

ATTACHMENT B
RESPONSIVENESS SUMMARY

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Proposed Plan for Parcel D, Hunters Point Shipyard		
Spoken Comment by Kristine Enea received at the public meeting held July 30, 2008		
Comment Number	Comment	Response
1	<p>I feel comfortable that the RAD material will not escape the trucks. However, trucks themselves sometimes take dirt out with them. I've seen trucks come out with dirt on the fender. So my request would just be to make sure that the trucks themselves are clean of dirt, not because I'm afraid of radiological contamination, but because I live on Innes Avenue. All the trucks go by my house, and our houses are kind of dirty.</p> <p>[Refer to the transcript of the public meeting beginning on page 38 for the complete comment.]</p>	<p>Appropriate engineering measures (for example, inspecting and cleaning trucks before they leave the site) will be used during and following remediation to further protect the surrounding Bayview Hunters Point community. Furthermore, radiologically impacted material is transported off site in sealed containers to prevent any releases.</p>

ATTACHMENT B. RESPONSIVENESS SUMMARY

Proposed Plan for Parcel D, Hunters Point Shipyard		
Spoken Comments by Ahimsa Sumchai received at the public meeting held July 30, 2008		
Comment Number	Comment	Response
1	<p>I wanted to go on record as being very, very strongly opposed to a proposal to early transfer. Parcel UC-1, I am strongly opposed to any plan to dirty-transfer a parcel that in its reuse is expected to be a site for residential development. And Parcel UC-1 is slated for mixed-use development under the current redevelopment plan.</p> <p>[Refer to the transcript of the public meeting beginning on page 39 for the complete comment.]</p>	<p>Parcel UC-1 consists mostly of a portion of Spear Avenue. Figure 4 in the Proposed Plan shows a portion of Parcel UC-1 is planned for mixed use. However, residential reuse of this street area is unlikely. Furthermore, no data were collected within Parcel UC-1 because no historical activities with risk concerns took place in this area. Nevertheless, all of Parcel UC-1 will be covered to protect all users from exposure to the surface soil.</p>
2	<p>Additionally, Parcel UC-1 is adjacent to Redevelopment Block 30A, which you have identified as being a region in which the soil concentrations approached 10^{-6}, and that concerns me. The risk, of course, is 10^{-5}.</p> <p>So I really do think that we are identifying a region of Parcel D that is at significant risk for human exposure and that – you’ve documented that, and I just think it doesn’t make common sense to not do a full cleanup of a parcel that is potentially slated for residential development.</p> <p>[Refer to the transcript of the public meeting beginning on page 39 for the complete comment.]</p>	<p>Table 1 in the Proposed Plan shows that the cancer risk at Redevelopment Block 30A based on residential exposure to chemicals is 2×10^{-7} and for exposure to radionuclides is 1×10^{-6}. Both these risk values are less than the range that the Navy and the regulatory agencies consider as acceptable.</p> <p>The goal of the remedial action at Parcel D-1, D-2, G, and UC-1 is to protect human health and the environment to the standards set by the federal and state regulatory agencies. The remedies proposed in the proposed plan, and detailed in this Record of Decision (ROD), address all contamination that resulted from past Navy activities. After all the proposed actions are conducted and operation and maintenance and institutional controls (IC) are implemented, the actions proposed will be protective of human health and the environment.</p>
3	<p>Additionally, it violates community acceptance, as documented in Proposition P, which was passed by the overwhelming majority of San Francisco voters in the year 2000 and that called for cleanup of the Shipyard to residential standards.</p> <p>[Refer to the transcript of the public meeting beginning on page 39 for the complete comment.]</p>	<p>The goal of the remedial action at Parcels D-1, D-2, G, and UC-1 is to protect human health and the environment to the standards set by the regulatory agencies. Cleanup goals consider the expected future land use so not all areas will be remediated to residential levels. For example, areas that will become open space will be remediated to standards that consider recreational use. Nevertheless, all of Parcels D-1, D-2, G, and UC-1 will be covered to protect all users from exposure to the surface soil. Community acceptance is considered in the ROD as required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).</p>

