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**Public Summary: Draft Record of Decision for No Action at Parcel D-2
 Hunters Point Shipyard, San Francisco, California, August 29,
 2008**

The Department of the Navy (Navy) has prepared this draft record of decision (ROD) as the basis for the no action decision for Parcel D-2 at Hunters Point Shipyard in San Francisco, California.

The Navy has concluded no Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) action is necessary to ensure protection of human health or the environment at Parcel D-2. Current conditions at the site do not pose an unacceptable risk to human health or the environment for current or future uses of Parcel D-2. No covers or institutional controls will be required and no groundwater cleanup is needed for Parcel D-2. A 5-year review for Parcel D-2 will not be required because hazardous substances, pollutants, or contaminants will not remain on site above levels that allow for unlimited use and unrestricted exposure. The Navy, the U.S. Environmental Protection Agency (EPA), the California Environmental Protection Agency's Department of Toxic Substances Control (DTSC) and the San Francisco Bay Regional Water Quality Control Board (Water Board) jointly selected the no action decision for Parcel D-2.

Information Repositories: A complete copy of the "Draft Record of Decision for Parcel D-2" dated August 29, 2008, is available to community members at:

San Francisco Main Library
100 Larkin Street
Government Information Center, 5th Floor
San Francisco, CA 94102
Phone: (415) 557-4500

Anna E. Waden Bayview Library
5075 Third Street
San Francisco, CA 94124
Phone: (415) 715-4100

The report is also available to community members on request to the Navy. For more information about environmental investigation and cleanup at Hunters Point Shipyard, contact Sarah Koppel, remedial project manager for the Navy, at:

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Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310
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Draft

Record of Decision for No Action at Parcel D-2

**Hunters Point Shipyard
San Francisco, California**

August 29, 2008

Prepared by:

**Department of the Navy
Base Realignment and Closure
Program Management Office West
San Diego, California**

Prepared under:

**Naval Facilities Engineering Command
Contract Number N62473-07-D-3213
Contract Task Order 030**

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ACRONYMS AND ABBREVIATIONS

μCi	Microcurie
μg/kg	Micrograms per kilogram
μg/L	Micrograms per liter
§	Section
CDPH	California Department of Public Health
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DTSC	Department of Toxic Substances Control
EPA	U.S. Environmental Protection Agency
FFA	Federal Facility Agreement
FS	Feasibility Study
HPS	Hunters Point Shipyard
HRA	Historical Radiological Assessment
IR	Installation Restoration
mg/kg	Milligrams per kilogram
Navy	Department of the Navy
PQL	Practical quantitation limit
RAB	Restoration Advisory Board
RADIAC	Radiation Detection, Indication, and Computation
RESRAD-BUILD	Residual Radioactivity-Building
ROD	Record of Decision
SARA	Superfund Amendments and Reauthorization Act
SI	Site Inspection
TPH	Total petroleum hydrocarbon
TPHd	Total petroleum hydrocarbon as diesel
TRC	Technical review committee
UST	Underground storage tank
VOC	Volatile organic compound
Water Board	San Francisco Bay Regional Water Quality Control Board

1. DECLARATION

This Record of Decision (ROD) presents the basis for the no action decision for Parcel D-2 at Hunters Point Shipyard (HPS) in San Francisco, California. HPS was included on the National Priorities List in 1989 (U.S. Environmental Protection Agency [EPA] ID: CA1170090087). The remedy was selected in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986 (Title 42 *United States Code* Section 9601, et seq.) and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (Title 40 *Code of Federal Regulations* Part 300). This decision is based on information contained in the Administrative Record for the site. (A link to a site-specific Administrative Record Index will be provided in the draft final ROD.) Information not specifically summarized in this ROD or its references but that is contained in the Administrative Record¹ has been considered and is relevant to selection of the no action decision for Parcel D-2. Thus, the ROD is based on and relies on the entire Administrative Record file as support for the decision.

The Department of the Navy, EPA, and the California Environmental Protection Agency's Department of Toxic Substances Control (DTSC) and the San Francisco Bay Regional Water Quality Control Board (Water Board) jointly selected the no action decision for Parcel D-2. The Navy provides funding for site cleanups at HPS. The Federal Facility Agreement (FFA) for HPS documents how the Navy intends to meet and implement CERCLA in partnership with EPA, DTSC, and the Water Board.

