RESPONSES TO REGULATORY AGENCY COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015

The table below contains the responses to comments received from the regulatory agencies on the "Draft Finding of Suitability to Transfer for Parcel B-1, Hunters Point Naval Shipyard, San Francisco, California," dated March 2015. The comments addressed below were received from the U.S. Environmental Protection Agency (EPA), the California Department of Toxic Substances Control (DTSC), the San Francisco Bay Regional Water Quality Control Board (Water Board), and the City and County of San Francisco Department of Public Health (city). Throughout this table, *italicized* text represents additions to the document and ~~strikeout~~ text indicates deletions. Also throughout this table, references to page, section, table, and figure numbers pertain to the new document unless otherwise indicated.

Comment Number	Section/ Page	Comment	Response to Comment
Responses to Comments from U.S. Environmental Protection Agency (Lily Lee, dated April 22, 2015)			
General Comments			
1.	---	At IR-10, USEPA's comments on the February, 2015, draft Remedial Action Completion Report for Parcel B-1 asked questions about whether soil vapor extraction (SVE) has reached asymptotic conditions, potential sources not yet characterized under Building 123, and other concerns related to trichloroethylene in soil gas. Further discussion is ongoing regarding these questions, so USEPA may make future comments regarding this issue based on these discussions.	Comment noted. The finding of suitability to transfer (FOST) has been revised to incorporate the carve-out area in Installation Restoration (IR) Site 10.
2.	---	As a reminder, USEPA's concurrence letter on the final FOST for Parcel B-1 will include the usual reservations regarding post-transfer discoveries of hazardous substances, including lead-based paint and pesticides.	The Navy notes and understands EPA's comment.
3.	---	The text makes reference at various points to forthcoming work (e.g. scanning) and documents anticipated. Please note that USEPA may have additional comments after review of those in the future.	Comment noted.

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/ Page	Comment	Response to Comment
Specific Comments			
1.	Section 3.1, Comprehensive Environmental Response, Compensation, and Liability Act, Pages 2 and 3	The reader would get a clearer picture of the site history if the text could explain specifically why remediation was placed on hold in 2001 and the 1997 ROD had to be amended. For example, it could explain that further delineation of the groundwater plume revealed that concentrations in groundwater were found to be higher and the groundwater plume was more extensive, potential vapor intrusion issues, etc. It could also explain how the revetment is protecting ecological receptors in the bay from what forms of contamination.	Detailed information on the history of the decisions made for Parcel B is included in the amended record of decision (ROD) (Navy 2009). The text was not revised as a result of this comment.
2.	Section 3.1, Comprehensive Environmental Response, Compensation, and Liability Act, Page 3	The last paragraph of this section appears to indicate that the human health risk assessment (HHRA) for Parcel B-1 was completed in 2007, but the original HHRA was completed for the 1996 Parcel B Remedial Investigation Report. The 2007 HHRA should be described as a revised or updated HHRA.	The text has been revised as follows. "All of the Property was included in *an updated* human health risk assessment…"
3.	Section 3.1.2, Remedial and Removal Actions after the 1997 ROD, 4th bullet	Please provide more details regarding the Navy's actions.	The text has been expanded as follows. "*Activities at the Property included surveys of industrial process equipment for PCB content and abatement of ACM* (Tetra Tech Foster Wheeler Inc. 2004)." Additional, specific details are available in the cited report.

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/ Page	Comment	Response to Comment
4.	Section 3.1.3, Remedial and Removal Actions after the 2009 Amended ROD, Page 5 and Section 3.3.2, USTs, Page 8	The information in Sections 3.1.3 and 3.3.2 about the underground storage tank (UST) discovered at Building 113A is inconsistent. Section 3.1.3 states that "the tank was suspected to contain gasoline." Section 3.3.2 states that the UST "contained petroleum and solvents." Please revise the text to present consistent information about UST 113A.	The text in Section 3.1.3 has been revised as follows. "…the tank was suspected to contain *petroleum and solvents* ~~gasoline~~."
5.	Section 3.1.3, Remedial and Removal Actions after the 2009 Amended ROD, Page 6, O&M Plan	The text states "Long-term monitoring and maintenance requirements for the durable covers at Parcels B-1 and B-2 will be detailed in the post-construction O&M plan, which is scheduled to be submitted after approval of the RACR for Parcel B-2 in 2016." Please explain the status of O&M requirements during the period of time after transfer and before this anticipated revised long-term plan.	The cited text has been deleted because the final operation and maintenance (O&M) plan for Parcel B-1 has been prepared. The remaining text has been revised to reference the final O&M plan (Engineering/Remediation Resources Group Inc. [ERRG] 2016).