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Written Comments by City and County of San Francisco received August 15, 2008 by email		
Comment Number	Comment	Response
1	<p>In the Overview of Proposed Institutional Controls, Proposed Activity Restrictions Relating to VOC vapors at Specific Locations within Parcel D-1 and G, it states that “Initially, the ARIC includes all of Parcel D-1 and G”. We think this is a misrepresentation of the current state of knowledge about the ARIC for VOC vapors and unnecessarily restricts Parcel D-1 and G. Our request is to phrase the restriction as “Initially, the ARIC will include all areas of the Parcels D-1 and G with soil gas levels above the remediation goals.” This sentence more accurately reflects the current state of knowledge about the ARIC for VOC vapors and describes where the ARIC will be required. The soil gas surveys will be performed in areas where past uses and data suggest possible concerns regarding soil gas. However, based on the current knowledge of the site we are certain that there are many areas where: (a) no soil gas sampling will be required and (b) there will be no requirement for an ARIC for VOC vapors.</p>	<p>The area requiring institutional controls (ARIC) for vapor intrusion may be modified as remediation is completed or in response to further sampling and analysis that establishes that areas now in the ARIC do not pose unacceptable potential exposure risk to volatile organic compound (VOC) vapors. The initial ARIC is proposed to include the entire area of Parcels D-1 and UC-1 because existing data for soil gas are insufficient to further reduce the size of the ARIC.</p>
2	<p>Soil gas remediation goals need to be established in the Parcel D-1 and G RODs. The language relating to soil gas remediation goals on page 8 of the Proposed Plan, which states that a numerical goal for each VOC will be established <i>in the remedial design (RD)</i> and on page 14, that survey results <i>following remedial actions</i> will be used to establish risk-based remediation goals for soil gas should be changed to reflect that soil gas remediation goals will be established in the ROD. If the current schedule for the ROD would be impacted by the establishment of these soil gas goals, a mechanism for adding these goals to the ROD should be discussed.</p>	<p>The text on page 8 of the Proposed Plan was incorrect as stated. Remediation goals for VOCs to address exposure via indoor inhalation of vapors may be superseded based on COC identification information from future soil gas surveys. As potential risks from soil gas are partially dependent on the structures and other modifications that will be constructed for future use of the property, the soil gas risk calculations must wait until decisions are made on the proposed use designs (i.e., structures and ground cover layouts). Future action levels would be established for soil gas, would account for vapors from both soil and groundwater, and would be calculated based on a cumulative risk level of 10^{-6} using the accepted methodology for risk assessments at HPS.. The results of the survey will be used to evaluate the need for additional remedial action and to identify where the initial ARICs for VOCs shall be retained and areas where they shall be released.</p>

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3	<p>We appreciate that the Navy has revised the text of the proposed plan to discuss some of the remedy implementation plans in relation to reuse areas instead of redevelopment blocks. In future documents please continue to work towards the goal of dropping the use of the redevelopment blocks to describe areas of the parcel because land planning efforts are anticipating a change to the configuration of the blocks.</p>	<p>The proposed plan was revised to reduce the use of and emphasis on redevelopment blocks to the extent possible. However, a means to clearly and unambiguously identify areas within former Parcel D is still needed to explain the proposed remedial actions, and redevelopment blocks still serve that purpose. The Navy would appreciate communication from the city when changes to redevelopment blocks, and especially those changes that affect the reuse exposure, are identified.</p> <p>The Navy will work closely with the city to use the most current plans for land reuses at Parcel D. The Navy will continue to use redevelopment blocks, only when necessary, in the three RODs.</p>
4	<p>We would like to point out for the record, that once the engineering controls and institutional controls are properly installed and maintained the current design of the proposed remedies will cut off pathways for: (a) contact with soil contaminants and (b) inhalation of indoor VOC vapors and this means that the entire property will be health protective for all types of uses.</p>	<p>The proposed remedial alternatives are specific to the reuse identified for each area. Future residents would be protected in areas currently identified for industrial or recreational reuse only by the consistent enforcement of the activity restrictions described by the proposed ICs. For example, the ARIC for vapor intrusion would need to be maintained in areas currently identified as open space (unless the ARIC could be modified by new data for soil gas, as discussed above in the response to comment 1). The Navy believes that the proposed remedy would result in an environment that would not pose health risks for future residents. However, this does not mean that future reuse would be unrestricted. The following text was included on the first page of the proposed plan to note the general protectiveness of the planned revised remedy: <i>“After all the proposed actions are conducted and operation and maintenance and ICs are implemented, the actions proposed will be protective of human health and the environment and will meet all cleanup objectives.”</i></p>