The Navy originally divided HPS into six parcels (A through F) for environmental restoration. The Navy has now divided the original Parcel D into four new parcels: Parcel D-2, Parcel G, Parcel UC-1, and Parcel D-1.

Parcel D-2 was originally within the boundary of former Parcel A (the property directly north of Parcel D) and contains Building 813. A former underground storage tank (UST) site is also within the boundaries of Parcel D-2. (The UST was removed in 1991.) In 1995, the Navy and the regulatory agencies signed a ROD recommending no further action for Parcel A.

Beginning in 2002, a basewide Historical Radiological Assessment (HRA) was performed to identify any potential radiological contamination. The Navy used radiation detection instruments (which the Navy commonly refers to as Radiation Detection, Indication, and Computation instruments, or "RADIAC") to monitor levels and exposure to radiation at HPS. "Check sources" were available to check the proper operation of RADIACs in the field. These check sources were small, sealed sources of a certified quantity of radioactive material. A leaking 300-microcurie (μCi) strontium-90 check source was found in the Disaster Control Center inventory, and the Disaster Control Center was located in Building 813. The Navy concluded that spread of contamination from this source would be unlikely. However, the Navy

¹ **Blue text** identifies detailed site information available in the Administrative Record and listed in the References Table (Attachment A). This ROD is also available on CD whereby **blue text** serves as a hyperlink to reference information. The excerpts referenced by the hyperlinks are part of the ROD.

recommended further evaluation of potential radiological contamination at Building 813. The Navy therefore revised the southeastern boundary of Parcel A to exclude Building 813 so radiological surveys could be completed. The boundary revision resulted in the inclusion of Building 813 and surrounding paved areas within Parcel D. The Navy also recommended the removal of sanitary and storm sewers at Parcels B, C, D, E and E-2.

In 2007, the Navy surveyed Building 813 for radiological contamination and found no unacceptable risk was posed to human health or the environment. An unacceptable risk is defined as greater than 10^{-6} excess lifetime cancer risk or a segregated hazard index above 1 based on the incremental risk assessment developed in the Parcel D Feasibility Study and its Radiological Addendum. The California Department of Public Health (CDPH) conducted their own verification survey, and approved the Final Status Survey Report for Building 813 on April 1, 2008. EPA also issued a release letter. The Final Status Survey Report concluded that no radiological material at or above risk levels exists at or in the building.

The Navy has determined that there are no unacceptable risks from hazardous substances or radiological material at Parcel D-2. Therefore, a No Action ROD is appropriate for this parcel. No covers or institutional controls will be required and no groundwater cleanup is needed for Parcel D-2.

This ROD documents that no remedial action is necessary for Parcel D-2.

1.1 SELECTED REMEDY AND STATUTORY DETERMINATIONS

The Navy has concluded no CERCLA action is necessary to ensure protection of human health or the environment at Parcel D-2. Current conditions at the site do not pose an unacceptable risk to human health or the environment for current or future uses of Parcel D-2. A 5-year review for Parcel D-2 will not be required because hazardous substances, pollutants, or contaminants will not remain on site above levels that allow for unlimited use and unrestricted exposure.

1.2 AUTHORIZING SIGNATURES

Base Realignment and Closure Environmental Coordinator
Base Realignment and Closure Program Management Office West
Department of the Navy

Date

EPA, DTSC, and the Water Board concur:

Chief, Superfund Federal Facility and Site Cleanup Branch
U.S. Environmental Protection Agency

Date

Chief, Northern California Operations,
Office of Military Facilities
California Environmental Protection Agency
Department of Toxic Substances Control

Date

Executive Officer
California Environmental Protection Agency
San Francisco Bay Regional Water Quality Control Board

Date

2. DECISION SUMMARY

2.1 SITE DESCRIPTION AND HISTORY

HPS is located in southeastern San Francisco on a peninsula that extends east into San Francisco Bay (see [Figure 1](#)). HPS consists of 866 acres: 420 acres on land and 446 acres under water in the San Francisco Bay. In 1940, the Navy obtained ownership of HPS for shipbuilding, repair, and maintenance. After World War II, activities at HPS shifted to submarine maintenance and repair. HPS was also the site of the Naval Radiological Defense Laboratory from 1946-1969. HPS was deactivated in 1974 and remained relatively unused until 1976. Between 1976 and 1986, the Navy leased most of HPS to Triple A Machine Shop, Inc., a private ship repair company. In 1987, the Navy resumed occupancy of HPS.

