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HUNTERS POINT
SSIC NO. 5090.3

IN REPLY REFER TO:

5090.1E
Ser 622/L117-1
27 Apr. 1999

By Facsimile (415) 744-1916

Ms. Claire Trombadore and Ms. Sheryl Lauth
U. S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Trombadore and Ms. Lauth:

This is in response to various comments regarding our request for schedule revisions including your letter of April 1, 1999, DTSC and RWQCB letters and our April 13, 1999 meeting.

The April 13, 1999 meeting helped to clarify the Navy's proposed schedule revisions and the agencies' concerns. The Navy believes that the basic rationale and approach for resolving the issues as stated in the letter of March 25, 1999 are still appropriate. The formation of a groundwater operable unit for Hunters Point Shipyard is the most appropriate way to address the issues of: classification of groundwater as a drinking water aquifer; the potential need for additional characterization of the B-aquifer; the interconnections of the A and B-aquifers; and the potential degradation of the water quality in the B-aquifer. All of these issues are common to the groundwater in the remaining Hunters Point Parcels and are best handled in one operable unit. We intend to proceed with one operable unit for groundwater.

We have made several changes in the proposed schedules based upon the agencies' letters and the April 13, 1999 meeting.

For Parcel F the Navy agrees that a meeting with staff and managers is necessary as soon as possible. Pending the outcome of that meeting the Navy has not modified the Parcel F schedule.

The Parcel D schedule was modified to include the tech memo on risk management. Pending the outcome of the proposed BCT meeting on Parcel D data gaps including organotin and PCBs at IR-8, the schedule still includes data gaps work. This work will address those issues that the BCT has commented on in the RI and FS documents for Parcel D and in the Parcel D risk management meeting. As was stated in the meeting of April 13, 1999 the Navy maintains that this data gap work is necessary to adequately resolve uncertainties that may occur in developing the RODs. If all BCT

members agree that data gaps work is not necessary for Parcel D, the Navy will delete this requirement.

The Parcel C schedule was changed because the Parcel C data gaps relate to groundwater contaminants and will be addressed under the Groundwater OU. This change also addresses the RWQCB issue on separation of the C and D schedules. As a part of our revised approach to the cleanup, the Navy is planning to rerun the Human Health Risk Assessment for Parcel C using current guidance in addition to applying the Risk Management techniques developed in Parcel D. As a result, the submission date for the draft addendum to the Draft Final FS changed very little.

The Parcel E schedule is unchanged. The schedule does include rerunning the HHRA for Parcel E as well as applying the Risk Management techniques developed in Parcel D.

In Parcel B we have added the requested milestones and submittals.

We have discussed the new work plans and reports included in our schedules at the April 13, 1999 meeting. The new work will be similar to previous work on sampling and does not require a detailed work breakdown structure to estimate time needed for completion.

It is the Navy's intent that by working together we can reach consensus and avoid having to move to the formal dispute process.

If additional information is needed, please contact me, at (650) 244-3048.

Sincerely,



Michael McClelland
BRAC Environmental Coordinator
Hunters Point Shipyard

Encl: HPS FFA Schedules

Copy to:

California Environmental Protection Agency, DTSC (Attn: Mr. Chein Kao)
Regional Water Quality Control Board (Attn: Mr. David Leland)
SOUTHWESTNAVFACENGCOM (Attn: Mr. Walt Sandza)

SCHEDULE: PARCEL B

<u>Document</u>	<u>Deadline</u>	<u>Estimated Dates</u>
Draft Final RD	3/25/99	--
Draft Final RA Work Plan	4/29/99	--
Draft Quitclaim Deed with Environmental Restrictions	4/13/99	--
Draft Final Quitclaim Deed	7/13/99	--
Draft Construction Summary Report	09/30/99	--
Draft Final Construction Summary Report	12/30/99	--
Draft Remedial Action Report	02/30/00	--
Draft Final Remedial Action Report	05/30/00	--

