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Ser 1811JC/00744

25 JUN 1991

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

Subj: FEDERAL FACILITY AGREEMENT (FFA) EXTENSION REQUEST  
OF 7 JUNE 1991, NAVAL STATION, TREASURE ISLAND, HUNTERS  
POINT ANNEX

Ref: (a) DHS ltr, FFA Extension Request dtd 18 June 91  
(b) EPA ltr, FFA Extension Request dtd 18 June 91

1. This is in response to your respective letters of 18 June 1991, references (a) and (b), in which you declined to concur with our proposed extension of deadlines for the submission of the Summary of Findings Memorandum for Operable Units I, III and IV, and the Site Investigation Report for Preliminary Assessment Sites 16 and 18.

2. As we understand your letters, you have declined to concur with the extensions because you noted discrepancies in some of the dates we have proposed and also because you have a number of questions concerning the extensions.

3. We note that the Department of Health Services' letter references Section 9.4 of the Hunters Point Federal Facility Agreement (FFA). Notwithstanding that reference, it is not clear to us that the current situation implicates Section 9.4 of the FFA, or any other of its substantive provisions, for that matter.

4. We believe that this matter can and should be resolved informally by the Remedial Project Managers (RPMs). To that end, we will provide you with the additional information you have requested within the next several days. We ask that you review that information and, if you have any further questions, let us know at your earliest opportunity.

5. To the extent that our extension request and your subsequent nonconcurrence fall under the cognizance of the FFA, by this letter we invoke dispute resolution pursuant to Subsection 9.6 and Section 12, of the FFA. We repeat, however, that we believe that this matter should be resolved informally between the RPMs.

6. Should you have any questions regarding this issue, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Louise T. Lew, Code 1811, (415) 244-2551).

Original signed by:

MICHAEL A. MIGUEL  
By direction

Distribution:

U.S. Environmental Protection Agency (Attn: Chuck Flippo)  
California Department of Health Services (Attn: Bill Brown)  
Regional Water Quality Control Board (Attn: Steve Ritchie)

Copy to:

Bay Area Air Quality Management District (Attn: Scott Lutz)  
California Dept. of Fish & Game (Attn: Mike Rugg)  
U.S. Fish & Wildlife Service (Attn: Steve Schwarzback)  
National Oceanic & Atmospheric Administration (Attn: Chip Demarest)  
Hunters Point Technical Review Committee Public Member (Attn: Rev. Arelious Walker)  
City and County of San Francisco (Attn: David Wells)  
San Francisco District Attorney (Attn: Steve Castleman)  
Bay Conservation and Development Commission (Attn.: Nancy Wakeman)  
U.S. Dept. of the Interior (Attn: Bill Allen)

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