HPS property was included on the National Priorities List in 1989, pursuant to CERCLA as amended by SARA, because past shipyard operations left hazardous substances on site. In 1991, HPS was designated for closure pursuant to the Defense Base Closure and Realignment Act of 1990. Closure at HPS involves conducting environmental remediation and making the property available for nondefense use.

The Navy has divided former Parcel D into four new parcels: Parcel D-2, Parcel G, Parcel UC-1, and Parcel D-1.

The original redevelopment plan developed by the San Francisco Redevelopment Agency divided Parcel D into redevelopment blocks, each with a specified reuse. Parcel D-2 was proposed for research and development reuse in the redevelopment plan. Parcel D-2 includes only Redevelopment Block A, which is not associated with any Installation Restoration (IR) site.

Parcel D-2₍₁₎, which includes Building 813 and the site of a former UST (see [Figure 2](#)), was originally part of Parcel A. Building 813 is a large warehouse that was used as offices, a supply storehouse, and the Disaster Control Center. During the research to support the HRA, documentation was found indicating a single leaking 300 μ Ci strontium-90 check source in the Disaster Control Center inventory. As a result, the Navy recommended further evaluation of potential radiological contamination at Building 813. Subsequently, in 2004, the southeastern boundary of Parcel A was revised to exclude Building 813 so it could be surveyed for potential radiological contamination. The boundary revision resulted in inclusion of Building 813 within Parcel D. After the Parcel A boundary had been revised, Parcel A was transferred to the City and County of San Francisco pursuant to a Finding of Suitability for Transfer.