SCHEDULE: PARCEL C

<u>Document</u>	<u>Deadline</u>	<u>Estimated Dates</u>
Draft Addendum to Draft Final FS	2/20/00	--
Draft Final Addendum to Draft Final FS*	5/20/00	--
Draft Proposed Plan (for agency review)	90 days after submittal of Draft Final FS Addendum	08/20/00
Draft Final Proposed Plan* (to Agencies and Public)	30 days after submittal of the Draft Proposed Plan	09/20/00
Final Proposed Plan Published	15 days after Draft Final Proposed Plan submitted to agencies	10/05/00
Start of Public Comment Period on Proposed Plan	5 days after publication of Proposed Plan	10/11/00
Draft Record of Decision (ROD)+	11/15/00 (12/15/00)**	--
Draft Final ROD*	90 days after submittal of Draft ROD	2/16/01 (3/15/01)**
Final ROD Approval	30 days after submittal of Draft Final ROD	3/16/01 (4/14/01)**
Commence Remedial Action	Within 15 Months of Final ROD approval	6/16/02 (7/16/02)**

* Primary document (subject to Dispute Resolution Procedures)

+ Includes responsiveness summary and schedules for draft remedial design, completion of construction, Draft remedial action, public operations plan, and commencement of the remedial action.

** 30 days after start of public comment period. May be extended to 60 days if review extension for Proposed Plan requested (see revised deadline in parentheses).

SCHEDULE: PARCEL D

<u>Document</u>	<u>Deadline</u>	<u>Estimated Dates</u>
Draft Risk management Tech Memo	6/21/99	--
Draft Final Risk Management Tech Memo	90 days after submittal of the Draft Tech Memo	9/21/99
Draft Data Gaps Work Plan	60 days after data gaps meeting	7/13/99
Draft Final Data Gaps Work Plan	90 days after submittal of Draft Work Plan	10/13/99
Draft Addendum to Draft Final FS	4/20/00	--
Draft Final Addendum to Draft Final FS*	7/20/00	--
Draft Proposed Plan (for agency review)	90 days after submittal of Draft Final FS Addendum	10/20/00
Draft Final Proposed Plan* (to Agencies and Public)	30 days after submittal of the Draft Proposed Plan	11/20/00
Final Proposed Plan Published	15 days after Draft Final Proposed Plan submitted to agencies	12/05/00
Start of Public Comment Period on Proposed Plan	5 days after publication of Proposed Plan	12/11/00
Draft Record of Decision (ROD)+	1/15/01 (2/15/01)**	--
Draft Final ROD*	90 days after submittal of Draft ROD	4/16/01 (5/15/01)**
Final ROD Approval	30 days after submittal of Final ROD	5/16/01 (6/14/01)**
Commence Remedial Action	Within 15 Months of Final ROD approval	8/16/02 (9/16/02)**

* Primary document (subject to Dispute Resolution Procedures)

+ Includes responsiveness summary and schedules for draft remedial design, completion of construction, Draft remedial action, public operations plan, and commencement of the remedial action.

** 30 days after start of public comment period. May be extended to 60 days if review extension for Proposed Plan requested (see revised deadline in parentheses).

SCHEDULE: PARCEL E

<u>Document</u>	<u>Deadline</u>	<u>Estimated Dates</u>
Draft Final Data Gaps Work Plan Completed	4/26/99	--
Draft Ecological Risk Assessment (ERA) Validation Study Report	6/14/99	--
Cleanup Level Technical Memorandum	6/14/99	--
Finalize Target Cleanup Levels	8/4/99	--
Draft Final ERA Validation Study Report	9/13/99	--
Draft Final FS Report*	150 days after finalize target cleanup levels	1/10/00
Draft Proposed Plan (for agency review)	90 days after submittal of Draft Final FS Report	4/10/00
Draft Final Proposed Plan* (to Agencies and Public)	30 days after submittal of the Draft Proposed Plan	5/10/00
Final Proposed Plan Published	15 days after Draft Final Proposed Plan submitted to agencies	5/25/00
Start of Public Comment Period on Proposed Plan	5 days after publication of Proposed Plan	5/30/00
Draft Record of Decision (ROD)+	7/31/00 (8/30/00)**	--
Draft Final ROD*	90 days after submittal of Draft ROD	10/30/00 (11/30/00)**
Final ROD Approval	30 days after submittal of Draft Final ROD	11/30/00 (1/2/01)**
Commence Remedial Action	Within 15 Months of Final ROD approval	3/4/02 (4/1/02)**

* Primary document (subject to Dispute Resolution Procedures)

+ Includes responsiveness summary and schedules for draft remedial design, completion of construction, Draft remedial action, public operations plan, and commencement of the remedial action.

