



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

AR_N00217_000480
HUNTERS POINT
SSIC NO. 5090.3.A

5090
Ser 06CH.RM/0726
July 17, 2001

Ms. Claire Trombadore (SFD 8-3)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Mr. Chein Kao
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Mr. Brad Job
California Regional Water Quality Control Board, San Francisco Bay Region
1515 Clay Street, #1400
Oakland, CA 94612

Dear BCT Members:

This letter provides the Navy's revisions to its June 20, 2001, proposal to resolve the informal dispute regarding manganese on Parcel B, Hunters Point Shipyard (HPS). The revised proposal below is the complete Navy proposal on this matter taking into account and addressing all comments received from the U.S. Environmental Protection Agency (EPA) on June 26, 2001, and the Department of Toxic Substances Control (DTSC) on June 27, 2001. Enclosures (1) through (3) are also provided to supplement the information presented in this proposal. Please review this proposal and provide comments or concurrence letter to me by July 24, 2001.

Following is the Navy's revised approach to address the remaining 18 manganese only sites on Parcel B.

1. The following 13 excavation areas have a weighted average concentration of less than 1,400 milligrams per kilogram (mg/kg): 10-1, 10-5, 20-1, 24-1, 24-6, 24-8, 24-9, 60-1, B2727, B3425, B3622, B3914, and B3921, as indicated on figures in enclosure (1). Enclosure (2) provides sample ID, sample type, depth, and concentration. These weighted averages are based on all sample results collected to date, which have not been removed through previous Remedial Action (RA) activities. Both discrete and composite samples were used in calculating the averages. Composite samples were weighted according to the number of aliquots comprising them (i.e., a 3-point sidewall composite was assigned a factor of 3, and a 5-point bottom composite was assigned a factor of 5). Enclosure (2) also shows the weighting factors used for each sample. Enclosure (3) provides a summary overview of all 18

excavation sites including the area of each site.

Spatial characterization per the Remedial Design (RD) is complete for Excavations 23-2, 24-6, 24-9, B2727, and B3914. While the other eight sites do not meet the exact RD step-out requirements, there are sufficient samples per each site to define these as "well characterized" sites. This approach would be consistent with that used during the Remedial Investigation (RI) on a site-by-site basis. Therefore, additional samples in these locations are not warranted, nor proposed.

Only two sites exceeded 2,500 square feet in area, Excavations 20-1 and 24-1. Reviewing the average concentrations for a maximum area of 2,500 square feet had no impact on the analyses.

The EPA commented specifically on Excavation B2727. Excavation B2727 is a manganese only excavation with no other COPCs. A test pit excavation adjacent to B2727 identified chert and basalt bearing fill. Manganese is completely bounded according to the RD by 10 samples with only 1 exceedance of 1,920 mg/kg at 8.75 feet below ground surface (bgs). A co-located sample yielded a concentration of 821 mg/kg and no other sample exceeds 950 mg/kg. Its weighted average concentration of 874.3 mg/kg is less than 1,400 mg/kg. Although the excavations total area is quite small, approximately 64 square feet, numerous utilities intersect or run adjacent to the excavation, which would significantly complicate the remedial action.

There are no other chemicals of concern (COC) for any of these areas. Further, there are no industrial sources of manganese in any of these areas. Based on these findings, the Navy proposes no additional excavation for these 13 areas.

The remedial design (RD) will be amended with the sample text below to address this average concentration concept. All of the sample results for the areas will be further explained and justified in the construction summary report (CSR) and the RA closeout report (RA report).

2. Only five sites exceed a weighted average concentration of 1,400 mg/kg: 10-2, B3229, 23-2, B3718, and B4217, as indicated on figures in enclosure (1).
3. Excavation area 10-2 has an average concentration of 5,379 mg/kg due to a RI sample from 1989, which yielded a result of 41,400 mg/kg. The Navy took a co-located sample in 2000 to try to verify this result. The sample was collected at a location 12 inches to the east and 6 inches above the previous RI sample location. This is the closest the co-located sample could be collected to the RI sample. This result was 440 mg/kg. Had the 41,400 mg/kg sample result been indicative of an

