. EPA believes that negotiating a separate RMP for each Shipyard parcel (which number more than ten) to be unnecessarily burden[some]." EPA further noted in comment 10 "It is important to finalize the RMP even if significant property transfers are not anticipated for several years…. The FFA Signatories and the City must be able to provide the general public full assurance that we have a solid plan that will ensure protectiveness of all the selected remedial actions through the Shipyard redevelopment project and thereafter." In its 8/12/14 comment, the RWQCB asked to clarify: "Is this RMP envisioned as a template for developing separate RMPs for each parcel?" and the response made clear: "All parcels will be included under one RMP. . . . Prior to each Parcel transfer, ~~Section 2.0~~[Appendix C] Environmental Conditions and Figure 1-1 will be updated with all applicable information and submitted to the FFA signatories for approval." In DTSC's 11/12/14 comment 3, DTSC noted: "DTSC suggested at the 10/23/2014 meeting that all updateable sections of the RMP be moved to an appendix, and that the appendix would be updated and distributed as needed." In Revision 0, the "updateable sections" were located in Section 2 for various reasons. However, upon further

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Item	**Section**	**Comment**	**Response**
			reflection, and to help ensure this previously-agreed upon framework is clear in the future, we have taken DTSC's prior suggestion and moved the Parcel-specific information that is subject to revision (e.g., addition of future parcels) to a new Appendix C.
8	3.3 (Now 1.4)	Please add text indicating that evaluation and update of RGs will occur a minimum of every five years. DTSC management has requested that the reference to evaluation and possible update of RGs must be included in the text of the RMP.	Please see response to DTSC comment 1. We have added a footnote acknowledging the Navy's obligation to perform five-year reviews.
9	4.2 (Now 2.2.2)	Remove the forty-five day time period for FFA signatories' review of a restricted activities work plan. A time limit should not be indicated in the RMP. **Follow-up Comment** dated 5/18/17: DTSC will accept the 45-day review period for FFA signatories if language is added that an extension will be allowed if requested within that time period.	The 45-day timeframe was previously approved in version 0 of the RMP. As discussed during that approval process, including a timeframe is crucial for planning purposes. We expect all parties to communicate early and often if the designated timeframe cannot be met in any particular instance. Note we are not proposing that a workplan would be deemed approved if comments are not received within the 45-day period. The proposed language has been added as a footnote to Section 2.2.2. Regarding substantive changes to RMP requirements, please see response to DTSC comment 7.
10	4.2 (Now 2.2.2)	- Work plan - Add bullet – RGs to be used if an unexpected hazard is found as described in Section ~~5~~ [3.8] of the RMP. This may include evaluation and update of the RGs if necessary (to be done a minimum of every five years). - Completion report – add bullet – all soil and groundwater analytical laboratory reports for both confirmation/investigations samples if necessary and waste screening samples.	Work Plan – As noted in response to DTSC comment 1, in the event unexpected conditions are discovered, the Owner may need to refer to RGs (which are, by definition, current RGs, including any updates that have been made by the Navy) in implementing the UCRP. The bullets already contain a reference to implementation of RMP plans, which include the UCRP.

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Item	**Section**	**Comment**	**Response**
			Completion Report – The inclusion of analytical laboratory reports has been added to bullet 5 of the Completion Report elements.
11	4.3 (Now 2.2.3)	Note - Requests to modify VOC ARIC areas after transfer from the Navy to a new RP will be subject to DTSC soil vapor intrusion guidelines and SGALs will most likely need to be reevaluated at that time.	Comment noted. No changes have been made in response to this comment.
12a	5.4.1 (Now 3.4.2)	Stockpiles that are to be reused on a parcel/site must be clearly labeled/posted so that stockpiles remain within a parcel and are not used as fill on another parcel (as indicated in Section [4.2.1]). Please add text to indicate appropriate labeling of stockpiles for reuse.	As noted in Section [2.1] (bullet 2) of the RMP, the general movement of soil is allowed during development activities as long as it remains beneath the durable cover. Section [4.2.1] includes special protocols for certain areas, including a requirement to segregate stockpiles, and these are to be labeled in accordance with [3.4.2]. The fifth sentence of the first paragraph in Section [3.4.2] already states that the stockpiles will be labeled. No changes have been made to this Section in response to this comment. Also see response to Water Board comment 9.
12b	5.4 (Now 3.4)	Follow-up email from Nina Bacey (11/16/16): I discussed the issue of moving soil beneath the durable cover between parcels with my management and the previous project manager. DTSC will allow the movement of soil between parcels. However, as we discussed in the last property transfer meeting [11/2/16], if soil from commercial use areas is to be reused, it must remain within commercial use areas. This should be included in the final Risk Management Plan.	Comment noted. The language added to Section [3.4.1] (new second paragraph in the Revision 1 draft) addresses the prohibition on movement from commercial areas to residential areas.

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Item	**Section**	**Comment**	**Response**
13	5.4.2 (Now 3.4.3)	Please clarify that this section applies to all areas of the site.	Correct. As noted at the outset of Section [3] (and throughout the RMP), compliance with the protocols described in Section [3] is required to engage in restricted activities authorized with conditions. The Section [4] requirements apply only to certain areas of the site, but this is expressly noted for each such requirement.
14	5.4.3 (Now 4.2.1)	Indicates areas with COCs in soil above ROD RGs remain at the site and these areas are identified in [Appendix C]. This information is not in [Appendix C]. This section also implies that only those areas beneath the buildings in Parcels B-1 and G need follow this protocol. This is not correct because COCs in soil that exceed RGs remain throughout the site. See comment #5. Please revise accordingly.	The references to Section 2.2 were in error and will be corrected to reference Appendix C (Summary of Environmental Site Conditions) in this section as well as throughout the RMP. Please see response to comments 2 and 5, above. No additional revisions were made to the text based on this comment.
15	5.8.2 (Now 4.4.1-4.4.3)	The Activity Specific Work Plan for VOC ARIC area may require sampling of soil vapor data so that current conditions can be used for the proposed engineering controls. The text indicates the most current data must be used, however, if the most current data is greater than 12 months, sampling of groundwater and/or soil vapor will be required prior to approval of an engineering design to prevent vapor intrusion. This should be noted in the text. **DTSC Response to Comment 15, dated 23 May 2018** – DTSC disagrees with the response. Current soil gas concentrations will be necessary even if a decision is made to move forward with the conservative approach of installing a vapor mitigation system to prevent the potential for vapor intrusion. Current concentrations are needed to determine the	We agree that if the goal is to reduce the VOC ARIC to limit the scope of the remedy or remove mitigation as an option to address the potential for vapor intrusion, soil vapor sampling and a risk evaluation would be included as part of the Activity Specific Work Plan for the construction of a building within a VOC ARIC. However, more recent data would not be necessary if the decision is made to move forward with the conservative approach of installing a vapor mitigation system (e.g., passive venting of the sub-slab space) to prevent the potential for vapor intrusion. If implemented, only system would be proposed to show that the system is operating properly. No additional revisions were made to the based on this comment. **Revised Response, July 2018**:

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Item	**Section**	**Comment**	**Response**
		appropriate vapor mitigation system necessary (e.g., passive or active) prior to installation of a system. DTSC will not be able to approve a work plan in a VOC ARIC area without current (i.e., less than 12 months) sampling data results. **Follow-up email from N. Bacey, dated 30 May 2018** – I have gone through revised Sections 4.4.1 through 4.4.3. I believe the revisions are fine. When an Activity Specific Work Plan is submitted for review, if DTSC believes current soil vapor concentrations are needed, they will be requested at that time. DTSC has no further comments on Item 15 of the RTCs (was Section 5.8.2, now 4.4.1-4.4.3).	We agree that if the goal is to reduce the VOC ARIC to limit the scope of the remedy or remove mitigation as an option to address the potential for vapor intrusion, soil vapor sampling and a risk evaluation would be included as part of the Activity Specific Work Plan for the construction of a building within a VOC ARIC. However, more recent data may not be necessary if the decision is made to move forward with the conservative approach of installing a vapor mitigation system (e.g., passive venting of the sub-slab space) to prevent the potential for vapor intrusion. If the decision to design and install a vapor mitigation system is made, the need for conducting baseline soil vapor sampling prior to system startup to provide a basis by which to evaluate the adequacy of the system design would be discussed with the regulatory agencies. The soil vapor sampling plan or the justification not to conduct sampling will be presented in an Activity Specific Work Plan which will be submitted for agency comment and/or approval. Section 4.4.1 was revised to include a sentence stating the above.
16	5.8.3 (Now 4.3.3 & 4.4.1)	See comment for Section [4.4.1]. This should be applied throughout the document.	As noted above, we agree that additional soil vapor sampling would be conducted if the goal is to avoid the use of mitigation measures within a trench or conduit that is within a certain radial distance of a groundwater monitoring well or VOC ARIC. As noted in these sections and the approved Restricted Activities Work Plan for the Artists' Building construction, any installation through or above a VOC-ARIC includes mitigation of trenches and conduits to prevent vapor intrusion through these potential pathways. However, if the decision is to