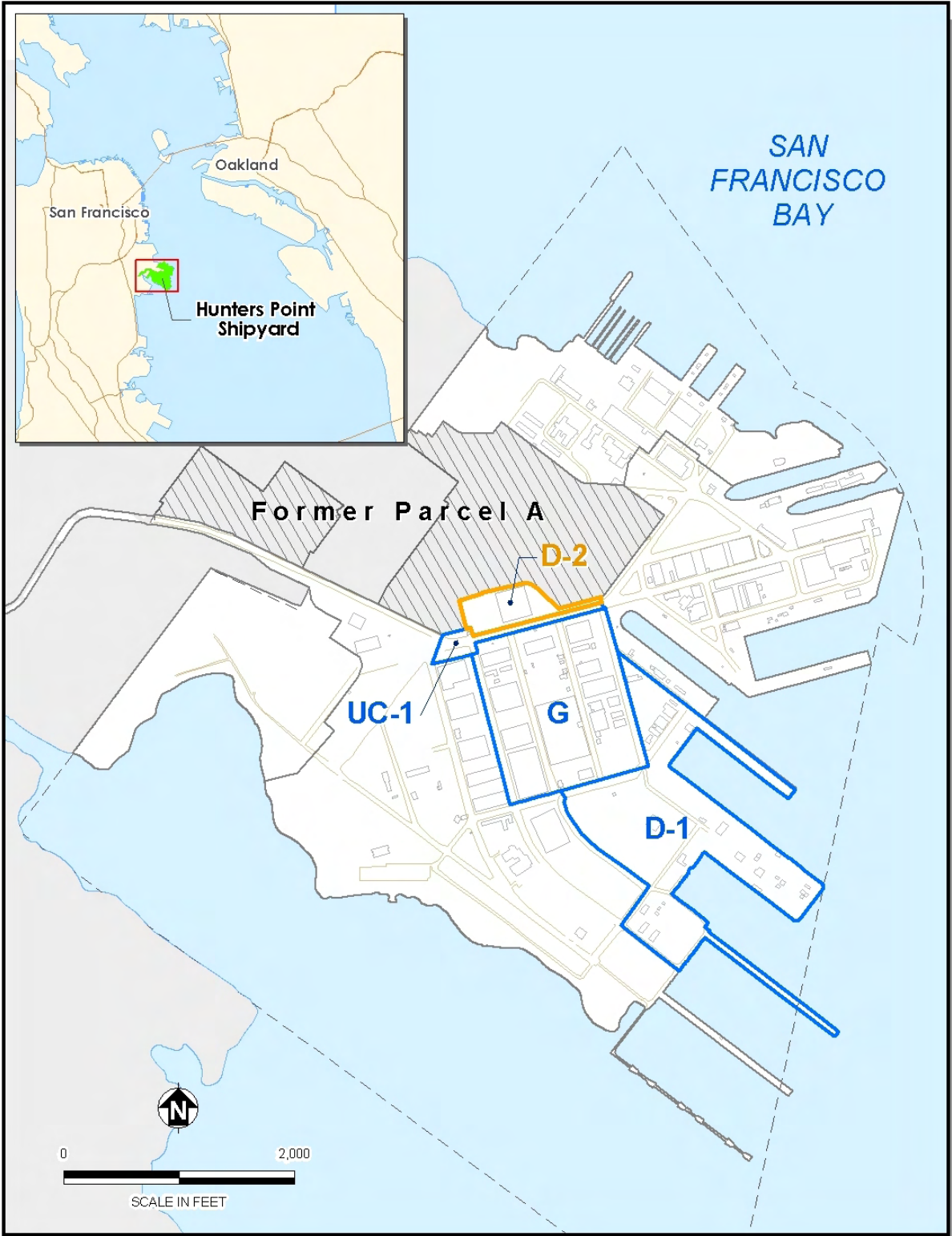


Figure 1. Facility Location Map

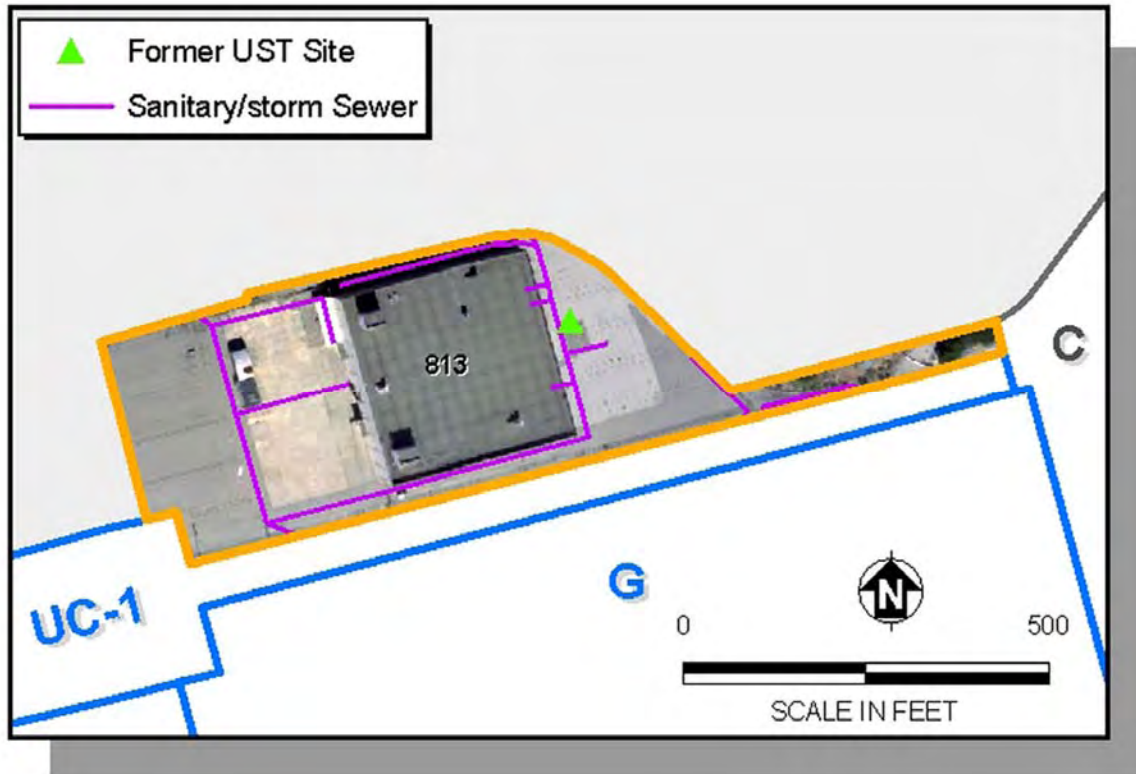


Figure 2. Parcel D-2 Site Features Map

2.2 SITE CHARACTERISTICS

Parcel D-2 consists of flat lowlands that are part of the original promontory of Franciscan bedrock that underlies HPS. Metals are naturally occurring in the minerals in the bedrock.