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<p>Written Comments by J.V. McCarthy received by email on July 31, 2008.</p> <p>Only comments that specifically reference Parcel D (or the new Parcels G, D-1, D-2, or UC-1) are included in this Responsiveness Summary. All other comments were addressed in the Responsiveness Summary for Parcel B. Comment numbers reflect those used in the Responsiveness Summary for Parcel B.</p>		
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6	The basic issues cited for "Parcel G", per notice to Congresswoman N. Pelosi and Supervisor A. Peskin also apply to Covenant Restriction for "Parcel B" (refer to the following page with items # 1.-10.)	The Navy does not have a copy of this notice and cannot respond. However, the Navy team is aware of and is ensuring that there is consistency between land use restrictions being considered and developed for the different parcels.
Introduction to items 1-10	How inappropriate is a linking of "Candlestick Park" development with Hunter's Point Shipyard reuse? If "Parcel 49" of the former Hunter's Point Shipyard is to be considered fit for new stadium construction, the potential liability is worth more than a passing glance. A deferral or covenant agreement required as the waiver to federal conditions of the city's exclusive discretion, to federal conditions in transfer, is specified from CERCLA 120 h(3)(C). This is because the environmental remediation is not without conditions. No matter what the political priorities, the land speculation, or the wishful thinking, parcel areas requiring this kind of covenant agreement will remain so for good reasons (refer to CLEAN II, Department of the Navy, 09/04/98, HPS). "Parcel 49" is not exempt. The local SF CUPA or HAZMAT agency, the involved state agencies, and the title insurance people will all have serious obligations and concerns to be maintained.	Access restrictions on future activities will be contained in "Covenant(s) to Restrict Use of Property", Quitclaim Deed(s), the Risk Management Plan, and if required, any other workplan or document approved in accordance with these referenced documents. The protectiveness of the remedy will be evaluated at least every 5 years to ensure it remains protective. These 5-year reviews are required by law and will include any new information that may become available in the future.
Item 1	Subparcels S-28, S-29, S-38, and S-39 are co-located where "Parcel 49", formerly in Parcel D, has been proposed. All are cited for sandblast waste and radioactive materials, at least some of which are likely to have been left from "Operation Crossroads" (1946-1947, see "Historical Radiological Assessment", 2004).	Former Parcel D was constructed prior to "Operation Crossroads" and is not expected to have radioactive waste materials from that operation. Radiological surveys have been conducted in all areas and buildings at Parcels D-1 and UC-1 that have been identified, based on shipyard activities and work practices, to potentially be radiologically impacted. The areas identified as having radiological risks in the surveys are being addressed and radiologically remediated by the proposed remedy and released for unrestricted future use.

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Item 2	It is unlikely that the maximum extent of excavation in the foreseeable future, as sponsored by the Navy, will go any farther than the inconclusive excavation, to be capped, for IR-07 and IR-18 of Parcel B where the radiation at depth will go unresolved. Consider the implications in D for S-28, S-29, S-38, and S-39.	Please see the Responsiveness Summary in the Parcel B amended ROD for discussion of the IR Sites 7 and 18. All of Parcels D-1 and UC-1 will be covered to protect all users from exposure to the soil regardless of the future use. Covers are an effective way to eliminate exposure and protect human health.
Item 3	The materials applied for support piers to penetrate landfill are likely to be what is planned for building foundation support, as under the cap required for "Parcel 49" remediation.	Any construction-related foundation support piers constructed after transfer will be protective of human health and the environment, and will meet the requirements of the remedial design. Any breaching or alteration of the cover post-transfer will be conducted in compliance with the Covenant(s) to Restrict Use of the Property, Quitclaim Deed(s), and the Risk Management Plan, all of which will be reviewed and approved by the regulatory agencies. Materials used during remediation, including the cover material, will be selected during the remedial design phase of the project and will be constructed to be robust and persistent over time.