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Item	**Section**	**Comment**	**Response**
			implement the mitigation measures in these areas an evaluation of existing or additional data will not be necessary. No revisions were made to the text based on this comment.
17	Table 2-1 (Now Table C-1 in Appendix C)	See comment for Section 2.3.1.3.4. Table indicates there are no areas with COCs in soil above RGs. This is incorrect.	The special protocol is applicable only to the identified, discrete areas. For clarity, these soil management areas are called: *Soil with COCs in above RGs or PSC* This has been corrected in Table C-1 and in the titles for Sections [4.2.1] and in Appendix C, if applicable for each parcel.
18	Figures	Figures must be corrected per comment #5.	See responses to DTSC comments 2 and 5. No revisions were made to figures based on this comment.
19	Appendix [G] – 4.4.1	#6 indicates the area of excavation should be limited. Clarification is needed. What are the criteria for this? Is there a maximum area size?	This is a best management practice for dust control, not a regulatory requirement. While there is no maximum area, because work will be conducted in phases the practice is to excavate or grade only the area that is needed. No revisions were made to the text based on this comment.
20	Appendix [G] – 5.2.2	Real-time particulate dust monitors will be required to meet the State of California ambient air quality standards. It should be clear in the text that state rather than national standards will be achieved. Please correct.	As noted in the text, both state and national ambient air quality standards (AAQS) are included for reference. For 11 years, we have achieved the state standard and will continue to do so. Language has been added to Appendix G, Section 5.2.2 for clarification. ~~No revisions were made to the text based on this comment.~~
21	Appendix [E] – 2.1, bullet 2 Category 2 Condition	Indicates if a Category 2 Condition is identified *"warrants coordination with the SFDPH in consultation with the FFA Signatories, as appropriate."* Upon transfer of the parcels from the Navy, DTSC will become the lead state agency with oversight	As originally designed and approved by the FFA Signatories, the UCRP process included notification at all pertinent steps to all FFA Signatories, and flexibility for DTSC to step in at any point to take the lead on oversight. As explained in Section 4, SFDPH would take the lead in

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Item	**Section**	**Comment**	**Response**
		responsibilities. DTSC does not defer to SFDPH. Please revise this section to include coordination with DTSC. This change should be reflected throughout the Unexpected Condition Response Plan.	oversight unless "SFDPH or the FFA Signatories determine on a case-by-case basis at any point in the process . . . that it is more appropriate . . . for specific work to be conducted under the oversight of a designated FFA Signatory. References to 'SFDPH' in this section are deemed to be references to the designated FFA Signatory in [such case.]" DTSC previously agreed to and approved this flexible approach. We will make the requested changes here (and below) if DTSC requires the process to automatically default to DTSC oversight. However, we encourage DTSC to reconsider as the original approach was designed to include more flexibility, potentially fewer DTSC resources, and no waiver of DTSC's rights or oversight. Accordingly, no change has been made at this time. In addition, regarding substantive changes to RMP requirements, please see response to DTSC comment 7.
22	Appendix [E] – 4, paragraph 5	States "if soil samples do not contain COPCs above ROD remediation goals Tier 1 Petroleum PSC, or RSLs if not listed in the ROD……." RSLs should be changed to DTSC modified screening levels. Once the property is transferred and DTSC becomes the lead state regulatory agency, DTSC modified screening levels (which include RSLs) should be used for contaminates not listed in the ROD. This change should be made throughout Section 4.	Comment noted; this change has been made.
23	Appendix [E] – 4.2, paragraph 3	This section describes comparing results of soil vapor sample analysis to the SGALs that were established for the site. It should be noted that SGALs along with all	Please see response to DTSC comments 1 and 8. SGALs or RGs that are used in implementation of the UCRP will be the current, updated numbers, by definition. For clarity and ease of reference, Table E-1 was added to Appendix E

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Response to DTSC email comments dated 26 October 2016			
Item	**Section**	**Comment**	**Response**
		RGs may need to be evaluated at that time, and at a minimum every 5 years. **Follow-up Comment** dated 5/18/17: The document will be revised, as discussed in the May 17, 2017 Property transfer meeting, so that it is clear that the most current SGALs will be used.	listing the current RGs and SGALs. The Navy will review and update any components of the remedy, including RGs or SGALs as needed during its five-year review process. Any such update would result in an update to the RMP, including Table E-1, which will be dated with the date of revisions, as noted in Section [1.4] of the RMP.
24	Appendix [E] – Flowcharts [E]-1 and [E]-3 Step 5E and 10A, respectively	These must include DTSC review, approval and oversight. DTSC does not defer to SFDPH.	See response to DTSC comment 21. Note that references to SFDPH in Flowchart E-3 are deemed to refer to DTSC in the event DTSC has taken the lead in oversight.
Response to GSU comments from Michelle Dalrymple, P.E. dated 26 October 2016			
1	GSU, Table [C-1]	It is not clear why some cells are empty and others have a hyphen symbol (-). Is that a function of the red-line?	The hyphens are a function of the redline and they will be removed in the final submittal.
2	GSU, Figures [C-1] and [C-3]	It is not clear what NFA, commingled means (green-shaded areas).	The NFA, commingled designation indicates that the site contained other CERCLA hazardous substances in addition to petroleum compounds.
3	GSU, Appendix [B]	*Contact Information*, they have used Ryan Miya's phone number rather than Nina Bacey.	This will be corrected to include the general contact number to the Berkeley Regional Office (510-540-2122) as Ms. Bacey may not be contact in the future.
4	GSU, Appendix [G], page [G-17], Number 3	The text states that a *trained geologist* will observe the rock and remove serpentinite rock for separate treatment and processing. It is recommended that a California professional geologist (PG) perform this work, or that the work be performed under direct supervision of a PG.	The first sentence will be revised as follows: *Water will be applied during any rock processing operations, and a trained geologist working under the direction of a PG will be present to observe …*

Response to DTSC comments dated 23 May 2018 (from Nina Bacey)			
Item	Section	Comment	Response
1	3.3	The first sentence in the second paragraph provides examples of routine property maintenance work, i.e., "e.g., irrigation installation or repair." However, in the second sentence in the second paragraph different examples are provided of routine property maintenance work that do not appear to be "routine," i.e., "e.g., major subgrade utility repairs, major building foundation modifications, etc."). DTSC's recommends that the examples in the second sentence be deleted for consistency and because DTSC does not consider these examples to be routine but instead would require a work plan and FFA approval prior to conducting major subgrade utility repairs and major building foundation modifications.	We agree that as written, there is inconsistency in defining what is routine maintenance in the first two sentences, and the examples in the second sentence have been deleted. The Section has been further revised for clarity.
2	-	DTSC recommends that the document should be consistent when referring to the soil below the Durable Cover. In some places, the document references "underlying soil" (e.g., see section 3.3, second paragraph, second sentence, which reads: "...such that the underlying soil becomes exposed...) and in other places, the document references "HPS Bay Fill/Native Soil" (e.g., see section 3.3, second paragraph, third sentence, which reads: "...workers will segregate any removed soil Durable Cover material from any removed HPS Bay Fill/Native Soil."	The following references to "underlying soil" have been changed to HPS Bay Fill/Native Soil: • Section 3.3, paragraph 3, first sentence; and • Section 4.1, paragraph 1, last sentence. The references in Section 3.3, paragraph 2 (last sentence) and Section 3.4.2, paragraph 2 (second sentence) were changed to more appropriately reference the Durable Cover on which temporarily disturbed soils may be placed.
3	3.3	Since it may be difficult to distinguish between the Durable Cover and the underlying soil (HPS Bay Fill/Native Soil), DTSC recommends that only 1 ½ feet of the Durable Cover may be temporarily removed, stockpiled, and reused at the Site.	The soil Durable Cover is defined as a minimum of 2 feet of clean imported fill material. Because the final placement of the Durable Cover material is surveyed, any work that removes the soil Durable Cover for any City-permitted project will measure and record the thickness of soil that is removed. In Section 3.3, first paragraph, the soil Durable