The **hydrogeologic setting**⁽²⁾ at Parcel D-2 consists of a bedrock water-bearing zone, with groundwater likely present in limited fractures. Groundwater is not currently used for any purpose at Parcel D-2. The **hydrostratigraphic units**⁽³⁾ present at Parcel D-2 are the same as at Parcel D: the A-aquifer, the aquitard zone, the B-aquifer, and a bedrock water-bearing zone. Groundwater beneath Parcel D-2 includes the shallow A-aquifer and the deeper B-aquifer; groundwater is not currently used for any purpose at Parcel D-2. Groundwater in the A-aquifer is not suitable as a potential source of drinking water. Groundwater in the B-aquifer has a low potential as a future source of drinking water.

Parcel D-2 ecology is limited to plant and animal species adapted to the industrial environment. Parcel D-2 is covered with Building 813 and surrounding pavement (see Figure 2). Viable terrestrial habitat is inhibited at Parcel D-2 because the ground surface is paved or covered by structures. No threatened or endangered species are known to inhabit Parcel D-2 or its immediate vicinity.

2.3 PREVIOUS INVESTIGATIONS

In 1993, the Navy performed a Site Inspection (SI) to evaluate potential contamination at Parcel A. Building 813 was investigated, and an **inventory**⁽⁴⁾ of the building was prepared to identify any potential sources of contamination. No sources of contamination inside the building were identified at that time. An UST was located adjacent to Building 813. The UST was installed in 1976 and was used to store fuel oil for a boiler in Building 813. In 1991, the UST was **removed**⁽⁵⁾, the site was **backfilled and paved**⁽⁶⁾, and soil and groundwater samples were collected for chemical analysis. The 1991 analytical **results**⁽⁷⁾ showed that concentrations of metals were below the interim ambient levels. One soil sample contained a semivolatile organic compound (phenanthrene at 190 micrograms per kilogram [$\mu\text{g}/\text{kg}$]). The only volatile organic compound (VOC) detected was total xylene at 5 $\mu\text{g}/\text{kg}$. Diesel was the only total petroleum hydrocarbon (TPH) compound detected in the soil samples. One sample from the UST excavation contained TPH as diesel (TPHd) at 14 milligrams per kilogram (mg/kg). The product pipe samples contained TPHd at levels ranging from 18 to 32 mg/kg.

Seven VOCs (benzene, 1,2-dichloroethane, 1,1-dichloroethene; tetrachloroethene, 1,1,1-trichloroethane, trichloroethene, and toluene) each quantified at estimated values less than or equal to 6 micrograms per liter ($\mu\text{g}/\text{L}$) and below the laboratory practical quantitation limits (PQL) were submitted to EPA, DTSC and the Water Board. In 1993, and in response to **regulatory agency concerns**⁽⁸⁾, the Navy conducted an additional groundwater investigation. VOCs were not detected in any of the groundwater samples at or above the PQL of 10 $\mu\text{g}/\text{L}$. With the exception of acetone, no VOCs were detected above the method detection limit; the acetone detection was later determined to be a result of laboratory contamination. The Navy therefore concluded that no further evaluation of the groundwater was necessary.

Based on the SI and the subsequent groundwater results, the area that is now Parcel D-2 (Building 813 and the area immediately surrounding it) did not qualify to be included in the Remediation Investigation. In 1995, a No Action ROD was signed for Parcel A, which included this area at the time (see [Table 1](#)).

In 2004, the Navy completed a **basewide HRA**⁽⁹⁾. During the HRA, documentation that indicated a leaking 300 μCi strontium-90 check source was located in the Disaster Control Center inventory. The Disaster Control Center was centrally located on the first floor in Building 813. As a result, the Navy recommended further evaluation of **potential radiological contamination**⁽¹⁰⁾ at Building 813. Subsequently, the southeastern **boundary**⁽¹¹⁾ of Parcel A was revised to exclude Building 813 so it could be surveyed for potential radiological contamination. As a result of the boundary revision, Building 813 was included within Parcel D.

In 2007, the Navy surveyed Building 813 to determine whether strontium-90 or other radionuclides were a concern at Building 813. Survey results concluded Building 813 could be **released**⁽¹²⁾ from radiological control pending regulatory agency approval. CDPH reviewed all documentation on the radiological issues at Building 813 and on April 1, 2008, concurred that no action was required and that the site was acceptable for **unrestricted use**⁽¹³⁾.