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Written Comments by J.V. McCarthy received by email on August 20, 2008.		
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1	As an hasty and inadequately addressed parcel transfer proposal, "Parcel G" is a good example of how the City of San Francisco, and some public officials, could bring great harm upon themselves. Who would bear ultimate "responsibility" with consequences (?) once an incomplete and inadequate investigation has been signed off, even with CERCLA 120 (h)(3)(C)? If "Blocks" # 28, 29, 38, and 39 are any example, perhaps it would be where existing documentation would suggest considerable more caution.	<p>If the property in Parcels D-1 and UC-1 are conveyed as an "early transfer" subject to the requirements of Section 120(h)(3)(C) of CERCLA, the Navy must provide assurances approved by EPA and the State of California that there will be interim land use restrictions to ensure the protection of human health and the environment.</p> <p>Access restrictions on future activities will be contained in "Covenant(s) to Restrict Use of Property", Quitclaim Deed(s), the Risk Management Plan, and if required, any other work plan or document approved in accordance with these referenced documents. The protectiveness of the remedy will be evaluated at least every 5 years to ensure it remains protective. These 5-year reviews are required by law and will include any new information that may become available in the future.</p>
2	Of "Block" 28, it appears to be unknown or unclear whether contaminants from IR-34 could include plume discovery, as from, storage tank contents unspecified at the Building 363 site.	There is no Redevelopment Block 28 within the former Parcel D or the new Parcels D-1 and UC-1. However, potential contaminants associated with IR-34 were evaluated for Parcel D and are summarized in the Final Revised Feasibility Study for Parcel D (SulTech 2007).
3	Of "Block" 29, it appears to be unknown or unclear whether multiple fluid contaminants or plume discovery, from IR-09 could have come into contact with or mixed with contaminants from IR-33.	Within Redevelopment Block 29, the potential mixing of contaminants between the IR-09 plumes and the IR-33 plumes was considered and is summarized in the Final Revised Feasibility Study for Parcel D (SulTech 2007). Block 29 is within Parcel G; therefore, this comment is not related to Parcels D-1 and UC-1.
4	Of "Block" 38, it appears to be unknown or unclear whether contaminants from IR-33, by the specified plumes at the Building 411 site, could have been complicated by radiological impact at the Building 364 site.	The contamination associated with Buildings 411 and 364 (they are both within IR-33) were evaluated in conjunction with Block 38. The chemical risks are presented in the Final Revised Feasibility Study for Parcel D (SulTech 2007) and the radiological risks and combined risks are presented in the Final Radiological Addendum to the Revised Feasibility Study for Parcel D (SulTech 2008). Block 38 is within Parcel G; therefore, this comment is not related to Parcels D-1 and UC-1.
5	Of "Block" 39, it appears to be unknown or unclear whether contaminants from IR-65 or IR-34, could include a plume discovery, as from the Building 324 site, or a radiological impact from the Building 364 site.	The contamination associated with IR-65, IR-34 and specifically the Building 324 site were evaluated as part of Redevelopment Block 39 in the Final Revised Feasibility Study for Parcel D (SulTech 2007). Radiological impacts associated with the Building 364 site are considered in the Final Radiological Addendum to the Revised Feasibility Study for Parcel D (SulTech 2008). Block 39 is within Parcel G; therefore, this comment is not related to Parcels D-1 and UC-1.

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6	The potential of radiological impact, as in residual unspecified radioactive contamination, is serious in "Parcel G". Is it preferred that waiting for consequences of breaching CERCLA 120 (h)(3)(C), beneath the required "covers" with foundation support piers, will be the expedient "Record of Decision" (?).	<p>If the property in Parcels D-1 and UC-1 are conveyed as an "early transfer" subject to the requirements of Section 120(h)(3)(C) of CERCLA, it is anticipated that the transferee will be responsible for constructing covers after transfer. The covers will be constructed to meet all the requirements of the remedial design, and will be conducted under the oversight of the regulatory agencies. The deed of transfer will contain any necessary interim land use restrictions required to protect covers following construction and comply with Section 120(h)(3)(C) of CERCLA.</p> <p>Please see the response to Comment Number 7 below for a discussion of foundation support piers.</p>
7 (item 1)	Construction related "covers", as well as foundation support piers where required through bay mud and fill, are out of compliance with "... land disturbing activity..." restriction ("Restricted Activities", a.) where this occurs following transfer.	Any construction-related covers or foundation support piers constructed after transfer will be constructed to be protective of human health and the environment, and will meet the requirements of the remedial design.
8 (item 2)	Construction related "alteration, disturbance, or removal..." is likely to be out of compliance where this may involve installation of public utilities for permanent structures, as required by construction activities which follow property transfer.	Any breaching or alteration of the cover post-transfer will be conducted in compliance with the Covenant(s) to Restrict Use of the Property, Quitclaim Deed(s), and the parcel-specific risk management plan, all of which will be reviewed and approved by the regulatory agencies.

