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07 JUN 1991

From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: FEDERAL FACILITY AGREEMENT DEADLINES FOR NAVAL STATION,
TREASURE ISLAND, HUNTERS POINT ANNEX

Ref: (a) 22 May 1991 mtg btwn WESTNAVFACENGCOM/EPA/DHS at
Naval Station, Treasure Island.

Encl: (1) Laboratory performance schedule dtd 15 May 1991
(2) Detailed schedule of field work/deliverables for OUs I, III, and IV
dtd 22 May 1991
(3) Summary table of revised schedule dates for OUs I, III, and IV dtd
22 May 1991

1. As discussed during reference (a), a number of events have occurred during the Remedial Investigation of Operable Units (OUs) I, III, IV, and the Site Investigation at PA-16 and PA-18 which necessitate the request for an extension of deadlines for certain deliverables under the Federal Facility Agreement (FFA) at Naval Station, Treasure Island, Hunters Point Annex. An explanation of the events which caused this request and a list of the affected deliverables is provided in the following paragraphs.

2. We request an extension of the deadlines for submitting the Summary of Findings Memorandum (SOFM) for OUs I, III, and IV, and the Site Investigation (SI) Report for PA-16 and PA-18 (part of Operable Unit V). If the extensions are granted, all primary document deadlines following the SOFM for OUs I, III, and IV, as well as the SI Report for PA-16 and PA-18, would be adjusted accordingly. Per Section 9.1 of the FFA an appropriately annotated summary matrix is set out below.

<u>Deliverable</u>	<u>Original Due Date</u>	<u>Extension Sought</u>	<u>Revised Due Date</u>
OU I SOFM	5/21/92	19 weeks	10/1/92
OU III SOFM	11/15/91	14 weeks	2/21/92
OU IV SOFM	11/22/91	8 weeks	1/17/92
PA-16 & PA-18 SI Report	6/30/91	10 weeks	9/9/91

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3. Enclosure (1) provides a listing of the anticipated schedule for receipt of analytical results for the samples collected between the last quarter of 1990 and the second quarter of 1991. As discussed during reference (a), a multitude of performance problems with the laboratories selected to perform the analysis of the primary phase field work for OUs I, III, and IV and PA-16 and PA-18 has occurred. The bulk of the samples for OU I, OU III (site IR-4), and PA-16 and PA-18 were sent to National Environmental Testing (NET) of Santa Rosa. The majority of the samples for OU III (site IR-5) and OU IV were sent to Eagle Pitcher Environmental Services (EPES). Each of these laboratories was directed to follow EPA Contract Lab Protocol (CLP), and were approved by both the State of California and the U.S. Navy for use in environmental testing. The contracts which had been awarded to each of these laboratories specified that these samples must be turned around in a prescribed format in 45 calendar days or less. Although the Navy was repeatedly assured that these laboratories had the capabilities and capacity to deal with the quantities of samples that was sent to them for analyses, the laboratories could not provide the required turn around times.

4. Additionally, problems were encountered in the field. The original schedules of the FFA for HPA were based on the assumptions that no drilling difficulties would be encountered. It was originally assumed that shallow borings/wells could be drilled/installed at the rate of two per day, and deep borings/wells could be drilled /installed at the rate of one per day. Based upon recent experience at HPA, the drilling has progressed at a rate of one shallow boring per day, one shallow well per 1.5 days, and one deep boring or well per three to four days. Drilling has been exceptionally difficult in the OU I sites due to obstructions which have necessitated changes in drilling techniques, a high refusal rate (up to 40% on some sites), and explosive levels of methane which have required backing away from the drill rig until the gases have dissipated.

5. The intent of the SOFM for all of the OUs is to provide an interim evaluation of the data which has been obtained in the Remedial Investigation for each site, and to determine whether data gaps exist. Data gaps must be addressed prior to the preparation of the Remedial Investigation Report in order to adequately characterize the extent and type of contamination present for each OU. Should obvious data gaps be identified, contingency phases for such events have already been approved in the respective work plans for each OU. Contingency work has also been negotiated as an option available to the U.S. Navy with their contractor conducting the investigation, with the intent to expeditiously obtain the necessary data to fill such gaps.

6. As a separate issue, the intent of the SI Report for PA-16 and PA-18 is to document the findings of the site investigation, and, in the case of OU V sites, to provide a draft RI work plan and schedule, unless a "No Further Action" determination is recommended for the respective sites.

7. Enclosure (2) provides a detailed schedule of the field and lab/data elements which must be satisfied prior to the submittals of the Summary of Findings Memorandum (SOFM) for OUs I, III, and IV. Additional information, such as the number of borings and wells, the types of analyses, and the list of analytes can be found in the approved work plans for each OU. The heavy solid black line on these schedules represent projected duration of activities, assuming optimistic or ideal conditions, as negotiated in the FFA. Based on these schedules, deliverable dates for primary and secondary documents of the FFA were then formulated.

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The light black solid line highlighted in pink represents the extended schedules that the U.S. Navy now requires in order to submit valid, technically sound SOFMs for OUs I, III and IV.

8. Enclosure (3) is a spreadsheet which shows the dates of each of the elements which affect the SOFM for the Operable Units. The first line for each Operable Unit indicates the calendar dates which should have been met in order to submit the SOFM for OUs I, III, and IV on the original dates of the FFA. The second line (highlighted) shows the current projected calendar dates for the corresponding elements, which lead to the submittal of the SOFM.

9. When it became apparent that there would be delays in the laboratory submittals, the Navy and their consultants consistently researched methods to meet the required submittal schedules for the OU I, III, and IV SOFMs and the SI Report for PA-16 and PA-18. Methods considered included inclusion of only two rounds of groundwater sampling in each SOFM, rearrangement of internal priorities, and authorization of additional labor hours for the Navy's consultants.

10. As a direct result of current laboratory performance problems, actions have been underway by the Navy and their consultants since January 1991. These actions include procuring additional analytical services from laboratories which were able to show a demonstrated ability to reproduce analytical data in an acceptable computer format, meet all quality control standards dictated by the EPA, State of California, and the Navy, and most of all, with sufficient capacity to handle our anticipated analytical SI/RI requirements at HPA.

11. Should you have any questions regarding this matter, please contact Louise T. Lew, Code 1811, at (415) 244-2551.

original signed by:
MICHAEL A. MIGUEL
By direction

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ENCLOSURE (1)
LABORATORY PERFORMANCE SCHEDULE
15 MAY 1991

SUBMISSION OF FEDERAL FACILITY
AGREEMENT DEADLINES: OU I, III, AND IV

THE ABOVE IDENTIFIED ENCLOSURE IS NOT
AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
SOUTHWEST DIVISION TO LOCATE THIS
ENCLOSURE. THIS PAGE HAS BEEN INSERTED
AS A PLACEHOLDER AND WILL BE REPLACED
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ENCLOSURE (2)
DETAILED SCHEDULE OF FIELD
WORK/DELIVERABLES FOR OU I, III, AND IV

SUBMISSION OF FEDERAL FACILITY
AGREEMENT DEADLINES: OU I, III, AND IV

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ENCLOSURE (3)
SUMMARY TABLE OF REVISED SCHEDULE
DATES FOR OU I, III, AND IV
22 MAY 1991

SUBMISSION OF FEDERAL FACILITY
AGREEMENT DEADLINES: OU I, III, AND IV

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