

5090
Ser 1811RC/L2107
21 JAN 1992

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

Subj: FEDERAL FACILITY AGREEMENT, DUE DATE EXTENSION REQUEST,
NAVAL STATION, TREASURE ISLAND, HUNTERS POINT ANNEX

Encl: (1) Schedule: Operable Unit III
(2) Drilling and Sampling Activities: OU III
(3) Operable Unit III Summary of Findings Memorandum and Draft RI Report Schedule

1. As discussed during the Technical Review Committee (TRC) Meeting of 4 Dec 91, a number of events have occurred during the Remedial Investigation of Operable Unit (OU) III, which necessitates extension requests for certain deliverable due dates under the Federal Facility Agreement (FFA) at Naval Station, Treasure Island, Hunters Point Annex. A summary of the events which caused this request and the affected deliverable is provided in the following paragraphs.

2. An extension of the due dates for submitting the Summary of Findings Memorandum (SOFM) for OU III is requested. If the extension is granted, all primary document deadlines following the SOFM will be adjusted accordingly, as shown on enclosure (1). Per Section 9.1 of the FFA, a summary matrix is set out below.

<u>Deliverable</u>	<u>Original Due Date</u>	<u>Extension Sought</u>	<u>Revised Due Date</u>
OU III SOFM	2/21/92	10 weeks	5/1/92

3. Phase 2B field work was scheduled to begin on September 30, 1991. However, the field work could not begin until the regulatory agencies concurred with the recommendations presented in the OU III Data Submittal; the submittal was distributed to the agencies on September 23, 1991. The cover letter, attached to the Data Submittal, specified that the field work would begin one week later than scheduled on October 7, 1991. However, upon receipt and review of the submittal, the agencies requested a meeting on October 9 to discuss comments and concerns regarding the Data Submittal. Consequently, field work could not begin until October 14, following the agency meeting.

4. There were 39 drilling refusals at Site IR-5 during the weeks of November 4th and 11th, causing further delay in the completion of Phase 2B field activities at OU III. Due to refusals, the hollow-stem auger rig halted drilling on November 13, 1991, with four borings (IR05B050, IR05B053, IR05B080, and IR05B083) remaining to be drilled using an air rotary casing hammer drilling rig. The borings could not be drilled until the use of an air rotary rig was approved and such rig was available. Drilling resumed with the air rotary rig on November 26, 1991 and ceased on December 3, 1991, resulting in a delay to the schedule of three weeks.

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5. The originally proposed Phase 2B field schedule was to be completed in three weeks by October 18, 1991. Due to scheduling delays, additional borings, and drilling refusals, Phase 2B field work was not completed until December 3, 1991, approximately seven weeks after the originally planned completion date. A week-by-week summary of Phase 2B field activities is presented in enclosure (2) and a revised Summary of Findings Memorandum and Draft RI report schedule is presented as enclosure (3).
6. 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. Drilling difficulties prolonged the duration of boring and well installation activities.
7. The Navy's original assumption for laboratory analysis and data validation turnaround time was 45 days. This has proven to be unachievable and the regulatory agencies have been informed of this invalid assumption during several occasions. Based upon one year of experience with HPA project logistics, the turnaround time for laboratory analysis and CLP validation is, at best, 75 days from day of sample collection to the day of validated data being available for database entry and analysis. The current extension request includes three additional weeks to allow for laboratory analysis and data validation process to be completed in an expedited 66-day turnaround.
8. 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 Navy with their contractor conducting the investigation, with the intent to expeditiously obtain the necessary data to fill such gaps.
9. Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command Attn: Louise T. Lew, Code 1811, (415) 244-2552.

Original signed by:

MICHAEL A. MIGUEL
By direction

Distribution:

U.S. Environmental Protection Agency (Attn: Roberta Blank)
Department of Toxic Substances Control (Attn: Bonnie Arthur)
Regional Water Quality Control Board (Attn: Steve Ritchie)

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Copy to:

Bay Area Air Quality Management District (Attn: Catherine Fortney)
California Department of Fish & Game (Attn: Mike Rugg)
U.S. Fish & Wildlife Service (Attn: Steve Schwarzbach)
National Oceanic & Atmospheric Administration (Attn: Mike Buchman)
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. Department of the Interior (Attn: Bill Allen)

Blind copy to: (w/o encl) 09B, 09CPB, 09A2A, 24, 1811RC
HLA (Attn: Ashok Verma), PRC (Attn: Gary Welshans), PWC S.F. Bay (Code 420)
NAVFAC 181, NAVFAC 09C (Attn: Ray Goldstein)

(w/encl) 1811, Admin Record (4 copies), COMNAVSEASYSKOM (Attn: Robert Milner),
COMNAVBASE S.F. WRITER: R. Chiang, Code 1811RC, X2554
OIC Treasure Island HPA TYPIST: M. Marshall, 22Jan 92, TRC/L2107
NAVSTA Treasure Island FILE: HPA

SCHEDULE: OPERABLE UNIT 3

Operable Unit 3 consists of the following IR Sites, as defined in the RI/FS Workplan: IR-4 (Scrap Yard); IR-5 (Old Transformer Storage Yard).

