Message

From: LEE, LILY [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D6085A744F9347E6836C54C0E85B97B2-LLEE06]
Sent: 5/12/2018 4:17:08 PM
To: Brasaemle, Karla [Karla.Brasaemle@TechLawInc.com]
Subject: RE: What was EPA's role @ Parcel A?
Attachments: AB-62 3141 Final FOST(Rev03)_Parcel A.pdf

Dear Karla,

Thank you for letting me know. I am trying to fill in the history of EPA's role. I have some clues from the FOST.

3.0 REGULATORY COORDINATION

The Navy issued Revision 1 of the basewide EBS for HPS on September 4, 1998. EPA, DTSC, the City and County of San Francisco Department of Public Health (SFDPH), and the San Francisco Redevelopment Agency (SFRA) received draft versions of Revision 1 of the basewide EBS for review. Revision 1 of the basewide EBS classifies the installation property in accordance with the DoD's ECP Area Type categories.

EPA, DTSC, and RWQCB participated throughout the remedial investigation (RI) process at Parcel A and were consulted during development of the ROD for Parcel A. EPA concurred with the findings of the investigations at Parcel A on November 8, 1995, and signed the ROD for Parcel A on November 29, 1995. DTSC and RWQCB also concurred and signed the ROD for Parcel A on November 28, 1995. EPA considers the ROD for Parcel A the decision document demonstrating that the Navy has (1) complied with Section 120(h)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, and (2) taken all necessary remedial actions.

EPA and DTSC participated in a scoping meeting for the FOST for Parcel A on March 26, 1996, to initiate the regulatory agency consultation process and discuss the content of the document. The draft version of the FOST for Parcel A was submitted to the regulatory agencies, SFDPH, and SFRA in June 1996 for review and comment. Written comments from the regulatory agencies and SFDPH were received in July 1996. The Navy submitted written responses to the comments to the regulatory agencies and SFDPH in August 1996. In November 1996, SFDPH sent a letter stating that the Navy's responses to the comments on the draft FOST for Parcel A did not adequately address SFDPH's concerns about lead-based paint (LBP) in soil.

As a result of the SFDPH letter, the Navy collected additional soil samples for analysis of lead at Parcel A in 1997 (Section 5.3). The regulatory agencies and SFDPH reviewed the results of the supplemental sampling and concurred that the Navy had adequately characterized Parcel A for lead in soil. In November 1998, the Navy submitted revised responses to comments on the draft FOST for Parcel A that updated the information on lead in soil (TtEMI 1998b; also see Attachment 1); the Navy, EPA, and SFDPH developed the revised response in a collaborative process. The draft final version of the FOST was submitted in February 1999 for review and comment. Comments and responses on the draft final FOST (Attachment 2) were incorporated into the final FOST that was submitted in February 2000. The final FOST was revised in January 2001 to document that the NEPA process was complete and to include the formal Navy signature in the final FOST.

The final FOST was revised a second time in March 2002 to include an updated boundary map for Parcel A (Figure 2) and more current information about radiological clearance and other activities at Parcel A. The March 2002 version is referred to as the draft FOST, Revision 2.

The Navy opened a public review and comment period for the draft FOST, Revision 2, from March 27 to May 28, 2002. In addition, a public meeting was held on April 18, 2002, to

solicit comments on the draft FOST, Revision 2. The Navy submitted responses to regulatory agency and public comments on the draft FOST, Revision 2, on August 26, 2002, and onSeptember 5, 2002; these responses are presented in Attachments 3 and 4. On March 19, 2004,
the Navy published a draft final FOST for Parcel A, Revision 2. Attachment 5 presents the Navy's proposed resolution for comments received .
This document, the final FOST, Revision 3, includes additional information about radiological clearance and work that addresses monitoring and control of landfill gas to support resolution of these issues. The final FOST, Revision 3, also provided an updated boundary map for Parcel A. As described in Section 2.0, the boundary of Parcel A was adjusted to allow surveys at Buildings 819 (pump station A) and 813, which are recommended in the final HRA (RASO 2004). The Navy prepared responses to regulatory agency comments received on the draft final FOST, Revision 3; these responses are presented in Attachment 6. In addition, DTSC had one unresolved comment, and this comment is presented in Appendix A.
In December 1998, EPA announced its intent to delete Parcel A from the National Priorities List (NPL) because all appropriate response actions have been taken. The State of California concurred, and Parcel A was officially deleted from the NPL on April 5, 1999. Although the boundary of Parcel A has been modified since the property was deleted from the NPL, the areas within the current boundary are wholly contained within the portions deleted from the NPL. (In other words, some of the original Parcel A property was moved to adjacent parcels.)

From: Brasaemle, Karla [mailto:Karla.Brasaemle@TechLawInc.com]
Sent: Friday, May 11, 2018 2:55 PM
To: LEE, LILY <LEE.LILY@EPA.GOV>
Subject: RE: What was EPA's role @ Parcel A?

Yes, I remember visiting Parcel A the very first time I visited Hunters Point. Claire Trombadore and I visited several other times as well, including one time to look at excavations that had been done (for the black beauty sand removal). EPA also reviewed the SI (before my time), RI/FS (first document that I was involved with reviewing for Parcel A), proposed plan, ROD, etc.

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From: LEE, LILY <LEE.LILY@EPA.GOV>
Sent: Friday, May 11, 2018 2:37 PM
To: Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>
Subject: What was EPA's role @ Parcel A?

I know that Steve did 322 scans. We reviewed the various documents along the way, I assume.

What else did we do? e.g. did we do site visits?

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