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/ Page	Comment	Response to Comment
6.	Section 3.1.4, Radiological Concerns, Pages 6 and 7	Please include a brief summary of the remedy selected in the ROD to address radiological contamination of buildings, sewers, and storm drains.	The text has been expanded as follows. "The TCRA involved excavating radiologically impacted storm drain and sanitary sewer lines and surrounding soil to achieve the removal action cleanup objectives. A total of 6,610 soil samples were collected to support the radiological removals across Parcel B. *The TCRA also included decontaminating radiologically impacted structures, surveying building and former building sites, screening removed materials, and transporting contaminated materials off site to an appropriate disposal facility*. The TCRA met the remedial action objectives in the amended ROD…"

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/ Page	Comment	Response to Comment
7.	Section 3.5, Asbestos-Containing Material, Page 9	Please clarify at the beginning of the paragraph that all the buildings listed are located in Parcel B-1. Please also clarify at the end of the paragraph that some buildings have been remediated, but that in spite of remediation ACM or suspected ACM remains in all buildings on Parcel B-1. More specifically, the first paragraph states that asbestos-containing material (ACM) debris was "repaired, encapsulated, or removed and disposed" between 1995 and 1997 "in 82 buildings at HPNS [Hunters Point Naval Shipyard]," but does not list the buildings in Parcel B-1 that were included in this action. The affected Parcel B-1 buildings are listed for the 1993 survey and the 2001-2002 survey. Please revise the text to list the B-1 buildings that were included in the 1995-1997 ACM action	The text already indicates "Buildings 103, 104…and 163 at the Property…" The text at the end of the paragraph has been expanded as follows. "*Even though remediation has been conducted*, ACM or suspected ACM *is assumed to* remain in all buildings at the Property *and any remaining steam lines at the Property*." The text has been expanded as follows to describe ACM remediation. "Buildings 103, 104, 109, 113, 113A, 115, 116, 117, 120, 121, 122, 123, 125, 144, 146, 150, 156, and 163 at the Property were found to contain either ACM, assumed ACM, or suspected ACM. The Navy PWCSFB conducted remediation for ACM *in these buildings* in 1995 to 1997 *(except Buildings 122, 144, and 150, where no remediation was required)*."
8.	Section 3.6, Lead-based Paint, Page 10	To clarify, we suggest you specify that comments apply to "all" buildings. For example, here are suggested edits: "however, all buildings on the Property are assumed to contain LBP based on their known or assumed dates of construction. All of the buildings at the Property were constructed in the 1940s and 1950s."	The text has been revised as requested.

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/ Page	Comment	Response to Comment
9.	Section 3.6, Lead-based Paint, Page 10	Lead-based paint (LBP) chips sometimes flake off buildings at Parcel B-1, and they move over the durable cover through swales toward San Francisco Bay. At Parcel B-1, the Navy has implemented best management practices (BMPs) such as installing a series of wattles to trap and limit this release. Paragraph 3 will be more thorough and accurate if it makes reference to this movement of LBP and the Navy's measures to address it.	The Navy is not aware of any LBP that has been released into the environment and poses a threat to human health on the Property. In addition, land use restrictions that will be carried forward for the entire area of the Property will ensure that any potential LBP in soil that may exist in the vicinity of the structures will remain beneath the durable cover and will not pose a human health threat.
10.	Section 3.7, Polychlorinated Biphenyls, Page 11, Paragraph 3	Were the remaining transformers removed and disposed of as scheduled in 1998? If documentation of the 1998 removal and disposal is not available, then if these could potentially still remain on the site inside of buildings, then please document this possibility and specify whether buildings where they could be located are secured.	The sentence describing the planned removals has been deleted to avoid confusion. The three pieces of electrical equipment in question all have polychlorinated biphenyl (PCB) contents less than 50 parts per million (ppm) and, therefore, would be classified as "non-PCB" under the Toxic Substances Control Act. The PCB content of these pieces of equipment is also less than 5 ppm, which is the California threshold for disposal of PCB waste liquid.
11.	Section 4.0, Adjacent Parcels, Page 12	To be more complete, please add that Parcel B-2 is located to the northeast and east of Parcel B-1 and Parcel C is located to the southeast of Parcel B-1.	The text has been revised as requested.