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			Cover is defined in the last sentence and language has been added to restate the thickness in the first sentence of the second paragraph.
4	3.4.3	In the second paragraph, second sentence, remove the following phrase: "For project where soil ~~containing NOA~~ will be disturbed in an area of one acre or larger..." It is DTSC's understanding that all native soil throughout the Site may contain NOA and it is not possible to distinguish which areas may not contain NOA.	The recommended change has been made.
5	3.4.4	In the second paragraph, last sentence, add a reference to Title 22 CCR, Division 4.5, Chapter 12 as this chapter includes labeling requirements for transportation.	The recommended change has been made.
6	3.7	In the third sentence add the following text: "All appropriate Navy documents (e.g., Operation and Maintenance Plans) must be consulted..."	The recommended change has been made.

Response to minor DTSC email comments dated 23 May 2018 (from Nina Bacey)			
Item	**Section**	**Comment**	**Response**
1	Acronyms and Abbreviations	• Add BGMP (also define acronym in section 4.4.3), CDPH, SGAL, and SFDBI (also define this acronym in Table 2-1) to the list. • Add an "s" to RG since the definition is plural, i.e., Remediation Goals.	Some of the recommended additions have been made. BGMP is now defined in Section 3.6. CDPH, however, is not used in the main text of the document; so, it was not added. If an acronym was only used once, the acronym was deleted, and the term defined.
2	1.3.1	Make the list of potential state and local regulatory agencies in alphabetical order.	The recommended change has been made.
3	1.4	Should the word "Intended" be included in the first sentence of the second paragraph as follows: "Upon receipt of a proposal to modify the RMP by an Intended User..."?	The recommended change has been made.

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Response to minor DTSC email comments dated 23 May 2018 (from Nina Bacey)			
Item	Section	Comment	Response
4	-	DTSC recommends that the document should be consistent when referring to days. In some places, the document references "calendar" days (e.g., see section 1.4, second paragraph, which reads: "...and issue a decision regarding the proposal within 45 (calendar) days...") and in other places, the document is silent as to whether the days are e.g., calendar v. business. (e.g., see section 1.4, fourth paragraph, second to last sentence, which reads: "...and provide comment on the proposed modifications within 60 days of the submittal by the FFA Signatories.").	To be consistent with the CERCLA process, the time periods for document reviews or approvals were in calendar days. However, for consistency, any references to business days have been changed to calendar days.
5	3.4.2	The word "restreicted" in the first paragraph, third sentence is misspelled and should be changed to "restricted."	This has been corrected.
6	3.6.2	Delete the paragraph break between the third and fourth paragraphs so that the second sentence in the third paragraph is not broken into two separate paragraphs.	This has been corrected.
7	4.2	• The acronym "PSC" should be defined in this section as opposed to section 4.2.2.2. • The acronym "NFA" should be defined in this section as opposed to section 4.2.2.1.	This has been corrected.
8	4.3	The acronym "GMP" should be defined in this section as opposed to section 4.3.2.	This has been corrected.

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Response to USEPA General Comments

Response to USEPA General Comments dated 27 October 2016			
Item	**Section**	**Comment**	**Response**
1	DCP [Appendix G]	The Redline Draft Dust Control Plan, Phase II Development Area, Hunters Point Shipyard, San Francisco, California, 2016 (the DCP) does not include all of the elements in the Final Restricted Activities Work Plan, Hunters Point Artists Parcel Project, Navy Parcels B-1, C, and UC-2, Hunters Point Shipyard, San Francisco, California, April 2016 (the HPAP Work Plan). For example: a. For track-out prevention, the HPAP Work Plan includes a procedure for inspection and cleaning of horizontal surfaces on trucks that can collect soil (e.g. bumpers, fenders, etc.). The DCP does not include this procedure in Section 4.3.1, Track-out Prevention. b. The HPAP Work Plan specifies that any soil or rock to be transported off-site first be analyzed for asbestos content along with other analytes to gain acceptance into an appropriate disposal facility. The DCP only specifies testing for asbestos content but not for other analytes.	While we acknowledge that the two plans are not identical, it should be noted that the DCP within the RMP is not less protective and had been previously approved in March 2015. The intention with this revision was to add information about upcoming parcel transfers; not to rewrite the DCP. Additionally, the DCP in the *Final Restricted Activities Work Plan* (*FRAWP*) is a combined asbestos dust mitigation and fugitive dust control plan prepared specifically for the work at the Artists' parcel. As noted in Section [3.4.3] of the RMP, for projects where surface soil containing NOA will be disturbed in an area of one acre or larger (as defined in the California Air Resources Board Airborne Toxic Control Measures, an Asbestos Dust Mitigation Plan (ADMP) will be submitted to and approved by the BAAQMD, as required. For projects less than one acre in size, or for projects greater than one acre but for which no asbestos data exists, an evaluation will be performed to determine whether an ATCM-compliant ADMP is required prior to initiation of potential dust generating activities. That said, changes made to the DCP-specific portions of the plan in the *FRAWP* were incorporated into the RMP DCP, as applicable, and a general comparison was done to determine

Response to USEPA General Comments dated 27 October 2016			
Item	**Section**	**Comment**	**Response**
		c. The DCP does not appear to include measures to prevent or control dust for inactive surface areas and storage piles, which are included in Section 7.3 of the HPAP Work Plan. d. The DCP includes measures for controlling asbestos dust but not for monitoring, which are specified in Section 8.1 of the HPAP Work Plan. e. The DCP does not specify that water be applied prior to any land clearing. f. The DCP does not include contingency dust control measures, which are included in Section 7.9 of the HPAP Work Plan. g. The DCP does not include procedures for controlling dust in the event blasting activities are required. Please revise the DCP to include the measures above, and any others in the HPAP Work Plan that are not listed above, so that it is at least as protective, or more protective than the HPAP Work Plan. **USEPA Response to General Comment 1c**, dated 5/17/2017: The response partially addresses the comment. The Draft Risk Management Plan Hunters Shipyard Parcels B-1, G, UC-1, and UC-1 and IR Site 7/18 – Lots 1 and 3, Hunters Point Naval Shipyard, San Francisco, California, 2017 (Draft RMP)	if additional dust mitigation measures were necessary to add clarity to the RMP DCP. The following indicate where in the RMP DCP the specified *FRAWP* items identified by USEPA can be found or if a revision to the RMP DCP will be made: a. The second to last sentence in Section 4.3.1 of the DCP will be revised to read *"All vehicle tires and horizontal surfaces on trucks that can collect soil (e.g., bumpers, fenders) will also be inspected and washed …"* b. Section 4.6 of the DCP specifically addresses additional requirements for serpentinite material. Waste characterization of soil for other purposes is already addressed in Section [3.4.4] of the RMP. c. Appendix [G], Section 1.2, paragraph 4 provides reference to the general measures to prevent or control inactive areas, stating *"Mitigation Measure HZ-15 similarly defines best management practices (BMPs) including wetting and seeding unpaved, inactive areas, minimizing activity during periods of high wind, sweeping paved areas, covering trucks, etc."*. Additionally, Section 4.4.1, item 7 addresses inactive disturbed surfaces and stockpiles. Please see response to DTSC comment #7, which addresses the high-wind conditions and additional dust control measures. d. As noted above, asbestos monitoring will not be applicable in all areas. The evaluation process noted in Section [3.4.3] of the RMP will be used to determine if monitoring is needed. e. Section 4.4.1 – Site Preparation and Grading, item 1, specifically addresses wetting activities prior to land clearing.

