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Ser T4E1/L4011
05 Nov 1993

Mrs. Roberta Blank
U. S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Mrs. Blank:

Subj: FFA RI/FS SCHEDULES FOR PARCELS B/DRY DOCK 4 AND C

Enclosure presents updated parcel scheduling assumptions and Parcels B and C schedules through the Record of Decision for the CERCLA RI/FS process. This enclosure was scheduled for submittal on October 26; because of conflict between this effort and the BRAC Cleanup Plan Workshop held October 26 and 27, submittal has been delayed by several days.

The parcel schedules incorporate work proposed at the recent SI data presentations. As discussed at those presentations, the schedules also account for integration of the UST recommendations with the SI recommendations, and, in the case of Parcel B, with proposed supplemental RI work plans for Parcels B and C will be attached to the meeting notes for the Volume I Parcels B/C SI data presentation meeting.

The Navy looks forward to discussing the schedules and assumptions with the agencies over the next month. Possible dates for such discussions include November 8, 10, 17, and 18. These discussions will constitute an excellent opportunity for the BRAC Cleanup Team and the project team to establish the framework to implement both the BRAC Cleanup Plan for Hunters Point and President Clinton's decision to promote early reuse of closing bases. Please contact me regarding your availability for meeting on the indicated dates starting at 1:00 p.m. in the large conference room in Building B-103 at Western Division, Naval Facilities Engineering Command in San Bruno, unless the schedules and assumptions are able to be concurred with as presented.

Sincerely,

Original signed by:
RAYMOND E. RAMOS
Hunters Point BRAC Envir. Coordinator
By direction of
the Commander

Encl: (1) Assumptions and Schedules for Parcels B/Dry Dock 4 and C

Copies to:
Department of Toxic Substances Control (Attn: Cyrus Shabahari)
California Regional Water Quality Control Board (Attn: Barbara Smith)

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Blind copies to:
T4A, T4E1, T4E1DS, T4E1WM, T4E1WR, T4E1MM
09CMN, 09CJC, 18A
Admin Record (3 copies)
Chron, Blue, Pink, Green
File: HPA/IR

ASSUMPTIONS FOR PARCELS B/DRYDOCK 4 AND C RI/FS SCHEDULES

GENERAL

- 1) Implementation of the Quarterly Monitoring Program (QMP) will not result in additional field investigation nor affect the RI field program. Any data derived from the QMP will be used to supplement RI activities.
- 2) No interim reports will be submitted to the agencies prior to submittal of the Parcel RI report.
- 3) The USTs requiring further investigation have been incorporated into the Parcel RI schedule.
- 4) The Navy and regulatory agencies will agree upon representative ambient conditions in soil and groundwater at HPA by December 1, 1993 to allow for interpretation of RI sampling results.
- 5) Investigation of Formerly Used Defense Sites (FUDS) or areas off the HPA facility is not included in the RI. The Army Corps of Engineers has the administrative responsibility for the FUDS investigations.
- 6) Preparation of the Draft RI Reports will begin after completion of facility-wide investigations, Parcel RI sampling, lab analysis, data validation, and data interpretation activities. The report will include a baseline risk assessment. Preparation of the Draft RI report is assumed to require 35 weeks. The basewide human health and ecological risk assessment and the basewide Record of Decision will be included in with Parcel E, the last parcel on the investigation schedule.
- 7) Preparation of a Draft FS Reports will be completed 2 months after the completion of the Draft RI report.
- 8) The Draft Proposed Plans will be completed at the same time as the Draft Final FS Reports. The Draft Records of Decision will be completed four weeks after close of public comment on the Final Proposed Plans. The Proposed Plan/ROD process will be completed in 45 weeks.
- 9) The RI and FS Reports will be considered primary documents.
- 10) No summary reports presenting Tidal Influence Monitoring Program (TIMP), Air Sampling, ESAP, and ECA results will be prepared.
- 11) CLP analytical methods will be used.
- 12) Physical parameter testing will include: total porosity, moisture content, grain size, wet and dry bulk density, and total organic carbon.
- 13) All tasks shown on the attached schedules will be contracted, authorized, and funded by the Navy by the start dates shown.
- 14) These schedules do not account for any impacts of implementing President Clinton's decision to promote early reuse of closing bases.

