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Ser 1811GB/0062
12 APR 1989

Mr. Howard Hatayama
Department of Health Services
State of California
Toxic Substances Control Division
North Coast Section
2151 Berkeley Way, Annex 7
Berkeley, CA 94704

Dear Mr. Hatayama:

In accordance with the Remedial Action Order (Docket No. HSA87/88-134RA) for Naval Station, Treasure Island, Hunters Point Annex, the following reports are enclosed:

- 1) March 1989 Monthly Progress Report
- 2) Summary of 30 January 1989, Public Health and Environmental Evaluation (PHEE) Plan Review Meeting
- 3) Summary of 22 February 1989, Monthly Agency Meeting
- 4) Summary of 25 January 1989, Monthly Agency Meeting

Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Hs. Louise T. Lew, Code 1811, (415) 877-7502).

Sincerely,

Original signed by:

L. A. NICHLIN
Lieutenant Commander, CEC, USN
Director, Office of Environmental
Management

Encl:

- (1) March 1989 Monthly Progress Report
- (2) Summary of 30 January 1989, PHEE Plan Review Meeting
- (3) Summary of 22 February 1989, Monthly Agency Meeting
- (4) Summary of 25 January 1989, Monthly Agency Meeting

Copy to:

Regional Water Quality Control Board (Attn: Steve Ritchie)
 Bay Area Air Quality Management District (Attn: Scott Lutz)
 U.S. Environmental Protection Agency (Attn: Jerry Clifford)
 California Dept. of Fish & Game (Attn: Mike Rugg)
 U.S. Fish & Wildlife Service (Attn: Don Palavski)
 National Oceanic & Atmospheric Administration (Attn: Chip Demarest)
 City and County of San Francisco (Attn: David Wells)
 San Francisco District Attorney (Attn: Steve Castleman)
 Department of Health Services, Technical Support Unit (Attn: William Owen)

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Blind copy to: 09C5, 202, 09A2C.90, 18, 18A, 181, 1811, 1811GB (w/o encl)
Admin. Record, Harding Lawson Associates (Attn: Lisa Teague) (w/o encl)
PMC SF Bay (Code 420), COMNAVBASE San Francisco, NAVSTA Treasure Island
OIC Treasure Island, Hunters Point Annex
COMNAVSEASYSOM (Attn: Robert Milner)
WRITER: G. Brown/1811GB/750Z
TYPIST: B. Palmer/5 Apr 89/Ser 4133h
FILE: HP/DQHS

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MONTHLY PROGRESS REPORT
FOR
MARCH 1989

Re: Remedial Action Order
(Docket No. HSA87/88-034RA)
Naval Station, Treasure Island, Hunters Point Annex
(formerly Hunters Point Naval Shipyard)

1. Actions Taken During March 1989.

- A. The following field tasks have been performed in support of the remedial investigations:
1. Soil Gas sampling
 2. Well Sampling at Buildings 521 and 123
 3. Preliminary stormwater sampling
 4. Miscellaneous reconnaissance activities (e.g., selected pilot borings near IR-1, Landfill).
- B. The following documents were submitted to applicable regulatory agencies:
1. Summary Report, Interim Cleanup of PCB Contaminated Soils Near Former Building 503; Naval Station, Treasure Island, Hunters Point Annex, San Francisco, CA; March 3, 1989.
 2. Final Feasibility Study Plan, Remedial Investigation/Feasibility Study, Naval Station, Treasure Island, Hunters Point Annex; March, 1989.
 3. Final Data Management Plan, Remedial Investigation/Feasibility Study, Naval Station, Treasure Island, Hunters Point Annex; March 1989.
 4. Final Public Health and Environmental Evaluation Plan, Remedial Investigation/Feasibility Study, Naval Station, Treasure Island, Hunters Point Annex; March 1989
- C. The following documents satisfied regulatory consistency review this month:
1. Final Data Management Plan
 2. Final Feasibility Study Plan
- D. Benchscale treatability tests on the sandblast waste were successful in verifying the feasibility of heavy metal fixation. A work plan for pilot-scale and full-scale implementation is being prepared. The Navy is also investigating recycling alternatives for the sandblast waste via use in asphalt production. Discussions with applicable regulatory agencies have been initiated to investigate these alternatives.