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/ Page	Comment	Response to Comment
12.	Section 4.0, Adjacent Parcels, Page 13	The description of the soil remedial action at Parcel B-2 should be updated to state that the construction of the shoreline revetment is complete (i.e., it is no longer 87 percent complete and the revetment now covers the 230 feet of shoreline where its construction had been stopped due to the discovery of total petroleum hydrocarbon [TPH]-contaminated soil).	The text has been revised as follows to indicate that the remedy for soil has been completed. "Excavation and off-site disposal in selected areas *has been* ~~is partially~~ completed. Soil that exceeded the remediation goal for lead was excavated and disposed of off site from one area in 2010 (ERRG 2011). Remediation for TPH-contaminated soil *has been* ~~is being~~ completed within the southeastern ends of corrective action area [CAA] 21 and AOC 46-B (ERRG 2015b). Installation of parcel-wide durable covers, *including the shoreline revetment, has been* ~~is mostly~~ completed. ~~Construction of the asphalt cover is complete, and construction of the shoreline revetment is about 87 percent complete. About 230 feet of shoreline within or adjacent to CAA-21 remains unfinished, pending completion of the excavation and disposal of TPH-contaminated soil described above~~."

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RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/ Page	Comment	Response to Comment
13.	Section 4.0, Adjacent Parcels, Page 13 and 14	Please add more details regarding potential contamination from VOC's in soil vapor from Parcel B-2 and Parcel C.	The text in the third paragraph has been revised as follows. "~~However, t~~The soil gas survey conducted in 2010 at Parcel B (Sealaska 2013) included samples along the boundary between the Property and Parcel C and *indicated there is a potential for soil gas to migrate from Parcel C to the Property*~~, therefore, provides an indication of potential soil gas migration~~." The text already indicates that "Areas of known VOC contamination in soil and groundwater at Parcel C have been adequately characterized and are undergoing active remediation. Remediation is expected to address any potential migration of VOCs in soil gas from Parcel C."

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RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/ Page	Comment	Response to Comment
14.	Section 4.0, Adjacent Parcels, Northeast – Parcel B-2 and San Francisco Bay (Parcel F), Page 13, Second Paragraph, First Sentence	Please remove the second period.	This typographical error has been corrected.
15.	Section 4.0, Adjacent Parcels, Page 14	Please revise the text to provide more complete information about the relation between groundwater contamination at RU-C5 and Parcel B-1, including whether any contamination has migrated onto Parcel B-1 and the timeframe for remediation of this groundwater contaminant plume.	The text has been expanded as follows. *"COCs in groundwater at RU-C5 have not migrated to the Property."*
16.	Section 4.0, Adjacent Parcels, Page 14	Please revise the text to include the timeframe for soil gas remediation in Parcel C areas that are adjacent to Parcel B-1.	The text has been expanded as follows. "**Soil gas:** *SVE for source reduction of VOCs (in progress). The operational goal is for VOC concentrations to be consistently less than treatment criteria with decreasing trends by the end of 2018.*"