** 30 days after start of public comment period. May be extended to 60 days if review extension for Proposed Plan requested (see revised deadline in parentheses).

SCHEDULE: PARCEL F

<u>Document</u>	<u>Deadline</u>	<u>Estimated Dates</u>
Draft Ecological Risk Assessment (ERA) Workplan	6/17/99	--
Draft Final ERA Workplan	9/16/99	--
Draft RI Report	6/13/00	--
Draft Final RI Report	10/17/00	
Draft FS Workplan	8/2/99	--
Draft Final FS Workplan	11/23/99	--
Draft FS Report*	9/6/00	--
Draft Final FS Report*	135 days after submittal of Draft FS Report	1/19/01
Draft Proposed Plan (for agency review)	90 days after submittal of Draft Final FS Report	4/19/01
Draft Final Proposed Plan* (to Agencies and Public)	30 days after submittal of the Draft Proposed Plan	5/21/01
Final Proposed Plan Published	15 days after Draft Final Proposed Plan submitted to agencies	6/5/01
Start of Public Comment Period on Proposed Plan	5 days after publication of Proposed Plan	6/11/01
Draft Record of Decision (ROD)+	7/11/01 (8/10/01)**	--
Draft Final ROD*	90 days after submittal of Draft ROD	10/9/01 (11/9/01)**
Final ROD Approval	30 days after submittal of Draft Final ROD	11/9/01 (12/10/01)**
Commence Remedial Action	Within 15 Months of Final ROD approval	2/11/02 (3/11/02)**

* Primary document (subject to Dispute Resolution Procedures)

+ Includes responsiveness summary and schedules for draft remedial design, completion of construction, Draft remedial action, public operations plan, and commencement of the remedial action.

** 30 days after start of public comment period. May be extended to 60 days if review extension for Proposed Plan requested (see revised deadline in parentheses).

SCHEDULE: GROUNDWATER OU

<u>Document</u>	<u>Deadline</u>	<u>Estimated Dates</u>
Draft Phase I Data Gaps Work Plan	7/1/99	--
Draft Final Phase I Data Gaps Work Plan	60 days after submittal of Draft Work Plan	9/1/99
Begin Phase I Field Work	10/1/99	--
Draft Phase II Data Gaps Work Plan	9/20/99	--
Draft Final Phase II Data Gaps Work Plan	90 days after submittal of Draft Work Plan	12/20/99
Begin Phase II Field Work	2/21/00	--
Draft FS Report	10/20/00	--
Draft Final FS Report*	1/22/01	--
Draft Proposed Plan (for agency review)	90 days after submittal of Draft Final FS Report	4/23/01
Draft Final Proposed Plan* (to Agencies and Public)	30 days after submittal of the Draft Proposed Plan	5/23/01
Final Proposed Plan Published	15 days after Draft Final Proposed Plan submitted to agencies	6/8/01
Start of Public Comment Period on Proposed Plan	5 days after publication of Proposed Plan	6/14/01
Draft Record of Decision (ROD)+	7/16/01 (8/14/01)**	--
Draft Final ROD*	90 days after submittal of Draft ROD	10/15/01 (11/14/01)**
Final ROD Approval	30 days after submittal of Draft Final ROD	11/15/01 (12/14/01)**
Commence Remedial Action	Within 15 Months of Final ROD approval	2/15/02 (3/14/02)**

* Primary document (subject to Dispute Resolution Procedures)

+ Includes responsiveness summary and schedules for draft remedial design, completion of construction, Draft remedial action, public operations plan, and commencement of the remedial action.

** 30 days after start of public comment period. May be extended to 60 days if review extension for Proposed Plan requested (see revised deadline in parentheses).