MONTHLY PROGRESS REPORT
FOR
MARCH 1989

Re: Remedial Action Order
(Docket No. HSA87/88-034RA)
Naval Station, Treasure Island, Hunters Point Annex
(formerly Hunters Point Naval Shipyard)

2. Actions Expected to be Taken During April 1989.

A. The following field tasks are anticipated during April 1989.

1. Continuation of field investigations at the Group II Sites.
2. Implementation of the stormwater sampling program (weather dependent).
3. Implementation of Phase I field investigations at the Group I sites.
4. Soil Gas Survey (IR-2, Bayfill Area).

B. The following documents are expected to be submitted to the applicable regulatory agencies in April 1989:

1. Final Project Management Plan.

3. Any Requirements Under Order Not Completed:

None.

 for
LOUISE T. LEW PROJECT ENGINEER

4/11/89
DATE

Meeting Summary
Comments on PHEE Plan
January 30, 1989
Emeryville, California

002431

1. Attendees: See attached.
2. Agenda: See attached.
3. Purpose of Meeting: To discuss DHS and Navy comments regarding the Public Health and Environmental Evaluation (PHEE) Plan, including its attachment (the preliminary PHEE).
4. Chronology: The draft PHEE Plan is dated June 1988. The Department of Health Services (DHS) reviewed this document and provided their comments in a letter dated August 17, 1988. The Navy proposed changes and explanations in a letter dated October 4, 1988. DHS responded in a second letter dated December 23, 1988.
5. Preliminary PHEE: DHS was concerned that the document would become public and would still contain items with which they disagreed. The Navy explained that they did not intend to use the preliminary PHEE as the starting point for the final PHEEs because of the preliminary nature of the data used. The original purpose of the preliminary PHEE was to evaluate current potential risks, based on available data. It was agreed that the preliminary PHEE would not need to be revised if a preceding statement was added. This preceding statement would explain that the preliminary PHEE was for demonstration purposes and the later PHEEs would be produced "from scratch". In addition, copies of the Navy and agency correspondence would be placed in the PHEE Plan as an attachment to document DHS concerns.
6. Major DHS Concerns regarding the Preliminary PHEE: The following items will be considered in the preparation of future PHEEs:
 - o The list of indicator chemicals was, in some cases, too narrow and the risks were underestimated in the preliminary PHEE
 - o Some of the exposure pathways were not adequately considered in the preliminary PHEE, e.g. tracking releases at the landfill
 - o Drainage to the bay needs to be addressed
 - o The overall impact of the combined sites needs to be assessed.
7. Remedial Action Order (RAO): The DHS considered that two items were needed in the PHEE Plan to meet the requirements of the RAO. There

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needs to be an evaluation of existing data; DHS will accept the discussion in the preliminary PHEE for this item. Data gaps also need to be addressed. DHS felt that a more detailed discussion and/or table needed to be included in the PHEE Plan.

8. Environmental Sampling: The Navy received DHS comments on the conceptual approach. Chip Demarest (NOAA) has not yet looked at the description.
9. Terminology: The Navy preferred using federal terminology in the event that EPA might become involved in the future. DHS agreed as long as the terminology usage was consistent and clear. DHS stated that the Navy should use the least ambiguous terminology and should specify the units, where applicable.
10. Value for q^* : DHS does not want to see a chemical not considered because a q^* is not available; they prefer that the Navy calculate a q^* value in such a case. An agreement was made that the Navy would develop q^* values with DHS input. Such input would include: 1) whether the chemical is a carcinogen, and 2) which bioassays are appropriate to use for the q^* calculation.
11. Radioactivity: The Navy does not want to add radioactivity as an indicator chemical. DHS agreed to this approach, provided that a qualifying statement be included in the executive summary explaining that radioactivity would be screened from in the field.
12. Tributyl tin (TBT): DHS was inquiring into the possibility that TBT might bioconcentrate in bay organisms. DHS will discuss TBT with EPA and the Department of Fish and Game. DHS said that their primary concern is regarding the land-based problem; other agencies may be involved to address effects on the bay. It was discussed that analysis of TBT would not be routinely necessary if bioassays showed that the soil was not toxic.