<u>Document</u>	<u>Deadline</u>	<u>Estimated Dates</u>	<u>Revised Schedule</u>
Final Summary of Findings Memorandum	02/21/92		5/01/92
Draft RI Report	08/21/92		10/30/92
Draft Public Health and Environmental Evaluation (PHEE) Report	11/05/92		1/14/93
Draft Initial Screening of Alternatives	07/31/92		10/09/92
Draft FS Report	01/11/93		3/22/93
Draft Proposed Plan (for Agency review)	45 days after submittal of draft FS Report	02/25/93	5/06/93
Draft Final RI Report*	Per Consultation Section	10/20/92	12/29/92
Draft Final PHEE Report*	Per Consultation Section	02/03/93	04/14/93
Draft Final FS Report*	Per Consultation Section	04/12/93	06/21/93
Draft Final Proposed Plan* (to Agencies)	60 days after submittal of draft Proposed Plan**	04/26/93	07/05/93
Final Proposed Plan Published	30 days after Draft Final Proposed Plan submitted to Agencies ⁺	05/26/93	08/04/93
Start of Public Comment Period on Proposed Plan	5 business days after publication of Proposed Plan	06/03/93	08/12/93
Draft Record of Decision (ROD) ⁺⁺	60 days after end of public comment period	10/01/93	12/10/93
Final ROD* (from USN with no signature)	60 days after submittal of draft ROD	12/01/93	2/09/94
Final ROD Approval	30 days after submittal of Final ROD	12/31/93	3/11/94

* Primary Document (subject to Dispute Resolution Procedures)

** Allows 15 days for Agency review; 45 days for US Navy response and revisions.

+ Allows 15 days for Agency review of draft Final Proposed Plan and 15 days to publish.

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

Phase 2B drilling and sampling activities for OUIII began on October 15, 1991 and were completed on December 3, 1991. The totals for each week of drilling are presented below.

WEEK ENDING	DAYS OF DRILLING	BORINGS COMPLETED	WELLS COMPLETED	BORINGS ATTEMPTED	WELLS DEVELOPED	WELLS SAMPLED	TOTAL FOOTAGE	REFUSAL FOOTAGE	SOIL SAMPLES	GROUNDWATER SAMPLES
18-Oct-91	5	8		8			233	0	60	
25-Oct-91	5	10	1	13			310	7	66	
1-Nov-91	4	6		6	1		154	0	39	
8-Nov-91	5	2	1	17			253.5	168	36	
15-Nov-91	2	1		26	1	7	73	56.5	7	7
22-Nov-91	0	0		0		7	0	0	0	7
29-Nov-91	2	2		2			48	0	12	
6-Dec-91	2	2		2			53.5	0	12	
TOTALS	25	31	2	74	2	14	1125	231.5	232	14

ENCL (2)

Operable Unit III Summary of Findings Schedule
Navy CLEAN Contract N62474-88-D-5086

Task	1991												1992															
	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
1 Operable Unit III	10/14 ↘												↙ 10/4															
2 Phase 2B Field Work	10/14 [shaded] 12/3																											
3 GW Sampling Round 2	11/11 [shaded] 11/22																											
4 Phase 2B Database Entry	11/20 [shaded] 12/10																											
5 Phase 2B Laboratory Analysis	11/23 [shaded] 1/17																											
6 Phase 2B Chemical Database Management	1/20 [shaded] 2/20																											
7 Data Validation (Full)	12/13 [shaded] 2/22																											
8 Data Evaluation	1/24 [shaded] 3/6																											
9 Prepare Summary of Findings Memorandum													2/27 [shaded] 3/25															
10 Navy Review													3/26 [shaded] 4/2															
11 Respond to Navy Comments													4/3 [shaded] 4/7															
12 Summary of Findings, Draft to Agencies													⊙ 4/7															
13 RI Report, Draft to Agencies													⊙ 10/4															