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/ Page	Comment	Response to Comment
17.	Section 4.0, Adjacent Parcels, Page 14	The text under "Ongoing and completed remedial actions," has a single statement about remediation of groundwater contamination at Parcel C, but a number of treatability studies have reduced groundwater contaminant concentrations in RU-C5. Since groundwater in this area is flowing onto Parcel B-1, the FOST would provide a complete picture if it included a summary of previous actions that have reduced levels of contamination in groundwater at RU-C5.	The text has been expanded as follows. "*Previous treatability studies at RU-C5 have also reduced the concentrations of VOCs in groundwater using a variety of methods including thermal conduction heating, soil vapor extraction, and aerobic and anaerobic biodegradation (IT Corporation 2001, Shaw 2005, CDM Smith 2012).*"
18.	Table A-1	The Summary of Hazardous Substances Stored, Disposed of, or Released, only includes information about substances that were released. Please add hazardous substances stored or disposed of at the Property to the table, such as source chemicals. For example, chromic acid would have been used for certain types of plating at IR-10 because there was hexavalent chromium plume outside the west wall/loading dock. The source was probably excavated with the storm drains and sanitary sewers. The Navy also probably used specific pesticides (e.g., DoD routinely used certain pesticides when they had wood buildings).	Although past chemical use could be presumed based on former Navy activities, records of chemicals stored or disposed of at Parcel B-1 are not available. Consequently, Table A-1 was not revised.

RESPONSES CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL (DTSC) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015

Comment Number	Section/ Page	Comment	Response to Comment
Responses to Comments from California Department of Toxic Substances Control (Nina Bacey, dated March 26, 2015)			
Specific Comments			
1.	Section 3.1	Indicates the amended remedy included Institutional Controls (ICs) for radiologically impacted soil and structure. It also included ICs for other COCs in soil and groundwater that exceed screening level goals. Please revise.	The text has been revised as follows. "Finally, the amended remedy *was* also *expanded to* include~~d~~ ~~institutional controls (IC) and~~ cleanup of radiologically impacted soil and structures *and institutional controls (IC) for soil, soil gas, and groundwater*."
2.	Section 3.7	It is not clear if the electrical equipment that was scheduled to be removed and disposed of in 1998 was removed. Please clarify.	The sentence describing the planned removals has been deleted to avoid confusion. The three pieces of electrical equipment in question all have PCB contents less than 50 ppm and, therefore, would be classified as "non-PCB" under the Toxic Substances Control Act. The PCB content of these pieces of equipment is also less than 5 ppm, which is the California threshold for disposal of PCB waste liquid.

RESPONSES CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL (DTSC) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/ Page	Comment	Response to Comment
3.	Section 3.7	Indicates a survey was conducted in 2001 and 2004 for IPE that may contain PCBs. It is not clear why the other items listed that may also contain PCBs (e.g. elevator motors, powerhouse generators) were not included in the survey. Please clarify.	The cited statement was included only to clarify the scope of the survey of industrial process equipment (IPE). Other electrical equipment that might have contained PCBs was included in the previous basewide equipment surveys, discussed earlier in Section 3.7. The text was not revised as a result of this comment.

RESPONSES CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL (DTSC) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/ Page	Comment	Response to Comment
4.	Section 4.0, South – Parcel C and Former Parcel A, Page 14	Indicates there are no potential impacts to Parcel B-1 from this Parcel because it has been transferred. It is not clear that no COCs remain on Parcel A. If there are no COCs in groundwater or soil vapor at concentrations that exceed screening levels, that may migrate to Parcel B-1, this should be indicated. • Paragraph 3. The following sentence is not clear and should be revised as follows: However, the soil gas survey conducted in 2010 at Parcel B (Sealaska 2013) included samples along the boundary between the Property and Parcel C and, **results indicate there is a potential for soil gas migration from Parcel C to Parcel B**. • Ongoing and completed remedial actions – Groundwater – The word **destroy** is not appropriate. Please replace.	The text of the first paragraph has been expanded as follows. "Former Parcel A…deleted from the NPL. *No COCs remain in groundwater or soil vapor at concentrations that exceed screening levels that may migrate to the Property*. Therefore…" The text in the third paragraph has been revised as follows. "~~However, t~~The soil gas survey conducted in 2010 at Parcel B (Sealaska 2013) included samples along the boundary between the Property and Parcel C and *indicated there is a potential for soil gas to migrate from Parcel C to the Property*~~, therefore, provides an indication of potential soil gas migration~~." The word "destroy" has been replaced as follows. "Treatment using ZVI or biological substrate to *break down* ~~destroy~~ VOCs (in progress)."