1/30/89

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AFFILIATION

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Bill Owen	DHS Reg. 2	" 540-2592

AGENDA

PHEE Plan Meeting
January 30, 1989
Emeryville, California

002431

- I. Reference Documents
 - 1. DHS original comments, 8/17/88
 - 2. Navy response, 10/4/88
 - 3. DHS second comments, 12/23/88
- II. Revision of the preliminary PHEE
 - 1. Past use for sampling plans
 - 2. Relationship to future site PHEE
- III. Environmental Sampling Work Plan
 - 1. Concept
 - 2. Timing of phases
 - 3. Agency concurrence
- IV. Clarification of Specific DHS Comments
 - 1. Federal versus State terminology and methods
(Response II H.)
 - 2. Calculation of q^* values (Response II. I)
 - 3. Selection of indicator chemicals
(Response III.P.2)
 - 4. Occurrence of inorganic and/or organic tin
(Response III.Q.2)

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Meeting Summary
Monthly Agency Meeting
Hunters Point Annex

002432

February 22, 1989
Treasure Island, California

1. Attendees: see attached
2. Agenda: see attached
3. RI/FS Work Plan Documents: Implementation schedules for Groups I, III, IV, and the air sampling task will be sent to the agencies about February 23. The Navy has a dollar ceiling for current funds and is trying to utilize the Navy CLEAN contract to provide additional funds; currently, the Navy intends to concentrate on the Groups I and II work. The final PHEE Plan, revised per DHS comments and discussions, will be submitted to the agencies about March 17. The letter of clarification regarding the Group I Sampling Plan was sent to the RWQCB and other agencies on February 15. The final Community Relations Plan was submitted on January 19. The Navy recently received DHS conditional approval on the Data Management and Feasibility Study Plans; these documents are being finalized. DHS approval of the Project Management Plan was also received; the Navy will submit an update including resumes of additional and/or new personnel.
4. Pilot Borings: The last pilot boring, at IR-8 (the Building 503 PCB spill site), was only able to be drilled to 80 feet due to equipment limitations. Approximately 20 feet of fill underlain by 60 feet of bay mud was encountered. The Navy proposed to end the reconnaissance pilot boring investigation at this stage for now. DHS had no objections to this; however, they indicated that as the RI progresses it may be necessary to extend a boring to bedrock at this site.
5. Soil Gas Survey: The equipment has been repaired and the survey is scheduled to begin again on February 23. DHS indicated that they would meet Kam at his office at 1:30 pm on that date.
6. Field Investigations at IR-10 and IR-11: The wells are still being developed. All primary drilling and soil sampling activities have been completed.
7. Field Investigation at IR-6: The reconnaissance surface soil sampling has been completed. The Navy is awaiting receipt of the data from the microbial and chemical analyses.

8. Environmental Community Relations: At a recent San Francisco Bay Intergovernmental Coordinating Meeting, the DHS had a question regarding the ground rules for the HPA Technical Review Committee. As a result, the Navy is developing a response and will clarify the rules by the next monthly meeting.
9. DHS Personnel Changes: Effective the first week of April, Bill Owen will be transferring to the Sacramento Technical Support Services group where he will assume Jim Frampton's position as Team Leader for the Hunters Point Annex project. Lynn Nakashima will assume Bill's position as the DHS project officer.
10. San Francisco District Attorney: The SF DA has filed a \$2 million criminal lawsuit against Triple A Machine Shop. Triple A has contacted the Navy requesting access to conduct additional sampling at the sites indicated by the SF DA. The Navy intends to be represented at such sampling; the DHS indicated that the DHS doesn't plan to attend.
11. Sandblast Chemical Fixation Process: Results of the first bench-scale sampling and analysis were not favorable. As a result, the laboratory is reformulating the treatment process. The results are expected in March/April.
12. Underground Tank Program: IT is conducting the program. A report is expected in April and should include the results of the investigation of the soils and tanks and a plan for investigating the leaking tanks.
13. Deed Restriction: The DHS indicated that they had some specific language that they wanted in the deed restriction for the Building 503 PCB spill site. DHS gave the Navy an example of such language.
14. Next Meeting: March 22, 1989; 0930 hours; Treasure Island