In 2007, the Navy completed the removal of sanitary and storm sewers. The Navy has developed the survey reports that show that all areas of Parcel D-2 meet the risk criteria for release.

Table 1. Previous Investigations and Removal Actions

Previous Investigation/ Removal Action*	Date	Investigation/Removal Action Activities
Parcel A Site Inspection	1993	Evaluated whether contamination was present and whether a release to the environment had occurred, evaluated each site for inclusion in the Navy's IR program, and eliminated sites that posed no significant threats to public health or the environment. The UST within Parcel D-2 was removed, backfilled, and paved, and soil and groundwater samples were collected for chemical analysis.
Draft Report of Results for Work Plan Addendum No. 4, Parcel A Site Inspection Report	1993	Additional groundwater samples were collected to further characterize the extent of VOCs in groundwater. All results demonstrated VOCs are not present.
Parcel A Record of Decision	1995	Describes the NFA remedy selected for Parcel A, including Parcel D-2.
Historical Radiological Assessment	2004	Evaluated and designated sites as impacted or non-impacted. An impacted site is one that has the potential for radioactive contamination based on historical information or is known to contain or have contained radioactive contamination. A non-impacted site is one, based on historical documentation or results of previous radiological survey information, where there is no reasonable possibility for residual radioactive contamination. Based on the results of the assessment, Building 813 within Parcel D-2 was identified as impacted.
Parcel A Finding of Suitability for Transfer	2004	Documents the transfer of Parcel A to the City and County of San Francisco and the exclusion of Parcel D-2 from Parcel A.
Final Status Survey Report, Building 813	2007	Scoping survey performed for Building 813 to evaluate whether contamination existed on the first floor of Building 813. Floors and walls were surveyed and swipe samples were collected to evaluate the potential presence of radiation at static reading locations. This report received regulatory agency approval that no further action was required.
Final Radiological Addendum for the Feasibility Study for Parcel D	2008	Evaluated radiological risk at Parcel D, including Building 813. States that Building 813 has been surveyed for release from radiological control pending regulatory agency approval.
Final Survey Unit Project Reports for Survey Units 31, 32, 34, 35 and 38, Sanitary Sewer and Storm Drain Removal Project	2008	Documents that the identified residual radioactivity levels inside the excavated sanitary and storm sewer trench areas and within the import soils used as backfill met the release criteria.
Proposed Plan for Parcel D	2008	Proposed Plan invited the public to review and comment on the Preferred Alternatives for addressing environmental contamination at Parcel D before the final remedy selection.

Note:

* The documents listed are available in the Administrative Record and provide detailed information used to support remedy selection at Parcel D-2.

2.4 CURRENT AND POTENTIAL FUTURE SITE USES

Currently, Building 813 is not used. The building and all of Parcel D-2 were proposed for research and development reuse. The **groundwater**⁽¹⁴⁾ at Parcel D-2 is not considered suitable for drinking water, based on the insignificant and nonsustainable quantities of water in areas where groundwater was detected.

2.5 SUMMARY OF SITE RISKS

Risk⁽¹⁵⁾ to human health from exposure to chemicals in soil and groundwater was not evaluated for Parcel D-2 because no source of chemical contamination was identified.

The only potential source of radiological contamination at Parcel D-2 was from strontium-90 detected in a device that may have been stored inside Building 813 (see **Figure 3**). Exposure to contaminants in soil and groundwater was not evaluated because the only source of the potential radiological contamination was located within Building 813.

2.5.1 Human Health Risk Evaluation

Based on a human health **conceptual site model**⁽¹⁶⁾, **radiological risk**⁽¹⁷⁾ to human health from exposure to Building 813 was evaluated. The potential source of contamination was from a device determined to be a leaking check source of strontium-90 that may have been stored within Building 813. Check sources were small, sealed sources of a certified quantity of radioactive material. A cabinet was identified during a walkthrough of the building bearing a radioactive materials placard. Since the origin of the cabinet was unknown, it was concluded that additional radioisotopes could be present in the building. Therefore, the risk assessment evaluated the potential for additional radioisotopes, including radium-226.