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Item	**Section**	**Comment**	**Response**
		predicts the potential for high winds. However, details for best management practice to prevent wind erosion or control potential vulnerable exposed soil surfaces/stockpiles under high wind conditions during inactive periods are not included in the Redline Draft Dust Control Plan, Phase II Development Area, Hunters Point Shipyard, San Francisco, California, 2016 (the DCP). High winds could occur less than 5 days after opening a durable cover before application of soil stabilizers. They could also occur on the weekends, holidays, or other periods where work is not occurring. Weather forecasts often indicate when high winds are expected. As discussed during the May 17, 2017, meeting, please add more specific dust control measures when high winds are predicted, the durable cover has been disturbed, and active monitoring is not occurring.	f. The contingency measures included in Section 7.9 of Appendix C *FRAWP* are included throughout Appendix E of the RMP. The contingency measures included in Section 7.9 of *FRAWP* DCP are listed below along with their location in the RMP DCP as a parenthetical. • *Any designated haul roads will be watered more frequently as necessary to control windblown dust and dust generated by construction vehicle traffic when in use by the contractor.* **(Section 4.3.2.3, Item #3)** • *Streets adjacent to the Work Site locations will be swept as necessary to remove accumulated dust and soil. Only wet sweeping methods or a HEPA filter equipped vacuum device will be used. Dry rotary sweeping methods will not be used.* **(Sections 4.3.2.2, Item #4 and 4.3.2.3, Item #2)** • *Water may also be applied to paved roads leading between Work Sites, when necessary.* **(Section 4.3.2.3, Item #2)** • *Vehicle trips will be reduced to the extent practicable.* **(Section 4.3.2.3, Item #6)** • *Construction employees will park personal vehicles on paved surfaces.* **(Section 4.3.2.1, Item #[7])** • *The construction schedule will be prioritized to the extent possible to install permanent cap over potentially asbestos containing soil by placement of concrete road base and curb/gutter.* **(Section 4.6, second paragraph)** • *Imported clean aggregate base rock may be used for placement of the final 6 to12 inches of necessary fill to raise the grade to final subgrade elevation and provide a cover over potentially asbestos containing soil.* **(Section 4.6, second paragraph)** • *Paved public roads will be washed at the end of each work day.* **(Section 4.3.2.2, Item #5)** • *Additional water trucks will be utilized to aid in wetting paved public roads, and Work Site roads as needed, throughout the day.* **(Section 4.3.2.2, Item #6)**

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Response to USEPA General Comments dated 27 October 2016			
Item	**Section**	**Comment**	**Response**
			• *Installation of a misting system can be used up to as much as 24 hours per day as needed to aid in keeping soil moist after construction activity has ceased each day.* **(Section 4.4.4, Item #5)** • *Drop heights will be minimized when dropping soil into an awaiting dump truck.* **(Section 4.4.4, Item #2)** • *Periodic watering of haul routes from the point of excavation to the drop-off point regardless of whether the route is paved, unpaved or within or outside the defined Work Site.* **(Sections 4.3.2.1, Item #1; 4.3.2.2, Item #5 and 4.3.2.3, Items #1-3)** • *A dedicated laborer will be assigned to each point of excavation to sweep, shovel or otherwise push soil inadvertently dropped on adjacent paved roads within the Work Site. If appropriate, an excavator may be used to push soil back into a trench.* **(Section 4.4.4, Item #4)** • *A mechanical sweeper will be utilized at and around points of active excavation and/or backfill occurring on paved streets to prevent soil from collecting on paved surfaces. This measure will be employed to help control track out of sediment onto paved public streets. Only wet sweeping methods or a HEPA filter equipped vacuum device will be used. Dry rotary sweeping methods will not be used.* **(Section 4.3.2.2, Item #4)** g. Blasting activities are not anticipated during the development activities at Hunters Point. There are currently no areas of demolition that have been identified that will require the use of blasting materials. As such, blasting was not identified as a demolition method that would generate fugitive dust. If unexpected blasting activities are needed, guidance from BAAQMD staff will be followed.

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Response to USEPA General Comments dated 25 April 2018 (Judy Huang email)			
Item	Section	Comment	Response
1	-	The RMP assumes that all radiological contamination has been addressed (e.g., in Appendices C and E), however, allegations of falsification by the radiological removal action contractor undermines that assumption. For example, on page C-4, the document states: "The California Department of Public Health (CDPH) issued the Radiological Unrestricted Release Recommendation for Parcel B-1 in July 2012 and reinstated the Radiological Unrestricted Release Recommendation for Parcel B in April 2016 stating that Parcel B is suitable for unrestricted use with respect to radiological issues (CDPH, 2012b and 2016)." It is likely that these references will need to be changed after the completion of the radiological investigation and re-sampling effort.	Comment noted. The RMP will be modified as needed in accordance with Section 1.4.
2	-	Please replace all references to "residential use restriction" with "restriction against residential use".	This term was changed to "Land Use Restriction Area" to match language used in the document.
3	Appendix E	Appendix E, Unexpected Condition Response Plan: Please provide more information on what training workers will receive and what protocols will be followed to identify unexpected conditions, including radiological materials and radiological objects.	Language has been added to the sample EHSP outline (Appendix G) to indicated that consideration should be given to the inclusion of radiological objects, and to RMP Section 3.8. The following language has been added: • Section 3.8, end of second paragraph – *In addition to visual and olfactory cues, examples of radioactive materials, munitions, or other regulated objects that may be encountered during grading activities will be*

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Response to USEPA General Comments dated 25 April 2018 (Judy Huang email)			
Item	Section	Comment	Response
			addressed in the safety training exercises (e.g., underground storage tanks, sumps, pits). • EHSP Outline (Appendix F), item 5.2 Radiological Hazards footnote – *The radiological hazards section should include examples of potential radiological objects to make site workers aware of what may be encountered.* • Appendix E, Section E-1, page E-1, second paragraph – *Training will include the recognition of visual and olfactory cues and radioactive materials, munitions, or other regulated objects that may be encountered during grading activities (e.g., underground storage tanks, sumps, pits).*

Response to USEPA Specific & Minor Comments

Response to USEPA Specific Comments dated 27 October 2016			
Item	Section	Comment	Response
1	Figure 1-1; Section 2.3.1 and Figure 2-1 (Now Appendix C, 1.1)	Figures 1-1 and 2-1 do not include the Installation Restoration Site 10 (IR-10; Building 123) "carve-out," which is being deferred for transfer with Parcel B-2. In addition, removal of this area from Parcel B-1 would also decrease the overall acreage of Parcel B-1 provided in Section [C-1.1]~~2.3.1~~. Please add the IR-10 carve-out area to Figures 1-1 and [C]-1. Please also update the Parcel B-1 acreage in Section [C-1.1]~~2.3.1~~.	The IR-10 carve-out has been added to the figures as appropriate and the acreage for the portion of Parcel B-1 that is included in this RMP has been revised. This Revision 1 to the RMP was prepared prior to the designation of the carve-out area.
2	2.3.1, second paragraph (Now Appendix C, 1.1)	The last sentence indicates that the only metal that is a chemical of concern (COC) in groundwater is Chromium VI (hexavalent chromium), which contradicts the Draft Finding	Please see the response to DTSC comment 4. As noted, it was determined that chromium VI is no longer a COC in groundwater at Parcel B-1 during the development of the RD (ChaduxTt, 2011 and 2012).