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Proposed Plan for Parcel D, Hunters Point Shipyard		
Written Comments by Michael F. McGowan, Arc Ecology, received by email on August 25, 2008		
Comment Number	Comment	Response
1	On page 1 the proposed remedy for treating groundwater at Installation Sites IR-09, IR-33, and IR-71 is to use chemicals or biological nutrients to break down contaminants. These methods, zero valent iron (ZVI) treatment and bacterial enhancement, are effective under certain circumstances but are still considered experimental at Hunters Point Shipyard. Please document with a reference to a report or an explanation of the logic that supports the effectiveness of these treatments at the shipyard. If they are not as effective as hoped for, what does the Navy propose to do to remediate the groundwater, or will this problem be passed along to the new owners of the property?	Treatability studies using the proposed in situ biological and chemical treatment technologies have been conducted at other parcels with similar conditions and shown to be effective. Injection of ZVI was studied at Parcel B (Engineering/ Remediation Resources Group, Inc. and URS Corporation "Final Cost and Performance Report, Zero-Valent Iron Injection Treatability Study, Building 123, Parcel B, Hunters Point Shipyard" June 2004). Injection of a biological growth medium was studied at Parcel C (Shaw Environmental "Final In Situ Sequential Anaerobic-Aerobic Bioremediation Treatability Study, Remedial Unit C5, Building 134, Installation Restoration Site 25, Hunters Point Shipyard" November 2005).
2	Page 1 last paragraph states that the Navy will consider comments on the Proposed Plan when three Records of Decision (ROD) are prepared for the new sub-parcels within Parcel D. Please explain what opportunity will be provided for public input to the cleanup plans if members of the public are not satisfied with the responses to comments as presented in the RODs.	Members of the public may contact Mr. Keith Forman, the Navy Base Realignment and Closure Environmental Coordinator, directly (see page 16 of the Proposed Plan for contact information). Members of the public may also coordinate with community members of the Restoration Advisory Board (RAB) or attend the RAB meetings which are held on the fourth Thursday of every month (except November and December) and are open to the public (see page 15 of the Proposed Plan for more information about the RAB).
3	Page 6 last paragraph states that action is warranted for cumulative risk of cancer that exceeds a certain probability. Shouldn't that be incremental risk above a background? Please clarify.	Remedial action is proposed for areas where health risks exceed 1×10^{-06} (one in a million). For the evaluation of health risks from exposure to chemicals in soil, metals with measured concentrations that are less than Hunters Point ambient levels (HPAL) were not included in the calculation of health risks and identification of areas that require remedial action. The approach used in the human health risk assessment (HHRA) to address ambient levels of metals is described in Section 2.5.1 of the ROD for Parcels D-1 and UC-1.

