



**DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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AR_NO0217_001105
HUNTERS POINT
SSIC NO. 5090.3.A

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Ser BPMOW.KF/0674

JUL 10 2007

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U.S. Environmental Protection Agency
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San Francisco, CA 94105-3901

Mr. Tom Lanphar
Department of Toxic Substances Control
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Berkeley, CA 94710

Mr. Jim Ponton
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear BCT Members:

Enclosure (1), the revised Hunters Point Shipyard Federal Facility Agreement (FFA) schedule, is presented for your review and approval. Enclosure (2), the comprehensive Hunters Point Shipyard project schedule, is provided for your information, but is not an FFA requirement. The FFA schedule summarizes submittal dates for Navy deliverables and agency comments enforceable per the FFA. To expedite your review of enclosure (1), note that there were several delays in the Feasibility Studies deviating from the FFA schedule submitted on September 8, 2006. These delays were related to the following issues:

- Resolving the integration of soil vapor risk criteria
- Use of the sea walls for control of exposure to soils
- Integrating clean up alternatives and Institutional Controls / Land Use Controls with current re-use plans

The Navy has been working with the agencies to address these issues over the last nine months, rather than submit documents that would not be sufficiently detailed to develop the RODs. A BCT meeting in the near future should discuss our parcel-by-parcel strategy for gathering soil vapor data and incorporating it into the CERCLA process.

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The updated FFA schedule does not include any soil vapor investigations; when these are determined, we will issue changes to the current schedule. Soil vapor investigations are expected to add 12 to 18 months to the schedules for each parcel.

The Navy's approach to integrating our radiological program with our CERCLA milestone documents is to "link" the programs at the Feasibility Study (FS) phase through the creation of FS radiological addenda. The Navy was optimistic in the September 8, 2006 schedule about acquiring funding and contract mechanisms to develop these radiological addenda. The addenda for Parcels B, D and E-2 were delayed several months because of these challenges. In this new FFA schedule, we are confident that the issue dates given for these radiological addenda will be met.

Specifically, here's a summary of the differences between the September 2006 FFA schedule and enclosure (1):

Parcel B

- The Parcel B Technical Memorandum in Support of a ROD Amendment (TMSRA) is delayed three months due to soil vapor risk and seawall issues and integration of institutional/land use control language with proposed re-use plans.
- The TMSRA addendum to address radiological contamination is delayed eight months because of contracting issues and adding a draft final version to the revised schedule.
- The Proposed Plan (PP) is delayed two months due to the revised schedule of earlier tasks.
- The Parcel B ROD amendment is now scheduled for completion in October 2008, shortening the schedule by two months.
- The estimated time to complete the remedial action has been extended to one year.

Parcel D

- The Parcel D FS is delayed seven months because of contracting issues and to incorporate institutional/land use control language used in the Parcel B TMSRA.
- The FS addendum to address radiological contamination is delayed seven months because of contracting issues.
- The PP is delayed seven months due to the revised schedule of earlier tasks.
- The Parcel D ROD completion is now scheduled for March 2009, a delay of five months.

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Parcel C

- The Parcel C FS is delayed seven months because of contracting issues and to incorporate institutional/land use control language used in the Parcel B TMSRA.
- The FS addendum to address radiological contamination is delayed seven months because of contracting issues.
- The PP is delayed six months due to the revised schedule of earlier tasks.
- The Parcel C ROD completion is now scheduled for April 2009, a delay of five months.

Parcel E

- The Parcel E Remedial Investigation (RI) is delayed eight months because of contractual issues and due to the complicated risk assessment.
- Seven months have been included in the schedule after the remedial investigation for a Risk Management Review (RMR).
- The FS study is delayed 20 months. The start of the FS has been changed to begin after the RMR; originally, the FS was scheduled to begin after comments were received on the draft RI report.
- The FS addendum to address radiological contamination is delayed 21 months because of contracting issues.
- The PP is delayed 21 months due to the revised schedule of earlier tasks.
- The Parcel E ROD completion is now scheduled for January 2011, a delay of 19 months.

Parcel E-2

- The Parcel E-2 RI/FS was delayed seven months to complete the human health risk assessment.
- The FS addendum to address radiological contamination is delayed seven months because of contracting issues.
- The PP is delayed six months due to the revised schedule of earlier tasks.
- The Parcel E-2 ROD completion is now scheduled for March 2009, a delay of five months.

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Parcel F

- The Parcel F FS has been delayed six months to address the conceptual model in greater depth.
- Preparation of the FS addendum is scheduled to begin after completion of a radiological data gap investigation scheduled for 2009 and 2010. The tentative date for the draft radiological FS addendum is delayed 14 months.
- The PP is delayed 14 months due to the revised schedule of the FS addendum.
- The Parcel F ROD completion is now scheduled for November 2011, a delay of 13 months.

Please note that the basewide radiological program is no longer listed as a separate section in the schedule; the documents and any future associated field work will be listed under the parcel pertaining to the work. The Navy intends to complete the ongoing Time Critical Removal Action for IR Site 50 (sanitary sewer and storm drain systems); our current plan is to fold the remainder of the program into the CERCLA milestone documents and execute the work through remedial actions rather than removal actions. As discussed at the May and June BCT meetings, the Navy is operating under a "must fund" scenario for FY08 and FY09. After completing the IR-50 TCRA, the Navy will focus on radiological addenda for the next two fiscal years. This approach may change if new funding becomes available; as of this date, there are no assurances of funding greater than the "must fund" amounts for FY08 and FY09.

Please forward your comments or written concurrence regarding enclosure (1) to me by Friday, August 10, 2007. Please contact me at (619) 532-0913 with any questions regarding the submittal.

Sincerely,



KEITH FORMAN

BRAC Environmental Coordinator

By direction of the Director

Enclosure (1) Federal Facility Agreement Schedule, Hunters Point Shipyard

Enclosure (2) Project Schedule, Hunters Point Shipyard

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Tetra Tech EMI
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ENCLOSURE 1

FEDERAL FACILITY AGREEMENT SCHEDULE

DATED 06 JULY 2007

THIS RECORD IS ENTERED IN THE DATABASE AND FILED
AS

RECORD NO. AR_N00217_001106

ENCLOSURE 2

COMPREHENSIVE PROJECT SCHEDULE

DATED 06 JULY 2007

THIS RECORD IS ENTERED IN THE DATABASE AND FILED
AS

RECORD NO. AR_N00217_001107