Residual Radioactivity-Building (**RESRAD-BUILD**)⁽¹⁸⁾ was used to calculate doses and model risks for Building 813 and to analyze the exposure scenarios that matched the planned reuse of Parcel D-2. This planned reuse could include occupied mixed-use dwellings; as a result, the risk assessment evaluated a residential exposure scenario. To simplify the RESRAD-BUILD evaluation, it was assumed materials used to construct Building 813 would contain naturally occurring elevated levels of radioactivity. Typically, no background radioactivity is associated with building materials, except for building material made from earthen media (such as tiles, concrete, stone, and so forth). Based on the results of RESRAD-BUILD using a residential exposure scenario, the radiological risk at Building 813 was 2.77×10^{-7} and the dose was 0.69 millirem per year. The RESRAD results for the sewers was less than 1 millirem per year. These dose results are well below the 15 millirem standard that EPA recommends for Superfund cleanups.

The background concentration of strontium-90 was assumed to be zero (that is, zero disintegrations per minute/100 square centimeters) to estimate the total risk at Building 813. This assumption is reasonable because strontium-90 is not found in building materials.

However, as a very conservative modeling measure, the background concentration of radium-226 in building materials is also assumed to be zero. The **total radiological risk**⁽¹⁹⁾ to human health from exposure to Building 813 was calculated to be 2.77×10^{-7} .

Based on the results of RESRAD-BUILD and risk calculations, no unacceptable risk associated with radiological contamination was found in Building 813 or remains at the former sanitary and storm sewers.

The Radiological Addendum specifies the **assumptions and uncertainties**⁽²⁰⁾ inherent in the risk assessment process because of the input parameters and exposure pathways.