Monthly Agency Meeting
 Hunters Point Annex

February 22, 1989
 Treasure Island, California

002432

<u>Name</u>	<u>Affiliation</u>
Lisa S. Trague	HLA
DAVID H. PETERSON	HLA
KAM F. TUNG	NAVST TI.
JOE RUZICKA	COMNAVBASE
Randy Friedman:	COMNAVBASE
Lynn Nakashima	DHS
Dave Wells	SF DPH
GREG BROWN	NAVY / WEST DIV
LOUISE LEW	NAVY
Scott Lutz	BAAQMD
Rm Bloch	ATF

AGENDA
Monthly Agency Meeting
Hunters Point Annex

February 22, 1989
Treasure Island

002432

I. RI/FS Work Plan Documents

- A. In preparation
 - 1. Schedules for implementation of Groups I, III, IV, and air sampling
 - 2. Revision of PHEE Plan
- B. Recently submitted
 - 1. Letter of Clarification per RQWCB (Group I Sampling Plan)
 - 2. Final Community Realitions Plan
- C. In DHS review
 - 1. Data Management Plan
 - 2. Project Management Plan
 - 3. Feasibility Study Plan

II. RI Field Activities

- A. Pilot Borings - Boring at Oil Ponds drilled on January 30 - February 2. Boring at PCB Site drilled February 7.
- B. Soil Gas Survey - started week of February 13; experienced minor delays due to equipment breakdown; plan to resume on February 22.
- C. SWAQAT- All samples collected; awaiting remainder of laboratory data.
- D. Building 521 - Wells and borings completed. Wells developed on February 8 - 10 and to be sampled during week of February 20.
- E. Building ¹²³~~521~~ - Wells and borings completed. Wells developed on February 8 - 10 and to be sampled during week of February 20.
- F. Tank Farm - Reconnaissance sampling completed; awaiting chemical and microbial results.

III. Environmental Community Relations

IV. Next meeting - date, time, place
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Meeting Summary
Monthly Agency Meeting
Hunters Point Annex
January 25, 1989

1. Attendees: See attached.
2. Agenda: See attached.
3. Homeporting: COMNAVBASE discussed the effect of the recent recommendation that would deactivate HPA. The recommendation has gone to Congress and they have 45 days to vote on it; if they do not vote, it automatically becomes law. A decision is expected to be finalized by April/May 1989. COMNAVBASE indicated that the environmental work would still continue but that most of the MILCON-related work would be canceled. The Navy will continue to pursue the proposed work at South Pier and the Galley.
4. DHS Personnel: The DHS announced that Dwight Hoenig had resigned. Howard Hatayama has taken his place; Howard's replacement has not yet been named.
5. PHEE Plan Meeting: A meeting is scheduled on January 30 at 10 am in Emeryville to discuss DHS comments on the draft PHEE Plan. Chip Demarest of NOAA will also attend.
6. RWQCB Comments on Group I Sampling Plan: The Navy is drafting a letter responding to an RWQCB request for clarification.
7. Work Plan Documents: To date, DHS has approved the Scoping Document, the Site Safety Plan, the Quality Assurance Project Plan (QAPP), the Air Sampling Plan, and the sampling plans for Groups I through IV. The PHEE Plan will be discussed and revised in accordance with agreements reached in an upcoming meeting (see Item 5, above). DHS expects to submit comments in February for the Data Management and Project Management Plans and in March for the Feasibility Study Plan.
8. Community Relations Plan: The final Community Relations Plan (CRP) was sent out on January 19. All of the regulatory agencies were included on the distribution list. The Navy had not planned to mail copies to anyone on the mailing list. DHS suggested that the Navy consider sending a copy to those who provided comments during the CRP development process.