industrial release, the co-located sample would have yielded a much higher result. Additionally, there are four additional samples located within four feet of the RI sample, which all yield results between 309 and 819 mg/kg. The average concentration for the site using the co-located result instead of the RI result yields an average concentration of 586 mg/kg. This area is completely bounded according to the spatial requirements of the RD. Additionally, as this is an active soil vapor extraction (SVE) treatment area for volatile organic compounds (VOCs), further complicates excavation activities. Excavation would disrupt the active treatment systems and could result in creating a pathway for contaminants to migrate from the soil to the air inside Building 123. Arsenic was also a COPC at this site due to a RI sample result of 11.7 mg/kg, but this is within the natural variations of the ambient concentrations, and is only slightly above the Hunters Point Ambient Level (HPAL) of 11.2 mg/kg. Eight other arsenic results at this excavation site are less than 3.5 mg/kg, providing an average arsenic concentration of 3.6 mg/kg. Excavation 10-2 is under Building 123, which is integral to the City's reuse plan. Excavation would require either partial demolition of Building 123 and/or construction of temporary structural supports to prevent compromising the roof of Building 123. Based on this information, the Navy recommends no excavation for this area. As discussed above, all of this information will be documented in the CSR and RA report.

4. Excavation B3229 is a manganese only excavation with no other COPCs. The average concentration for this site is 1,565 mg/kg. If the single highest exceedance of 8,500 at 5.25 feet bgs were removed, the resulting average concentration would be 1,031 mg/kg. Excavation is complicated by the nearby presence of a major support pole inside Building 113. Temporary structural supports and foundation restoration would be required. There is a potential that the excavation could damage the nearby building side, requiring further demolition. The Navy will collect four additional samples to supplement spatial characterization per the RD and reevaluate the average manganese concentration and spatial distribution. The Navy will likely recommend no further action for this area, either based on the revised weighted average concentration, or due to site-specific constraints to excavation.
5. Excavation 23-2 had manganese and beryllium as COPCs. Beryllium was delineated and excavated during the 1998-1999 RA. The 28 manganese samples with 7 exceedances generate a weighted average concentration of 1,875 mg/kg solely due to a 3-point sidewall composite of 9,500 mg/kg, as indicated on the figure in enclosure (1). Removal of this sample from the calculation results in a weighted average of 1,221 mg/kg. No additional sampling is required to complete the RD spatial characterization of the south sidewall. The Navy proposes completing the excavation to the first stepout on the south wall, lowering the average concentration below 1,400 mg/kg, and backfilling. The Navy recommends no further characterization or action for the other portions of this excavation.

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6. For Excavations B3718, and B4217, the Navy will complete sampling in these areas to meet the RD sampling design spatial criteria, as indicated on the figures in enclosure (1). If the weighted average concentration with these additional samples yields a weighted average concentration less than 1,400 mg/kg, the Navy proposes no further action for these sites. If however the weighted average concentration is greater than the 1,400 mg/kg, the Navy will perform additional excavation around the areas where the manganese concentrations are driving the average concentration above 1,400 mg/kg until the weighted average concentration calculated for the site is less than 1,400 mg/kg.
7. All of the sites mentioned above will be documented in the CSR and RA.

The proposal outlined above will meet the intent of the Parcel B ROD, and will therefore not require an Explanation of Significant Differences (ESD) or any additional land use controls for the site. If this is acceptable, the Navy proposes the following potential language as an amendment to the Parcel B RD: *"Manganese only sites will be delineated and remediated to yield an average concentration of less than the Parcel B ROD cleanup goal of 1,400 mg/kg."*

Should you have any concerns with this matter, please contact me at (619) 532-0913.

Sincerely,



RICHARD G. MACH JR., P.E.
BRAC Environmental Coordinator
By direction of the Commander

- Enclosures:
1. Revised Figures for the 18 Parcel B Manganese Sites, July 16, 2001
 2. Table 1, Summary of Manganese Data Used to Complete the Weighted Average Calculations, July 17, 2001
 3. Table 2, Summary of Manganese Only Excavations, July 17, 2001

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ENCLOSURE 1

REVISED FIGURES FOR THE 18 PARCEL B
MANGANESE SITES

DATED 16 JULY 2001

THIS ENCLOSURE WAS NOT SUBMITTED TO THE
RESTORATION RECORD FILE.

FOR ADDITIONAL INFORMATION, CONTACT:

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ENCLOSURE 2

TABLE 1, SUMMARY OF MANGANESE DATA USED TO
COMPLETE THE WEIGHTED AVERAGE CALCULATIONS

DATED 17 JULY 2001

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ENCLOSURE 3

TABLE 2, SUMMARY OF ONLY EXCAVATIONS

DATED 17 JULY 2001

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RESTORATION RECORD FILE.

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