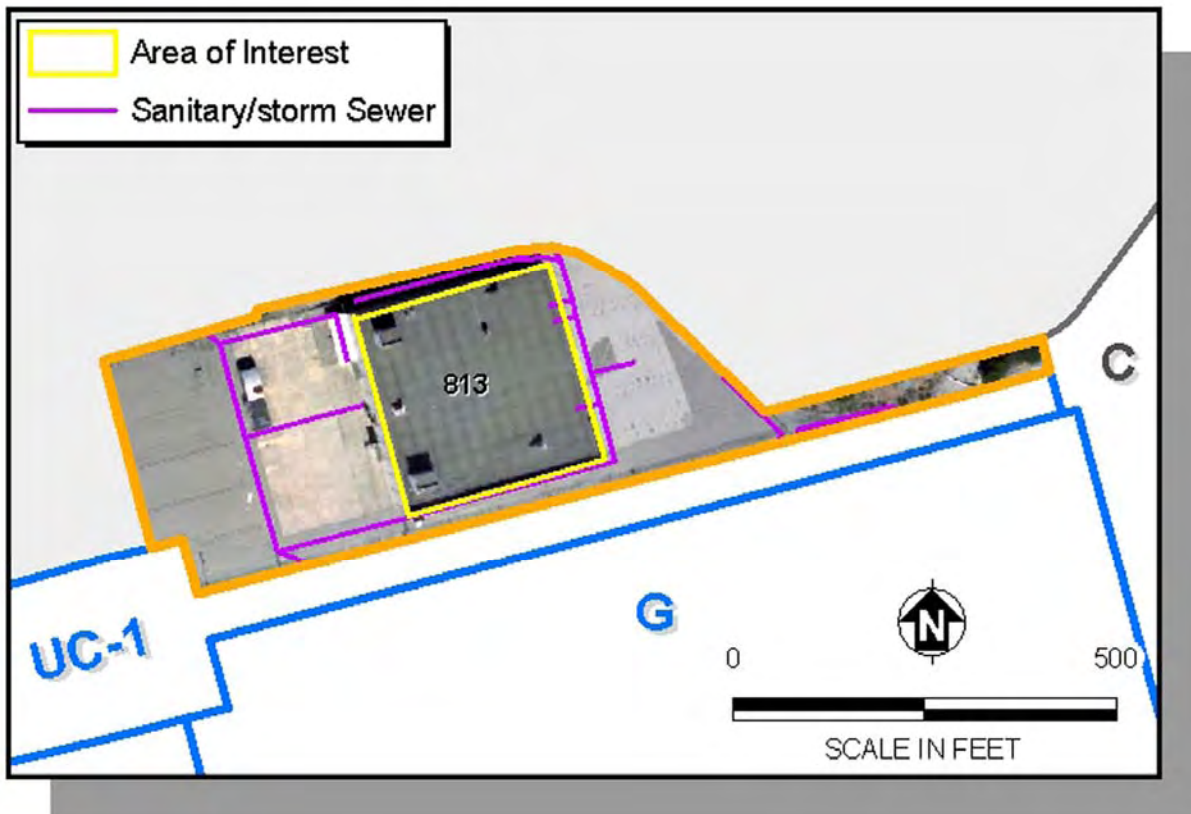


Figure 3. Site Potentially Contaminated by Radionuclides

2.5.2 Ecological Risk Assessment

An [ecological risk assessment](#)⁽²¹⁾ was conducted for Parcel A, which originally included Parcel D-2, in 1994. No significant exposure routes were identified and risk to terrestrial species was determined to be minimal because most of Parcel A was developed or covered with manmade structures. As a result, no action was recommended to address ecological risk at Parcel A, including Parcel D-2.

2.6 COMMUNITY PARTICIPATION

Community participation at HPS includes a Restoration Advisory Board (RAB), public meetings, public information repositories, newsletters and fact sheets, public notices, and an IR Program website. The Community Involvement Plan for HPS provides detailed information on community participation for the IR Program and documents interests, issues, and concerns raised by the community about the ongoing investigation and cleanup at HPS.

In the late 1980s, the Navy formed a technical review committee (TRC) consisting of the Navy, community members, and regulatory agency representatives. The TRC met to discuss environmental issues pertaining to HPS. In 1993, pursuant to the Defense Environmental Restoration Program, Title 10 *United States Code* § 2705(d), the Navy formed the RAB, which replaced the TRC. The RAB consists of members of the Navy, the community, and the regulatory agencies. The RAB meetings are held on the fourth Thursday of every month and are open to the public to provide opportunity for comment and input. Documents and relevant information relied on in the remedy selection process will be made available for public review in the public information repositories listed below or on the [IR Program website](#)⁽²²⁾.

San Francisco Main Library
100 Larkin Street
Government Information Center, 5th Floor
San Francisco, California 94102
Phone: (415) 557-4500

Anne E. Waden Bayview Library
5075 Third Street
San Francisco, California 94124
Phone: (415) 715-4100

For access to the Administrative Record or additional information on the IR Program contact:

Mr. Keith Forman
Hunters Point Shipyard BRAC Environmental Coordinator
Base Realignment and Closure Program Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310
Phone: (619) 532-0913
e-mail: keith.s.forman@navy.mil

In accordance with CERCLA §§ 113 and 177, the Navy provided a public comment period from August 7, 1995, through September 5, 1995, for Parcel A, which included the area now identified as Parcel D-2. A public meeting was held on August 22, 1995, where the basis for no further action at Parcel A was presented. A transcript of the public meeting is available to the public at the information repositories. In addition, the Navy provided a public comment period from July 23, 2008, to August 22, 2008, for the proposed remedial action described in the Proposed Plan for Parcel D, which provides the basis for the remedies at Parcels D-1, D-2, G, and UC-1. A public meeting to present the Proposed Plan was held at 6:30 p.m. on July 30, 2008. During the public meeting, the Navy discussed the No Action ROD planned for Parcel D-2. Public notice of the meeting and availability of documents appeared in the *San Francisco Examiner* on July 27, 2008.

3. RESPONSIVENESS SUMMARY

The responsiveness summary provides the Navy's responses to questions raised during the public comment period. The Navy requested comments on the Parcel D Proposed Plan, which included Parcel D-2, in mailed copies of the Proposed Plan and during a public meeting. The participants in the public meeting, held on July 30, 2008, included members of the community, RAB members and representatives of the Navy, EPA, DTSC, and the Water Board. Questions and concerns received during the meeting were addressed at the meeting and are documented in the [meeting transcript](#). During the meeting and the July 23 to August 22, 2008 comment period, no general or specific comments were received by the Navy, EPA, DTSC or the Water Board that were applicable to Parcel D-2. The Navy did receive general and specific comments that were applicable to Parcels D-1, G and UC-1. The ROD for Parcel G and the combined ROD for Parcels D-1 and UC-1 will include responses to those comments.

[Links for the index of the administrative record file and transcript of meeting to be provided in the draft final ROD].