KNOWN RI SITES IN PARCEL B

- 1) The RI program will be structured as follows:
 - a) Borings, wells, and test pits as proposed in Vol. I and Vol. II/III SI presentations,
 - b) Borings with Hydropunch as proposed in Vol. I and Vol. II/III SI presentations,
 - c) Wells installed as a result of interpretation of Hydropunch data.
- 2) Liquids and sludges in sumps identified for further investigation at PA-24 (Bldg. 130) and PA-25 (Bldg. 134) will be removed by November 15, 1993.
- 3) Clean-out of the storm drain catch basins at PA-57 will be completed by January 1, 1994 in order to complete RI work.
- 4) One drill rig will be used initially and will complete 2 soil borings per day, 1.5 wells per day, 2 hydropunch borings per day, 2 wells after hydropunch borings per day, or 2 piezometers per day.
- 5) Fuel lines and steamlines/utilidors will be drained and/or removed outside of the RI program. Soil sampling during removal of fuel lines and steamlines/utilidors is not addressed as part of the RI program.
- 6) The results of the RI sampling activities for Parcel B will be presented at a technical meeting in October, 1994 after the final (third) round of groundwater sampling. The results will include all soil, Round 1 groundwater, and aquifer test data results.
- 7) No contingency phase RI work is scoped for any of the new IR sites in Parcel B. It is assumed that additional sampling activities for these new IR sites will be minor, limited to further evaluation of the extent of soil contamination only, and can be completed within the confines of the schedule for RI work. If the results of initial RI sampling indicate a need for an extensive contingency phase, the RI/FS schedule will need to be extended.
- 8) Laboratory capacity will be 100 samples per week for the combined RIs at all parcels for the duration of the RI field program.
- 9) Laboratory analysis will be completed and available for database entry within 30 days of sample collection, and CLP data validation will be completed and available for database entry within 90 days of sample collection.
- 10) If proposed Exploratory Excavations (EE) are not performed by the start of the first round of groundwater sampling, an alternative plan (Plan 2), will be implemented to fill potential data gaps. Plan 2 consists of 4 borings at each EE location with soil sampling intervals of 0, 2.5, and 5 feet.
- 11) Slug tests will be performed on all existing and proposed monitoring wells. Constant-rate discharge tests will be performed on one-third of the total number of wells installed.
- 12) Ten percent of the total number of Hydropunch groundwater samples will be submitted to a CLP laboratory for confirmation analyses.

OTHER POTENTIAL RI SITES IN PARCEL B

- 1) In Parcel B there are approximately 12 sites in total that will be investigated as part of the audit of tenant and other operations during the last 10 years. One-half of the sites identified for investigation (i.e., approximately 6) will proceed into an RI program.

- 2) A courtesy copy of the report (including recommendations for further work and work plans) detailing the results of the investigation will be sent to the agencies in February, 1994. The RI program will begin prior to receiving comments from the agencies on the report.

KNOWN RI SITES IN PARCEL C

- 1) The RI program will be structured as follows:
 - a) Borings, wells, and test pits as proposed in Vol. I and Vol. III SI presentations,
 - b) Borings with Hydropunch as proposed in Vol. I and Vol. III SI presentations,
 - c) Wells installed as a result of interpretation of Hydropunch data.
- 2) Liquids and sludges in sumps identified for further investigation at PA-28 (Bldgs. 231 and 211/253) and PA-30 (Bldg. 241) will be removed by November 15, 1993.
- 3) Clean-out of the storm drain catch basins at PA-28, PA-29, and PA-58 will be completed by January 1, 1994 in order to complete RI work.
- 4) One drill rig will be used initially and will complete 2 soil borings per day, 1.5 wells per day, 2 hydropunch borings per day, 2 wells after hydropunch borings per day, or 2 piezometers per day.
- 5) Fuel lines and steamlines/utilidors will be drained and/or removed outside of the RI program. Soil sampling during removal of fuel lines and steamlines/utilidors is not addressed as part of the RI program.
- 6) The results of the RI sampling activities for Parcel C will be presented at a technical meeting in January, 1995 after the final (third) round of groundwater sampling. The results will include all soil, Round 1 groundwater, and aquifer test data results.
- 7) No contingency phase RI work is scoped for any of the new IR sites in Parcel C. It is assumed that additional sampling activities for these new IR sites will be minor, limited to further evaluation of the extent of soil contamination only, and can be completed within the confines of the schedule for RI work. If the results of initial RI sampling indicate a need for an extensive contingency phase, the RI/FS schedule will need to be extended.
- 8) Laboratory capacity will be 100 samples per week for the combined RIs at all parcels for the duration of the RI field program.
- 9) Laboratory analysis will be completed and available for database entry within 30 days of sample collection, and CLP data validation will be completed and available for database entry within 90 days of sample collection.
- 10) If proposed Exploratory Excavations (EE) are not performed by the start of the first round of groundwater sampling, an alternative plan (Plan 2), will be implemented to fill potential data gaps. Plan 2 consists of 4 borings at each EE location with soil sampling intervals of 0, 2.5, and 5 feet.
- 11) Slug tests will be performed on all existing and proposed monitoring wells. Constant-rate discharge tests will be performed on one-third of the total number of wells installed.
- 12) Ten percent of the total number of Hydropunch groundwater samples will be submitted to a CLP laboratory for confirmation analyses.

OTHER POTENTIAL RI SITES IN PARCEL C

- 1) In Parcel C there are approximately 24 sites in total that will be investigated as part of the audit of tenant and other operations during the last 10 years. One-half of the sites identified for investigation (i.e., approximately 12) will proceed into an RI program.
- 2) A courtesy copy of the report (including recommendations for further work and work plans) detailing the results of the investigation will be sent to the agencies in ____, 1994. The RI program will begin prior to receiving comment from the agencies on the report.