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Response to USEPA Specific Comments dated 27 October 2016			
Item	**Section**	**Comment**	**Response**
		of Suitability to Transfer for Parcel B-1, Hunters Point Naval Shipyard, March 2015 (the Parcel B-1 FOST). The Parcel B-1 FOST indicates, "Metals of concern in groundwater include copper, hexavalent chromium, lead, and mercury." Please revise the RMP as needed to resolve this discrepancy. **Response to Specific Comment 2**, dated 5/17/2017: The response partially addresses the comment. While Chromium IV is no longer a contaminant of concern (COC), the text does not explain why copper, lead, and mercury are not listed as COCs in Parcel B-1 in the Draft RMP when they were listed as COCs in the Draft Finding of Suitability to Transfer for Parcel B-1, Hunters Point Naval Shipyard, March 2015 (the Parcel B-1 FOST). Please revise the RMP text to include copper, lead, and mercury as COCs or to explain why they are no longer considered COCs.	Mercury is listed in the Parcel B ROD (Navy, 2009d) as a COC and has an established remedial goal (RG). Copper, lead and chromium VI are included in a remedial action objective in the Amended Parcel B ROD (ChaduxTt, 2009) with trigger levels to protect beneficial uses of the bay, including ecological receptors for areas of Parcel B-1 close to the shoreline. RGs were not established for these compounds in the ROD. However, trigger levels were established in the Amended ROD and are used for comparison during monitoring events. Results from the Navy's ~~b~~Basewide groundwater monitoring program show that there are no recent exceedances of trigger levels (CE2-Kleinfelder, 2016). Language in Appendix C Section 1.1 has been revised to clarify the compounds with ecological receptor limits.
3	2.3.1.1, first paragraph (Now Appendix C, 1.1.1)	The text indicates that the Final Remedial Action Completion Report (RACR) for Parcel B-1 was completed in 2015; however, the Final RACR is pending. In addition, the reference in this paragraph is to a 2015 document, but the references list this as a 2016 "(pending)" document. Please revise the text to indicate the pending status of this document or insert a placeholder until the RACR is finalized. Please also insert placeholders for the year of completion in both the text and references list.	The text and associated references have been revised to include placeholders for final dates.

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Response to USEPA Specific Comments dated 27 October 2016			
Item	**Section**	**Comment**	**Response**
4	2.3.1.2, second paragraph (Now in Appendix C, Section 1.1.2)	The text incorrectly states that the remedial action (RA) at Parcel B-1 was completed in 2012. Soil, soil vapor, and groundwater remediation are ongoing at IR-10. Although this portion of IR-10 is a carve-out from Parcel B-1 slated for future transfer, it should be discussed in this section. Please revise this section to include a discussion of the ongoing remediation at IR-10 and revise the statement that RA is complete in Parcel B-1.	The text will be revised as follows: *With the exception of the IR-10 carveout area, the remedial action (RA) at Parcel B-1 was completed in 2012. Soil, soil vapor and groundwater remediation activities are ongoing in the IR-10 carveout area. The FOST documents the CERCLA remedy that is in place in Parcel B-1 (Navy, pending).*
5	2.3.1.3.1 and 2.3.3.3.1 (Now in Appendix C, Sections 1.1.3.1 and 1.3.3.1)	Please note that when EPA reviews individual Restricted Activity Workplans, these workplans are expected to specify field testing approaches for location-specific health and safety protocols referred to in Section [4.1], which apply during removal of building foundations and excavation of soil beneath the foundations. For example, Section [4.1], Location-Specific Health and Safety Protocol, states that field screening instruments will be employed if the soil is unnaturally discolored and/or exhibits a chemical odor. Visual and olfactory indications, while useful, will not indicate the potential presence of all COCs, notably metals and polychlorinated biphenyls (PCBs). Field screening methods and precautions should be implemented based on the COCs that were detected around the building before any RAs occurred. In addition, in the beginning stages of foundation removal, it would be difficult to see staining and detect chemicals by smell until	Comment noted.

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Response to USEPA Specific Comments dated 27 October 2016			
Item	**Section**	**Comment**	**Response**
		after enough foundation was removed to expose soil, at which point, contaminated dust may have already been dispersed.	
6	2.3.1.3.1 (Now in Appendix C, Section 1.1.3.1)	In the three bullet points in this section, metals in general should be added to the list of COC classes that should be considered during foundation and soil removal. The reason for inclusion of metals is that the first bullet point in Section [C-1.1.2]~~2.3.1.2~~, CERCLA Remedy, states that durable covers are to remain over the entire parcel to prevent contact with residual ubiquitous metals in soil. Please add metals to the list of COCs in each of the three bullet points in Section [C-1.1.3]~~2.3.1.3~~.	Appendix C, Section 1.1.3.1 identifies construction worker health and safety protocols which apply only to those locations where the building foundation may be removed for development activities in the future where chemicals may be present at "unexpected levels" based on historical building uses and suspected release sources as discussed in RMP section [4.1] Building Foundation Removal – Construction Worker Health and Safety. The chemicals identified in Appendix C Section 1.1.3.1 as potentially having unexpected levels are based on discussions with USEPA during development of the RMP and subsequent summary information provided in an email from Lily Lee, dated 7/24/2015. Additional location-specific construction worker health and safety protocols are not required for ubiquitous metals at Building 113/113A, 123, or 146. See EPA comment to Response to specific comment 6, dated April 25, 2018, for clarification. ~~No revisions to the text were made as a result of this comment.~~
7	2.3.1.3.4 and 2.3.2.3.4 (Now in Appendix C, Sections 1.1.3 and 1.2.3)	The description in the text should be revised to more accurately describe site conditions. The text indicates that on Parcel B-1 and on Lots 1 and 3 of Installation Restoration Sites 7 and 18 (IR-7/18), there are no known areas with COCs in soil above remedial goals (RGs) or petroleum strategy criteria (PSC) subject to special handling and management protocols. However, these sections should also include a	These sections address specific areas subject to special protocols. The general environmental condition of each Parcel is discussed earlier in the respective section. In addition, as stated at the outset of Appendix C, notwithstanding the known conditions, the potential exists for unexpected conditions to be encountered throughout the Site, which is addressed in RMP Section 3.8 (along with other general protocols).

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Response to USEPA Specific Comments dated 27 October 2016			
Item	**Section**	**Comment**	**Response**
		statement about the potential presence of areas with COCs above RGs or PSC that have yet to be discovered. The rationale for this request is related to the fact that based on sample spacing, sampling during the characterization and remediation stages may not have detected all areas with COCs above RGs or PSC and thus there is some uncertainty remaining. This statement should include a reference to sections that address how to manage these areas. In addition, the text for Parcel B-1 should acknowledge the presence of volatile organic compound (VOCs) above RGs in soil beneath Building 123. Please revise Section [C-1.1.3]~~2.3.1.3.4~~ to include a statement about the potential presence of undiscovered areas with COCs above RGs or PSC and a reference for how to manage these areas.	Note also that the areas beneath Building 123 where soil concentrations above RGs may currently remain, and where remediation continues, are within the footprint of the IR-10 carveout, which is not part of this RMP. No revisions to the text were made as a result of this comment.
8	2.3.1.3.7 (Now in Appendix C, Section 1.1.3.4)	Although the remedy may permit residential use, the text in this section should be revised to clarify that there are no prohibitions (as opposed to restrictions) associated with residences being constructed on Parcel B-1 as long as measures in the Parcel B-1 FOST are implemented. For example, construction of enclosed structures such as a residence over a VOC area requiring institutional controls (ARIC) can only occur if engineering controls or other design alternatives are implemented to reduce potential risk from VOCs in indoor air resulting from vapor intrusion. In addition, there are	The use of institutional and/or engineering controls over VOC ARICs is noted in Appendix C, Section 1.1.3.4, which references Section [4.4] of the RMP that addresses construction practices. No revisions to the text were made as a result of this comment.