RESPONSES TO SAN FRANCISCO BAY REGIONAL WATER QUALITY CONTROL BOARD (WATER BOARD) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015

Comment Number	Section/Page	Comment	Response to Comment
Responses to Comments from San Francisco Regional Water Quality Control Board (Tina Low, dated April 20, 2015)			
General Comment			
1.	---	This report includes forward-looking statements that refer to documents or actions that are not yet finalized or completed. As these documents/actions become finalized, I may have additional comments. The Remedial Action Completion Report (RACR) for Parcel B-1 is at the Draft stage, and I submitted comments April 8, 2015. Comments submitted on the draft RACR will need to be adequately addressed before the FOST can be finalized.	Comment noted. The FOST has been updated to account for comments on the RACR.

RESPONSES TO SAN FRANCISCO BAY REGIONAL WATER QUALITY CONTROL BOARD (WATER BOARD) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/Page	Comment	Response to Comment
Specific Comments			
2.	Section 3.1, Comprehensive Environmental Response, Compensation, and Liability Act	In the text, please clarify whether the original 1997 Parcel B Record of Decision (ROD) included cleanup of impacted soil and structures, or whether this was added in the 2009 Amended ROD. If radiological cleanup was not included in the 1997 ROD, please explain why not and how it was deemed necessary to include the cleanup in the 2009 Amended ROD.	Section 3.1 already states "Updated information gained from…a historical radiological assessment (HRA) indicated that an amended ROD would be required." Section 3.1.4 describes the HRA that was conducted, post-ROD, in 2004 and was the basis for including remedial actions for radionuclides in the 2009 amended ROD. Section 3.1 has been revised as follows to further clarify that actions for radionuclides were added in the amended ROD. "Finally, the amended remedy *was* also *expanded to* include~~d~~ ~~institutional controls (IC) and~~ cleanup of radiologically impacted soil and structures…."
3.	Section 3.6, Lead-Based Paint	The third paragraph of this section states that "The Navy is not aware of any LBP [lead-based paint] that has been released into the environment and poses a threat to human health on the Property." However, as discussed in Section 5.3, lead from LBP may exist in soil surrounding buildings from weathering of LBP. LBP chips have been observed on the durable cover throughout the base. Please clarify the statement in Section 3.6 to discuss the peeling/weathered LBP chips.	The cited statement accurately represents the Navy's position. Section 5.3 already states that lead from LBP may exist in soil surrounding buildings that may have been stripped from the buildings through normal weathering. The report was not changed as a result of this comment.

RESPONSES TO SAN FRANCISCO BAY REGIONAL WATER QUALITY CONTROL BOARD (WATER BOARD) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/Page	Comment	Response to Comment
4.	Section 3.7, Polychlorinated Biphenyls (PCBs)	Please clarify in the text whether the three pieces of electrical equipment (containing PCBs), that were abandoned or out of service, were disposed of offsite. The text states that the pieces of equipment were scheduled to be removed and disposed of offsite in 1998, but does not state that the disposal actually occurred.	The sentence describing the planned removals has been deleted to avoid confusion. The three pieces of electrical equipment in question all have PCB contents less than 50 ppm and, therefore, would be classified as "non-PCB" under the Toxic Substances Control Act. The PCB content of these pieces of equipment is also less than 5 ppm, which is the California threshold for disposal of PCB waste liquid.

RESPONSES TO CITY AND COUNTY OF SAN FRANCISCO (CITY) COMMENTS ON THE DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL G, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015

Comment Number	Section/Page	Comment	Response to Comment
Responses to Comments from City and County of San Francisco (Amy Brownell, dated June 25, 2015)			
General Comments			
1.	---	SFDPH may have additional comments on the FOST following receipt of Navy response to comments on the Draft Remedial Action Completion Report for Parcel B-1 particularly in relation to the remedial action at Building 123/IR-10.	Comment noted. The FOST has been updated to account for comments on the RACR.
2.	---	It would be very helpful for preparation of subsequent documents that are necessary for the transfer, e.g. the Statement of Facts for the Covenant to Restrict Use of Property and Section 2.0 of the Risk Management Plan, if you could list the specific COCs that remain in soil, groundwater, and soil gas at concentrations above remedial goals or action levels. If you do not wish to include this information in the FOST, it would be helpful if this information could be sent separately.	Comparison of existing concentrations to remediation goals is beyond the scope of a FOST. The table in Appendix A adequately discloses the chemicals that may be present at the Property.
Specific Comments			
3.	Section 3.3.1, Pre-ROD Removal Actions, page 4	Please clarify whether sand blast grit was removed from Parcel B-1.	The text of Section 3.1.1 has been revised as follows. "Approximately 4,665 tons of sandblast grit was collected from areas across HPNS, *including Parcel B*, and consolidated at Parcel E (Battelle 1996)."

