From:	Huang, Judy
To:	Robinson, Derek J CIV NAVFAC HQ, BRAC PMO
Cc:	Ohannessian, Sharon A CTR NAVFAC HQ, BRAC PMO; Lane, Jackie; LEE, LILY; Janda, Danielle L CIV (danielle.janda@navy.mil); "Bacey, Juanita@DTSC"; Tanouye, David@Waterboards; White, Jeff (Jeff.White@Waterboards.ca.gov); Brownell, Amy (DPH)
Subject:	EPA HPS Parcel F Draft Proposed Plan Comments
Date:	Monday, March 05, 2018 7:20:00 AM

Hi Derek:

EPA reviewed the Hunters Point Naval Shipyard – Parcel F Proposed Plan for Offshore Sediment Cleanup dated February 19, 2018 and had the following comments:

1. Institutional Controls (IC) costs may not have been accurately reflected. If necessary, please revise the Draft Final Proposed Plan (DFPP) to accurate reflect the total proposed remedy cost. I went back to the 2008 Feasibility Study (2008 FS) and followed the calculations for the IC implementation cost, since the cost in the DFPP is just an escalation of the 2008 cost estimate to 2017 dollars. According to the 2008 FS, for Area III, the IC implementation cost for Alternative 4/4A was based on the IC implementation cost for Alternative 3. In the remedy description for Alternative 3, is it is unclear if ICs were only proposed for the cap area or for the entire Parcel F (Pages 3-3 through 3-8 and Page 4-20 of the 2008 FS). In the DFPP, for Area IX and X, Alternative 7 also includes the same IC implementation costs. Since, the total remedy cost in the DFPP is the sum of Alternative 4/4A and Alternative 7, the DFPP may have overestimated the cost of the preferred alternative. If the 2008 FS IC implementation cost is for each sub area only, than you under estimated the Parcel F IC implementation cost (What is the IC implementation cost associated with area of Parcel F outside Aras III, IX, and X?). If the 2008 FFS IC implementation cost is for entire Parcel F, than you double counted the ICs implementation cost (over estimation of about $996,000). Based on Table D of the 2008 FFS, I am guessing you over estimated. Please double check the numbers.
2. If possible only bold the term the first time it appears in the document.
3. If possible, reduce the number of font types and sizes used in the document. EPA recommends using size 12 font for text and size 14 font for the titles.

Please call me or send me an email if you have any questions or comments.

Thank you.

Judy

Judy C. Huang, P.E.
Remedial Project Manager
Superfund Division
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street (SFD-8-3)
San Francisco, CA 94105
Phone: 415-972-3681
FAX: 415-947-3520