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Written Comments by Michael F. McGowan, Arc Ecology, received by email on August 25, 2008		
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4	<p>The explanation of risk assessment and cleanup goals with respect to proposed reuse areas is confusing. For example, different exposure scenarios (concentration x time) were used for industrial than for residential. Was it assumed that industrial workers would be exposed fewer hours of the day than residents? What if an industrial worker was employed on Parcel D for 50 years while residents moved away every 5 years? What were the assumptions underlying these scenarios?</p>	<p>Tables B-4 through B-9 of the Final Revised Feasibility Study for Parcel D (SulTech 2007) summarize the exposure assumptions used in the HHRA to calculate health risks for residential, industrial, recreational, and construction worker exposure to chemicals in soil and groundwater at Parcel D. The exposure assumptions used in the HHRA are based on U.S. Environmental Protection Agency (EPA) and California Environmental Protection Agency (Cal/EPA) recommendations for evaluating reasonable maximum exposure, and were also based on agreement with the Base Realignment and Closure Cleanup Team (BCT).</p> <p>Multiple conservative exposure assumptions were combined in the HHRA so that the calculated health risks over-predict actual risks. The HHRA calculated health risks using assumptions for potential exposure that are specific to the planned reuse for each redevelopment block at Parcel D. For example, the planned reuse is industrial for redevelopment block 42. Therefore, the health risks for each of the exposure areas within this redevelopment block was calculated using assumptions for industrial exposure. Likewise, the preliminary remediation goals for this redevelopment block are protective for exposure during industrial use.</p> <p>As a conservative measure, the HHRA additionally evaluated residential, industrial, recreational, and construction worker risks for each exposure area throughout former Parcel D, regardless of the planned reuse. This approach was included to provide information on potential risks for all potential reuses, in the event that revisions are made to the Redevelopment Plan for HPS.</p> <p>The preferred alternative for soil at Parcels D-1 and UC-1 involves removal of soil in selected areas where chemicals exceed reuse-specific remediation goals and application of parcel-wide covers. The use of parcel-wide covers will eliminate the potential for contact with and health risks from exposure to chemicals in soil across all of former Parcel D.</p>

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5	Do the results of the different risk scenarios mean that the areas designated for industrial can be left more contaminated than those designated for residential?	Use of reuse-specific exposure scenarios for the HHRA (for example, industrial exposure for redevelopment block 42 at Parcel D-1) and for preliminary remediation goals results in different preliminary remediation goals for residential and industrial reuse areas. As noted in the response to comment 4, the use of parcel-wide covers will eliminate the potential for contact with and health risks from exposure to chemicals in soil across all of Parcel D, regardless of the remediation goals.
6	Will additional cleanup be required and who will be responsible if the future use of an area changes from industrial to residential?	Additional cleanup is not anticipated if future use changes. Covers will block exposure to soil, regardless of whether the exposure scenario is residential or industrial. However, the transferee would be responsible if changes in land reuse required changes in the remedy.
7	Page 7 second full paragraph states that the health risk assessments were based on reasonable exposure assumptions recommended by EPA and DTSC. What were these assumptions?	As stated in the response to comment 4, Tables B-4 through B-9 of the Final Revised Feasibility Study for Parcel D (SulTech 2007) summarize the exposure assumptions used in the HHRA to calculate health risks for residential, industrial, recreational, and construction worker exposure to chemicals in soil and groundwater at Parcel D. The exposure assumptions used in the HHRA are based on EPA and Cal/EPA recommendations for evaluating reasonable maximum exposure, and were also based on agreement with the BCT.
8	Page 7 next to last sentence says that the Remedial Action Objectives will be appropriate if the reuse plan is changed. However, the previous sentence says that the planned future land use was an important component in developing the RAOs. These two statements seem to conflict. Please explain.	The planned future land use was used to help develop the RAOs; however, the RAOs are carefully worded so that there is flexibility in whatever reuse is selected. Therefore, the RAOs presented in the proposed plan and associated RODs can be used for any reuse plan that the San Francisco Redevelopment Agency decides to implement prior to the ROD.
9	Page 14 Radiological Alternative R-2 next to last paragraph states that the Time Critical Removal Action is anticipated to achieve Remedial Action Objectives in the proposed plan. What if there is still residual radiation above the remediation goals? Will the radiation goals for industrial use areas present a problem if the use changes to residential?	Remediation will continue until the remediation goals for radionuclides are achieved. Remediation goals are not set separately for industrial areas. All areas will be cleaned to residential standards for radionuclides.

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10	<p>If radiological decontamination of all areas will result in free release, then the future reuse designations should not matter. If this is so, please state that all areas will be cleaned to "residential standards" with regard to radiological materials. The desire for residential standard cleanup is very strong in the local community.</p>	<p>The risk assessment for radionuclides used the residential exposure scenario to bound the risks to industrial workers or recreational users. All areas will be cleaned to residential standards for radionuclides.</p>

ATTACHMENT B. RESPONSIVENESS SUMMARY

REFERENCES

SulTech. 2007. "Final Revised Feasibility Study for Parcel D, Hunters Point Shipyard, San Francisco, California." November 30.

SulTech. 2008. "Final Radiological Addendum to the Revised Feasibility Study for Parcel D, Hunters Point Shipyard, San Francisco, California." April 11.