RESPONSES TO CITY AND COUNTY OF SAN FRANCISCO COMMENTS ON THE REVISED DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/Page	Comment	Response to Comment
4.	Section 3.3.1, ASTs, page 8	Please add the reference which documents removal of the former ASTs at Buildings 115 and 120.	No additional references exist; the text was not changed. Evidence that the aboveground storage tanks (AST) are no longer present at the Property is based on a visual inspection conducted in January 2015.
5.	Section 3.5, Asbestos-Containing Materials, First paragraph, page 9	At the end of the paragraph it says ACM remains in all buildings. Later, in the notice Section 5.2 it says that ACM is presumed to exist on any steam lines remaining on the property. If this is the case, this fact should be stated in Section 3.5.	The text of Section 3.5 has been expanded as follows. "*Even though remediation has been conducted*, ACM or suspected ACM *is assumed to* remain in all buildings at the Property *and any remaining steam lines at the Property*."
6.	Section 3.7, PCBs, page 11	Please clarify whether the PCB-bearing electrical equipment scheduled for removal in 1998 was in fact removed from Parcel B-1 as planned.	The sentence describing the planned removals has been deleted to avoid confusion. The three pieces of electrical equipment in question all have PCB contents less than 50 ppm and, therefore, would be classified as "non-PCB" under the Toxic Substances Control Act. The PCB content of these pieces of equipment is also less than 5 ppm, which is the California threshold for disposal of PCB waste liquid.

RESPONSES TO CITY AND COUNTY OF SAN FRANCISCO COMMENTS ON THE REVISED DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/Page	Comment	Response to Comment
7.	Section 4.0, Adjacent Parcels, second paragraph, page 12	This paragraph states: "There is little potential for radioactive materials in adjacent parcels to pose a risk at the Property. The only potential exposure pathway for radiological exposure would be via inhalation of windblown dust from uncovered areas. The Navy maintains active dust control measures for all radiologically impacted areas at HPNS, including those adjacent to the Property (Tetra Tech EC, Inc. 2009). The basewide radiological contractor periodically measures the dose rate at the perimeter of all radiologically impacted areas, and these measurements indicate no migration of radiological materials. Likewise, basewide monitoring for dust does not indicate radioactive contamination in the dust." The wording in this paragraph is awkward and is suggesting a possibility that we don't think exists. All of the radiological cleanup work has been completed on all sides of Parcel B-1 – correct? So there are no areas with any possible radiological contamination in proximity to B-1. And the majority of the areas around B-1 also have a durable cover installed with the exception of the area adjacent to Parcel C near IR-06 and Bldg 134 where there is ongoing SVE and other remediation. But those uncovered areas	Windblown dust may migrate onto the Property from anywhere on Hunters Point Naval Shipyard (HPNS). This paragraph is intended to address this fact. The majority of this paragraph was added, verbatim, based on city comments on the identical section of the FOST for Parcels UC-1 and UC-2 (see city comment 3 dated June 4, 2013). The text was not changed as a result of this comment.