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Response to USEPA Specific Comments dated 27 October 2016			
Item	**Section**	**Comment**	**Response**
		other restrictions related to activities typically conducted at residences, such as digging, landscaping, and gardening using native soil. Please revise this section to incorporate language that clarifies that there are restrictions on residential use.	
9	2.3.2.3.1 (Now in Appendix C, Section 1.2.3)	This section should state that the durable cover areas are subject to special protocols to protect construction workers during any future removal of the durable cover or underlying soil because Section [C-1.2.2]~~2.3.2.2~~, CERCLA Remedy for Lots 1 and 3, specifies a durable cover as a physical barrier to cut off exposure to ubiquitous metals in soil. Please revise this section to discuss the protocols to protect construction workers from metals and other contaminants in soil when durable covers are removed. Please also update Table [C]-1 (Areas Subject to Special Protocols).	This section addresses special protocols that apply only to certain identified locations at the Shipyard, none of which are located in IR-7/18, as stated in the RMP. Durable covers have been specified throughout the site to address the potential exposure to ubiquitous metals. General health and safety protocols, applicable throughout the site, will be followed when disturbing durable covers in general (Section [3.1]). When addressing specific buildings requiring more robust health and safety protocol, which are located as specified in parcels other than IR 7/18, the requirements outlined in Sections [4.1] and [3.8] will be followed. No revisions to the text are proposed based on this comment.
10	2.3.2.3.7 (Now in Appendix C, Section 1.2)	The "Lot 2" designation did not come to pass until after the ROD was written. We suggest that there be an additional sentence or footnote that makes clear that lot 2 is restricted or a note pointing out when the area was divided into the three lots so that the post-ROD history is clear.	Because Lot 2 is not part of this RMP, aside from the introductory Section C-1.2, information about Lot 2 was purposely omitted. The figures clearly depict the applicability of the RMP. Section C-1.2, paragraph 2, sentence 1 will be revised as follows: *Subsequent to preparation of the ROD, IR-7/18 was delineated into three lots to aid in the transfer of the lots that do not have restrictions for ROCs~~non-restricted portions of IR-7/18~~.*
11	2.3.3.3.4	The text in this section appears to contradict the text in Section [C-1.3.1]~~2.3.3.1~~,	Please see response to DTSC comments 2 and 5.

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Response to USEPA Specific Comments dated 27 October 2016			
Item	**Section**	**Comment**	**Response**
	(Now in Appendix C)	Environmental Conditions and Section [C-1.3.3.3]~~2.3.3.3.7~~, Areas with Residential Use Restrictions. Section [C-1.3.1]~~2.3.3.1~~ states that COCs that remain in soil above the RGs and action levels (ALs) include metals, including arsenic, chromium VI, cobalt, lead, and manganese, and the polycyclic aromatic hydrocarbons (PAHs) benzo(a)anthracene, benzo(a)pyrene, and benzo(b)fluoranthene. Section [C-1.3.3.3]~~2.3.3.3.7~~ states that the areas where these COCs are located are subject to special soil handling and management protocols. Section 2.3.3.3.4 indicates there are no known areas with COCs in soil above RGs or PSC subject to special soil handling and management protocols. Please revise the RMP to address this discrepancy. Please also update Table [C]-1 (Areas Subject to Special Protocols).	Appendix C, Section 1.3.3 addresses special protocols that apply only to certain identified locations at the Shipyard. There are no known areas with COCs in soil above RGs or PSC subject to special protocols in Parcel G, as stated in the RMP. To avoid confusion, however, this ~~S~~section has been deleted.
12	2.3.3.3.5 (Now in Appendix C, 1.3.3.2.1)	This section should include a statement about the potential existence of pipes coated with a PAH material underground at Parcel G and how to handle this material if encountered, similar to the statement made for Parcel B-1 in Section [C-1.1.3.2.1]~~2.3.1.3.5~~. This statement is included in the redline Final Finding of Suitability to Transfer for Parcel G, Hunters Point Naval Shipyard, San Francisco, California, October 2014 (the Parcel G FOST), which is still a pending document. Please revise section [C-1.3.3.2.1]~~2.3.3.3.5~~ to include a statement about	The following will be added as paragraph 2 in Section C-1.3.3.2.1: *Pipes coated with a material containing PAHs may be present below ground surface at various locations at the Property. PAHs are regulated substances and must be handled in accordance with all applicable federal, state, and local laws and regulations. The Navy, in consultation with EPA, DTSC, and the Water Board, has determined that the pipes and associated coating material in their existing subsurface condition do not present any threat to human health or the environment, and will not present any threat to human health or the environment if and when removed and*

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Response to USEPA Specific Comments dated 27 October 2016			
Item	**Section**	**Comment**	**Response**
		the potential existence of pipes coated with a PAH material underground at Parcel G.	*handled in accordance with applicable laws. (Navy, Final Parcel G FOST, pending).*
13	Figure 2-1 (Now C-1 in Appendix C)	It is confusing to have the total petroleum hydrocarbons (TPH) no further action (NFA) Site 10-B overlying the area where soil vapor extraction (SVE) is ongoing and where there is a VOC ARICs restriction. There is an apparent contradiction because the figure depicts this area as NFA, but this area is subject to land use controls and there is ongoing remediation. This apparent contradiction would be resolved if TPH areas were presented on a separate figure. Please remove TPH sites from Figure [C]-1 and provide a separate figure with the status of the TPH sites.	Figure C-1 has been modified to remove any TPH site designations within the IR-10 carve-out area as IR-10 will not transfer with Parcel B-1 and is not part of this RMP.
14	Appendix [G], Section 5.2.2, page G-23	The directions that the prevailing winds blow from (west or west-northwest) and toward (east or southeast) were changed, but these changes are not consistent with the directions provided in Section 8.2.1 of the HPAP Work Plan. The prevailing wind direction is important because air monitoring locations are established based on this information. Please clarify why the changes are not consistent with the HPAP Work Plan and provide a reference for the source of the prevailing wind direction.	The prevailing wind direction are based on data collected from an onsite meteorological station in 2015, and they are consistent with prevailing direction provided in the March 2015 RMP (Revision 0, Figure 2). However, the predominant direction was previously misstated in both the RMP and HPAP Work Plan (from the southwest). Although wind does also blow from the southwest at times, it is not from this direction most the time. The prevailing wind direction is predominantly from west or west-northwest.
Response to USEPA Minor Comments dated 27 October 2016			
1	2.3.2, first paragraph (Now in Appendix C)	The text refers to Figure [C]-1 (Parcel B-1 Environmental Conditions) for IR-7/18 features but the correct figure reference appears to be Figure [C]-2 (Lots 1 and 3, IR 7/18	This reference has been corrected.

Response to USEPA Specific Comments dated 27 October 2016			
Item	**Section**	**Comment**	**Response**
		Environmental Conditions). Please revise this section with the correct figure reference.	
2	2.3.3.3.1 (Now in Appendix C)	This section indicates Building 366 is shown on Figure [C]-3; however, this building is not shown on this figure. Note that there are two Building 436's on this figure. Please label Building 366 on Figure 2-3.	This reference has been corrected.

Response to USEPA Specific Comments dated 25 April 2018 (Judy Huang email)			
Item	**Section**	**Comment**	**Response**
-	Response to Specific Comment 6	The response does not address the comment; specifically, metals should be added to all of the bullet points (building locations, Buildings 113, 113A, 123, and 146) as constituents of concern (COCs) in Section C-1.1.3.1 of Appendix C. Metals are COCs because as stated by Section C-1.1.2, CERCLA Remedy, of Appendix C, one of the purposes of the Durable Cover is to "prevent contact with residual ubiquitous metals in soil." Because soil beneath the buildings was not fully characterized, metals should be included in the COC list as a protective precaution. In addition, metals in soil are also specifically identified as COCs for Buildings 113, 113A, 123, and 146 in Table 5-1 of the 2009 Amended Record of Decision for Parcel B. Please revise Section C-1.1.3.1 to include metals as COCs beneath the buildings described in this section.	To clarify this, Section C-1.1.3.1 has been revised as follows: *The general health and safety protocols outlined in RMP Section 3.1 are in place to protect workers from potential impacts to human health, such as those from ubiquitous metals. However, location-specific protocols are required when the Owner is removing building foundations or portions of building foundations in specific locations that expose the HPS Bay Fill/Native Soil.* The FFA Signatories ... previously remediated in soil surrounding the buildings, *but not under buildings.* Specific chemicals of potential concern *may* include metals, PCBs, PAHs, SVOCs, and/or VOCs.