9. Pilot Borings: A total of 17 borings have been completed. With concurrence from DHS, a pilot boring near the Oil Reclamation Ponds has been moved further inland because of access problems; field work will begin on January 30. The last pilot boring is located near the Building 503 PCB spill. A heavier hollow-stem auger rig is scheduled for February 6 to drill through the extensive boulder fill.
10. Soil Gas Survey: An initial test of the methodology was not productive due to the high water table at the site. As a result, the probe is being redesigned and another test will be scheduled. The Navy will notify DHS five days in advance. The Navy will also consider performing additional soil gas surveys later during the remedial investigations.
11. SWAQAT: Collection of one additional ambient air sample is awaiting adequate weather conditions.
12. Building 521 (IR-11): All borings and wells are completed except for one well northeast of the building where subsurface boulders have caused drilling problems. A heavier rig is scheduled for the week of February 6. The wells have not yet been developed and sampled.
13. Building 123 (IR-10): All borings and wells are completed. A few scrape samples from the building floor are to be collected and the wells are to be developed and sampled.
14. Tank Farm (IR-6): Nineteen surface and near-surface samples were collected for chemical analysis. Microbial counts are also being performed on selected samples.
15. Underground Utility Investigation: DHS concurs with the phased sampling approach and received the UTS report. The Navy does not need a letter from DHS regarding this.
16. Disposal of Investigation-Derived Wastes: The Navy gave DHS the analytical results from tests on wastes derived to date. DHS stated that wastes should be tested in accordance with CAC Article 11, Title 22. If the wastes are nonhazardous, then the Navy can dispose of them in any way. The tests include analyses for TTLCs, STLCs, and bioassays. DHS rule-of-thumb is: if the total concentration is less than ten times the STLC, then there is no possibility that the soluble concentration from a WET would exceed the STLC, and so WETs would not be needed. DHS stated that bioassays may be needed where there are no TTLC/STLC values or where several contaminants are found and the total effect is uncertain. In future, DHS wants to be notified of the results and how conclusions are determined; Navy does not have to wait for DHS concurrence prior to disposal.
17. DHS variances: DHS stated that the Navy should discuss this with DHS Permit personnel. Navy will call DHS to set up meeting.

18. Fence-to-fence cleanup: This task has been completed, and therefore will be deleted from future discussions.
19. Sandblast Grit Chemical Fixation Process: Data from the bench-scale test are due January 31; Navy will send results to DHS Alternative Technology Section. The Navy expects to submit work plans in March which will describe how the pilot study will be conducted.
20. Environmental Community Relations: Navy has received about 300 responses to the recent zip code mailing. Navy is awaiting responses regarding the Technical Review Committee; responses have not been received from DHS, EPA, RWQCB, and Mayor of San Francisco. The Navy considers the Community Relations Program to be in the implementation stage.
21. Next Meeting: February 22, 1989, 0930 hours, Treasure Island.

Agenda
Monthly Agency Meeting
Hunters Point Annex

January 25, 1989
Treasure Island, California

<u>NAME</u>	<u>AFFILIATION</u>
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GREG BROWN	WEST DIV
Louise Lew	WEST DIV
Bill Owen	DHS
Chen Kao	HLA DHS
DAVID H PETERSON	HLA
Randal Friedman	COMNAVBASE
Joe Ruzicka	COMNAVBASE SF
David Wells	SF DPH
Ron Block	ATT

Agenda
Monthly Agency Meeting
Hunters Point Annex

Harding Lawson Associates

January 25, 1989
Treasure Island, California

I. Status of RI/FS Work Plan

- A. In preparation
 - 1. PHEE Plan - awaiting discussion with DHS
 - 2. Letter of clarification to RWQCB
re: Group I site
- B. In DHS review
 - 1. Draft Data Management Plan
 - 2. Draft Project Management Plan
 - 3. Draft Feasibility Study Plan

II. RI Field Activities :

- A. Reconnaissance
 - 1. Pilot Borings - 17 out of 19 completed, problems with drilling at Oil Ponds and PCB Site
 - 2. Soil Gas Survey - initial test not productive due to high water table from recent rains
- B. SWAQAT
 - 1. Awaiting weather conditions
- C. Building 521
 - 1. Primary soil sampling near completion; one monitoring well to install
- D. Building 123
 - 1. Soil sampling nearly completed; samples submitted to labs
- E. Tank Farm
 - 1. Reconnaissance sampling (near-surface) completed, awaiting lab results
- F. Surface Water Sampling
 - 1. RWQCB will not comment in near future

Monthly Agency Meeting
Hunters Point Annex
January 25, 1989
Treasure Island, California

Harding Lawson Associates

III. Waste Disposal

- A. Analytical requirements for onsite disposal
- B. Coordination with DHS for disposal

IV. Fence-to-fence cleanup

V. Sandblast Grit Chemical Fixation Process

- A. Data from bench scale test

VI. Environmental Community Relations, COMNAVBASE

VII. Next meeting - date, time, place

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