RESPONSES TO CITY AND COUNTY OF SAN FRANCISCO COMMENTS ON THE REVISED DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/Page	Comment	Response to Comment
7. (con't)	Section 4.0, Adjacent Parcels, second paragraph, page 12	do not have any remaining radiological concerns. And your paragraph makes the argument that even if dust exists, your monitoring does not indicate radioactive contamination in the dust. We recommend deleting this paragraph.	Response included above.
8.	Section 4.0, Adjacent Parcels, Northwest – IR Sites 7 and 18, first two paragraphs	We recommend deleting the first two paragraphs because they are describing possibilities that might have occurred prior to the IR Sites 7 and 18 FOST being issued and the methane probes having been removed. And then adding a paragraph after the one entitled "Completed Remedial Actions" and explain in a few sentences that this site has been found suitable for transfer in an approved FOST (with information on regulatory concurrence.) And then describe why the property does not pose of risk from groundwater, soil gas or contaminants in soil, including radiological materials because all necessary remediation was undertaken and the FOST documented that the property is suitable for transfer for the intended use.	The descriptions of the potential for groundwater or soil gas to migrate to the Property are accurate and have been maintained to promote consistency with the descriptions for other adjacent parcels. This section has been expanded as follows to introduce the final FOST for IR Sites 7 and 18. "*IR Sites 7 and 18 have been found suitable for transfer, as summarized in the Final FOST for IR Sites 7 and 18 (ChaduxTt 2013).*"

RESPONSES TO CITY AND COUNTY OF SAN FRANCISCO COMMENTS ON THE REVISED DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/Page	Comment	Response to Comment
9.	Section 4.0, South – Parcel C and former Parcel A, page 14, paragraph 2	Section 4.0 states "Groundwater flows from IR Site 25 at adjacent Parcel C onto the Property. Groundwater in this area (termed RU-C5) has been adequately characterized and is being actively remediated. Remediation is expected to address any potential migration of VOCs in groundwater from Parcel C." Please clarify that the RU-C5 plume at Parcel C extends onto Parcel B-1 as evidenced by vinyl chloride concentrations in groundwater greater than RGs at well IR20MW17A and that remediation at Parcel C is "expected to address any ongoing migration" of VOCs from Parcel C to Parcel B-1.	The Navy does not agree that vinyl chloride concentrations observed in samples from well IR20MW17A demonstrate migration of volatile organic compounds (VOC) from Parcel C onto the Property. The text was not changed as a result of this comment.
10.	Section 4.0, South – Parcel C and former Parcel A, page 14, paragraph 3, last sentence	Please state that soil gas confirmation sampling will be conducted to confirm that the remediation has addressed any potential soil gas migration from Parcel C.	The text has been expanded as follows. "*Soil gas confirmation sampling will be conducted in remediation areas to confirm the remediation has addressed the potential for soil gas migration.*"
11.	Section 5.3, Lead-Based Paint, page 15	Consistent with recent clarification edits that were made to the UC1 and UC2 deeds, please add "resulting from LBP" following the phrase "soil-lead hazards" in the 12th and 16th lines of this paragraph.	The text has been revised as requested.

RESPONSES TO CITY AND COUNTY OF SAN FRANCISCO COMMENTS ON THE REVISED DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/Page	Comment	Response to Comment
12.	Section 7, Covenants, Lead-Based Paint, page 18	Consistent with recent clarification edits that were made to the UC1 and UC2 deeds, please add "resulting from LBP" following the phrase "soil-lead hazards" in the 4th line of the paragraph.	The text has been revised as requested.
13.	Figure 5, Petroleum Program	Please show the locations of the former ASTs at Buildings 115 and 120 on Figure 5.	Section 3.3.1 has been expanded to indicate that the exact former locations of the ASTs at Buildings 115 and 120 are unknown. Figure 5 has not been revised.
Minor Comments			
14.	General	Check acronyms singular or plural e.g., VOCs versus "VOC"; "AST" versus ASTs.	The FOST has been checked for consistent acronym usage.
15.	Section 2.0, Property Description, page 1, paragraph 1, 1st sentence	Awkward "San Francisco Bay, California."	The text clearly states the physical location of HPNS and was not changed.
16.	Section 3.3.3, Fuel Pipelines	Refer to Figure 5.	The text has been expanded as follows. "*Figure 5 shows the locations of fuel pipelines*."

RESPONSES TO CITY AND COUNTY OF SAN FRANCISCO COMMENTS ON THE REVISED DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL B-1, HUNTERS POINT NAVAL SHIPYARD, SAN FRANCISCO, CALIFORNIA, DATED MARCH 2015 (CONTINUED)

Comment Number	Section/Page	Comment	Response to Comment
17.	Section 4.0, Northeast, page 13, paragraph 2, 1st sentence	Typo – double periods.	This typographical error has been corrected.

REFERENCES

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