Response to USEPA Specific Comments dated 25 April 2018 (Judy Huang email)			
Item	Section	Comment	Response
1	3.6, Groundwater Monitoring Wells, third paragraph, page 3-9	While the revised language states that "every effort" will be made in order not to damage any monitoring wells encountered during field activities, there appear to be no measures in place to evaluate whether a well has been damaged by field activities. For example, wells should be inspected to evaluate whether there was damage during and after field activities. Please revise Section 3.6 to require inspection of wells to insure none are damaged during field activities.	The following sentences have been added at the end of the paragraph: *At the conclusion of work, all monitoring wells within the work area will be inspected to confirm that no damage has occurred. The final condition of the wells will be documented in the completion report(s), as applicable.*
2	4.2.1, Soil with COCs Above RGs or PSC, page 4/14	The last bullet item on Page 4-14 states that "imported material that meets the requirements of the approved SIP (see Section 3.7)" will be used as backfill; however, Section 3.7 does not discuss the soil import plan (SIP). Section 3.3 and Section 3.4.5 mention the SIP. Please resolve this discrepancy.	This has been corrected to reference Section 3.4.5.

Response to Water Board Email Comments

Response to Water Board email comments dated 28 October 2016			
Item	**Section**	**Comment**	**Response**
1	General	Parcel-specific "Areas with Residential Use Restrictions": It seems this term and section was inserted for the situation at Parcel G, but it is confusing because other parcels are also restricted from residential use (as well as daycare, school for persons under 21, and hospitals) in some areas. Under the parcel-specific sections for IR 7/18 and UC-1, it is stated that "There are no areas with residential use restrictions ..." This is not accurate, as both of these parcels have areas that were not cleaned up to residential standards and thus are restricted from residential use unless approved by the FFA signatory agencies. Please check and verify the residential use restrictions for all Parcels covered by the RMP, and correct the text as needed.	We have checked and verified the areas with residential use restrictions (i.e., those areas restricted to open space and recreational uses) for all Parcels covered by the RMP. Parcel-specific "Areas with Residential Use Restrictions" apply as follows: - Parcel B-1: Not Applicable (see Land Use Control Remedial Design Parcel B [Excluding Installation Restoration Sites 7 and 18] dated 5 July 2011) - Parcel G: Applicable (see Explanation of Significant Differences to the Final Record of Decision for Parcel G pending finalization) - Parcel UC-1: Not Applicable (see Finding of Suitability to Transfer for Parcels UC-1 and UC-2 dated 25 March 2015) - Parcel UC-2: Not Applicable (see Finding of Suitability to Transfer for Parcels UC-1 and UC-2 dated 25 March 2015) - IR Sites 7/18 - Lots 1 and 3: Not Applicable (i.e. Lot 2, which is not part of the RMP, is subject to residential use restrictions). Note that ARICs for VOCs are separate from ARICs for residential use.

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Item	**Section**	**Comment**	**Response**
			Note also that, as discussed in response to DTSC comment 5, we are deleting these specific sections (i.e. section identifying protocols within a parcel that are not applicable).
2	2.1.6	Please delete the last sentence: ~~There are no known petroleum NFA areas with Restriction on the Parcels that currently comprise the Site~~. The sentence is not necessary, and will not be accurate when Parcel C transfers. There are petroleum sites in Parcel C that that were issued an NFA with restrictions.	This section has been removed from the RMP. As such, the sentence is no longer included in the document.
3	2.3.1 (Now in Appendix C, Section 1.1)	The section describing Parcel B-1 and its environmental conditions needs to be updated to take into account the anticipated cut-out of IR Site 10.	The acreage has been updated to remove the IR site 10 area and the following footnote has been added: *The area included for Parcel B-1 does not include the 2.6 acres that encompass IR-10 because remediation is ongoing and IR-10 will not be transferred with the remainder of the parcel.*
4	2.3.3.3.5 (Now in Appendix C, Section 1.3.3.2.1)	Please revise the first sentence as follows: RWQCB staff issued NFA letters closing the Parcel G petroleum corrective action areas in 2011, determining that residual contamination left in place is below PSCs and pose no significant risk to human health or the environment. There were PAHs left in place above screening levels.	In coordination with RWQCB, the Navy drafted a paragraph about tar paper wrapped pipes to be included in each FOST in the section titled Petroleum Products and Derivatives. EPA comment 12 also requested that this be added to this section and we agree. With the exception of Lots 1 and 3 at IR7/18 (where this paragraph isn't included), we will add this paragraph to summary section of every parcel under this Petroleum NFA Areas with No Restrictions heading: "Pipes coated with a material containing PAHs may be present below ground surface at various locations at the Property. PAHs are regulated substances and must be handled in accordance with all applicable federal, state, and local laws and regulations. The Navy, in consultation with EPA, DTSC, and the Water Board, has determined that the pipes and associated coating material in their existing subsurface

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			condition do not present any threat to human health or the environment, and will not present any threat to human health or the environment if and when removed and handled in accordance with applicable laws."
5	3.3 (Now 1.4)	The second paragraph of this section states that the FFA signatories will issue a decision regarding proposed changes to the RMP within 45 calendar days. Please delete the 45-day timeline for FFA signatory decision-making.	The 45-day timeframe was included as a guideline to help the overall progress of the RMP process in general. This timeframe was previously approved during initial discussions to finalize version 0 of the RMP. Please also see response to DTSC comment 9. Regarding substantive changes to RMP requirements, please see response to DTSC comment 7.
6	4.2 (Now 2.2.2)	The second paragraph of this section states that the FFA signatories shall review and approve or provide comments within 45 calendar days of receipt of the Restricted Activities Work Plan. Please delete the 45-day timeline for FFA signatory action. FFA Signatories will respond in a timely manner, however the review time will depend on the nature of the work plan, quality of the work plan, and workload commitments.	Please see response to DTSC comment 9. Regarding substantive changes to RMP requirements, please see response to DTSC comment 7.
7	5.1.2 (Now 4.1)	In the second paragraph of this section, please revise the sentence stating that the environmental professional may screen the soil using one or more field screening instruments as appropriate, to state that the environmental professional shall screen the soil using field screening instruments. In addition, field screening instruments should be employed even if the soil is not discolored or exhibits a chemical odor. Several of the COCs identified in the Areas Requiring Location-Specific Construction Worker Health and Safety Protocol	The information on field screening is not different from that which was approved in March 2015 with version 0 of the RMP. The screening of soils for general health and safety, which typically includes the screening of soils with a PID, will be included in applicable health and safety plans prepared by contractors for development. Field screening with instrumentation other than a PID may be conducted based on the location of soil disturbance. However, because not all instrumentation will be used in all monitoring scenarios, 'may' is used to allow for the selection(s) to be made in the

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Item	**Section**	**Comment**	**Response**
		sections would not exhibit discoloration or odor. Relying on discoloration or odor could miss detecting and adequately monitoring these COCs.	field. Unexpected conditions will be addressed as discussed in Section [3.8]. Regarding substantive changes to RMP requirements, please see response to DTSC comment 7. No revisions to the text were made based on this comment.
8	5.4.3 (Now 4.2.1)	The first bullet states that soil containing COCs above RGs may be uncovered for up to five years. Please consider a shorter time frame, such as 3 years. The cover is part of the remedy, and provides a measure of protection. Replacing the cover in a shorter time frame would be more protective, and reduce the potential for residents or workers to be exposed to dust containing COCs above RGs.	Please see response to DTSC comment 7.
9	5.4 (Now 3.4.1)	This section states that, with certain exceptions, soil may be moved within the Site with prior FFA signatory approval. This soil handling approach may not be appropriate, given that different portions of the Site were remediated to varying RGs and Action Levels. Depending on the parcel and the future use, FFA Signatories approved different concentrations of COCs to remain beneath the cover. Soil from one area should only be moved to another area if the RGs or Action Levels are comparable. **Water Board Response to Comment #9 – email from Tina Low, dated 23 May 2018:** The response to my comment number 9 does not address my concern. At issue is whether it is allowable to	We acknowledge this comment and your email response dated 11/17/16 that states "The Water Board will allow soil to be moved among areas with the same land use. Soil from a more sensitive use area may also be moved to a less sensitive area (i.e., moving soil from a residential reuse area to a commercial reuse area is allowable). Soil may not be moved from a less sensitive land use area to a more sensitive land use area (i.e., moving soil from a commercial area to a residential area is not allowable). In the event there are any changes in the planned reuse, the FFA agencies must be notified and the soil management protocols may be re-evaluated." Please also see DTSC comment 12b and response. ~~No revisions to the text were made based on this comment.~~As discussed during the 24 May 2018 FFA Signatory meeting, the language in Section 3.4.1, paragraph 2 has

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Item	**Section**	**Comment**	**Response**
		move soil located in an ARIC for VOCs in Soil Vapor (VOC ARIC) to another location. The Water Board maintains that is not allowable because it is not a movement of material from "like" to "like" and therefore would not be protective. An area is designated a VOC ARIC due to high soil gas concentrations. Moving soil (including saturated soil) from a VOC ARIC location (where it has the protectiveness of the Institutional Control) to another location that does not have the protectiveness provided by the Institutional Control could contaminate the receiving site and create a new exposure to VOCs. In other words, the moved material may cause high soil gas concentrations at its new location, which would not be protected by an Institutional Control (VOC ARIC). There would be no measures in place to cut off the vapor intrusion pathway. The response states that VOC sources will have been remediated by the Navy and that residual VOCs in the soil gas are expected to attenuate with time. While this may be the case, the length of time for the residual VOCs to attenuate is unknown and the receiving site will not have the benefit of Institutional Controls to cut off the vapor intrusion pathway. The response also states that the soil handling process will disperse VOCs in soil gas before it gets to its new location. This assertion would need to be confirmed by testing.	been modified as follows: This authorization to relocate soil within the Site does not apply to HPS Bay Fill/Native Soil excavated in Land Use Restriction Areas ***or in VOC ARICs***, which are described as applicable for each Parcel in Appendix C. As further discussed in Section 4.2.3, soil excavated from Land Use Restriction Areas ***and VOC ARICs*** may not be moved to a location within the Site outside of a Land Use Restriction Area ***or a VOC ARIC*** without prior FFA signatory approval.

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		Movement of soil from a VOC ARIC to another VOC ARIC would be acceptable, provided that the land use criteria are met (i.e., soil can be moved among areas with the same land use, and soil from a more sensitive use may be moved to a less sensitive area).	
10		Email correspondence from Tina Low on 17 and 21 November 2016: Soil located in an ARIC for VOCs in Soil Vapor may not be moved to another location. The concern with moving soil from an ARIC for VOCs in [s]oil [v]apor is that the source of the soil vapor may be in the soil or soil gas, and that moving this material could contamina[te] the receiving site. One example is IR-10, where the suspected source of TCE is soil. Soil from IR-10 should not be re-located to another site unless it is demonstrated to be clean. I realize IR-10 has been cut out and is not part of this transfer, but a similar situation may exist elsewhere. I did not find language in the RMP that clearly prohibits movement of soil under these circumstances. [Please include language to address this soil movement scenario.]	The topic of defining restrictions and protocol for soil movement around HPS beneath the durable cover after transfer was one of the primary reasons the RMP was written. Specifically, soil containing ubiquitous metals or residual low level of other COCs could be moved anywhere around the Site so long as the soil remained under the Durable Cover at its new home. The premise for this is understood as follows: i) all remediation necessary to protect human health and the environment had been taken by the Navy and the property is safe for transfer; ii) all identified hazardous substance **source** areas have been investigated and remediated by the Navy to the satisfaction of the FFA Signatories; iii) institutional and engineering controls are a component of the remedy and were put in place to manage potential risk from residual (not source) concentrations of ubiquitous metals, PAH, and petroleum hydrocarbons in soil, and VOCs in soil gas. With respect to VOCs in soil gas, we understand that the Water Board is concerned that movement of soil containing VOCs could potentially create a VOC vapor intrusion concern at the new location. However, we do not believe there is a technical basis for this concern, based on our understanding of site conditions of the transferred and to-be-transferred Parcels, as documented in the Administrative Record. Our position regarding this issue is summarized as follows:

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			The Navy implemented the soil vapor investigation and documented its findings in the Technical Memorandum, Soil Vapor Investigation in Support of a Vapor Intrusion Assessment for Parcels B, D-1, G, and UC-2. The Technical Memorandum documented that VOCs were present in the subsurface soil gas as the result of sources in soil and groundwater. The Navy further stated in the Technical Memorandum, "*All contaminated soil and groundwater in Parcels [B], D-1, G, and UC-2 are required to be remediated to achieve RGs established in the relevant CERCLA RODs*." At all known release (source) areas to date on Parcels that have already transferred, the Navy has remediated the groundwater and/or soil source as required in the respective ROD and to the satisfaction of the FFA Signatories, as documented in the Remedial Action Completion Reports and the Finding of Suitability to Transfer reports. For Parcels yet to be transferred, it is our understanding and expectation that, all soil and groundwater **source** areas will have been remediated as required and approved prior to transfer. The conclusion that we draw from the Technical Memorandum, RACR and FOST documents is that the VOCs in soil gas are residual artifacts of the past source conditions, which have since been remediated (or will be remediated prior to transfer). With the soil and/or groundwater source areas removed, the residual VOCs in the soil gas are expected to attenuate with time as they move through the vadose zone into the atmosphere and/or degrade in place. Based on the above, it is our understanding that the process of moving soil from a VOC ARIC to a non-VOC ARIC location will not result in a potential VI concern at the new location

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			for the following reasons. First, the original soil source will have been remediated by the Navy and there will be no VOC soil source transferred to the new location. Second, the soil will have been removed away from its associated former groundwater source. Therefore, an ongoing soil or groundwater VOC source will not be present at the new location. Third, we would not expect any VOCs that exist within soil to remain with the soil in conditions that could present a vapor intrusion risk throughout the process of excavation, transport, and relocation. We would expect a rapid dispersion of the VOC vapors from the pore spaces in the soil to the atmosphere during soil management. By the time the soil gets to its new location, VOCs in soil gas will have been mostly or completely dispersed and the potential for continued migration or intrusion into future buildings at concentrations of concern will not exist. Additionally, we conducted an extensive soil data review for VOC contaminants remaining in soils within VOC ARICs to search for potential correlation to the designation of a VOC ARIC. Our data review consisted of comparing the VOC detections in the soil samples collected by the Navy during the soil vapor assessment Technical Memorandum work (within Parcels B, D-1, G and UC-2), and comparing them to the soil RGs defined in the respective Parcel ROD, or to the Parcel B RGs for those with no specified RGs. Of all the soil samples collected by the Navy during the Technical Memorandum work, only 9 samples (8 in Parcel B and 1 in Parcel G) had detections of VOCs in soil slightly above the RGs. In addition, 7 of those 8 Parcel B samples were located in IR-10 where remediation to treat

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			groundwater and soil vapor is ongoing. Until the IR-10 remedy is operating properly and successfully, the IR-10 area will not transfer and will not be part of this RMP. The majority of Navy soil sample results within VOC ARICs, where soil vapor concentrations were at levels high enough to warrant a VOC ARIC designation, had no VOCs detected or the results were estimated to be below the laboratory reporting limit. For these reasons, we see no technical basis for the Water Board's concerns. Regarding substantive changes to RMP requirements in general, please see response to DTSC comment 7. ~~No revisions to the text were made based on this comment.~~

Response to Water Board email comments dated 9 March 2018 (from David Tanouye)			
Item	**Section**	**Comment**	**Response**
1	4.2.2, Soil with Residual Petroleum	Please reinsert the following deleted sentences: "In certain areas, the NFA designation is subject to restrictions. Soil management protocol is described below for NFA areas that are not subject to restrictions and for those subject to restrictions."	This language has been reinserted.
2	-	Please be consistent on the use of soil vapor v. soil gas throughout the document.	For consistency, the few uses of 'soil gas' were changed to 'soil vapor'. The term "soil gas" is included in document titles (e.g., DTSC's advisory) and the Navy's SGAL acronym.

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