

5090
Ser 1832.3/6070
January 8, 1996

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering Command
To: Distribution

Subj: SUBMISSION OF THE FIELD VARIANCE PROPOSAL FOR THE PHASE 1B ECOLOGICAL RISK ASSESSMENT FIELD SAMPLING PLAN, ENGINEERING FIELD ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA

Encl: (1) Proposal for field variance diagram

1. On January 3, 1996, a field variance for the sampling locations of the Phase 1B ecological risk assessment by EFA West was faxed to US EPA, California DTSC, and the Regional WQCB requesting approval. The following sampling locations are affected by this field variance: A5, B5, E1, E2, F2, K2, and K3. The Navy requested deletion of sampling locations A5 and B5; A5 because its located in the middle of land owned by the Port of San Francisco, and B5 because its located in an area in which the sediment is regularly being dredged by the Port of San Francisco and because there is another sampling location, C5, which is very close to B5 and thus would collect the same information as if B5 were collected. The Navy also requested moving the sampling locations for E1, E2, F2, K2, and K3. The sampling locations E1, E2, and F2 were affected by sharp slopes and debris at the bottom of the slope. Because it was extremely difficult to take samples under these circumstances, an alternate sampling locations were proposed. The sampling at locations K2 and K3 could not proceed due to a ship owned by one of the Navy's tenants being berthed over the sampling locations. Alternate sampling locations were proposed which the Navy feels will result in no compromise in the quality of data being collected and in line with the main objective of determining whether a gradient exist off of a transect.

2. Sheryl Lauth of US EPA deferred her decision to RWQCB on January 3, 1996 through a voice mail sent to Mike McClelland of the Navy. On the same day, Cyrus Shabahari of DTSC, after discussion with Richard Hiatt of RWQCB, indicated their approval of the Navy's variance with respect to sampling locations E1, E2, and F2. He requested a more detailed diagram and explanation for the remaining sampling locations.

3. On January 4, 1996, the information requested by Mr. Shabahari was hand-delivered to DTSC and faxed to US EPA, and RWQCB. The following day, Mr. Shabahari indicated his approval of the deletion of sampling location A5 with the provision that the sweep of analysis to be performed at A5 be performed at A4. Mr. Shabahari proposed relocating the sampling location B5 to a spot half the distance from B5 and B4. The Navy indicated to him that the area may also be regularly dredged by the Port of San Francisco and may not be a practical sampling location. He further went on to reject the relocation of the sampling locations K2, and K3 without the Navy having fully exhausted their resources and the Navy providing him with a chronology of

events on the efforts of the Navy to move the ship in question. The Navy indicated that the owner of the ship plans to move it on January 9, 1996, but plans to move in another ship in the same location the same day. The Navy will have approximately 2 hours to go in and take their samples at K2 and K3.

4. Enclosed are the diagrams of the sampling locations affected by this field variance. As a result of the consultation received from the agencies, the Navy will do the following: 1.) Delete sampling location A5 and analyze for its full sweep of constituents at location A4, 2.) Attempt to relocate the B5 half the distance between B5 and B4. If this is not possible or practicable, delete B5 and analyze for its full sweep of constituents at location B4, 3.) Relocate the sampling locations E1, E2, and F2 according to the enclosed diagrams, and 4.) Attempt to take samples at K2 and K3 on January 9, 1996 during the movement of the ships. If this cannot be done, sample at locations proposed in the original field variance request.

5. If you have any questions, the point of contact is Mr. Dave Song at (415) 244-2561.

(Original signed by:

RICHARD E. POWELL
By direction of
the Commanding Officer

Distribution:

U.S. Environmental Protection Agency (Attn: Sheryl Lauth)
U.S. Environmental Protection Agency (Attn: Claire Trombadore)
Roy F. Weston, Inc. (Attn: Karla Brasaemle)
California Department of Toxic Substances Control (Attn: Cyrus Shabahari)
California Regional Water Quality Control Board (Attn: Richard Hiatt)

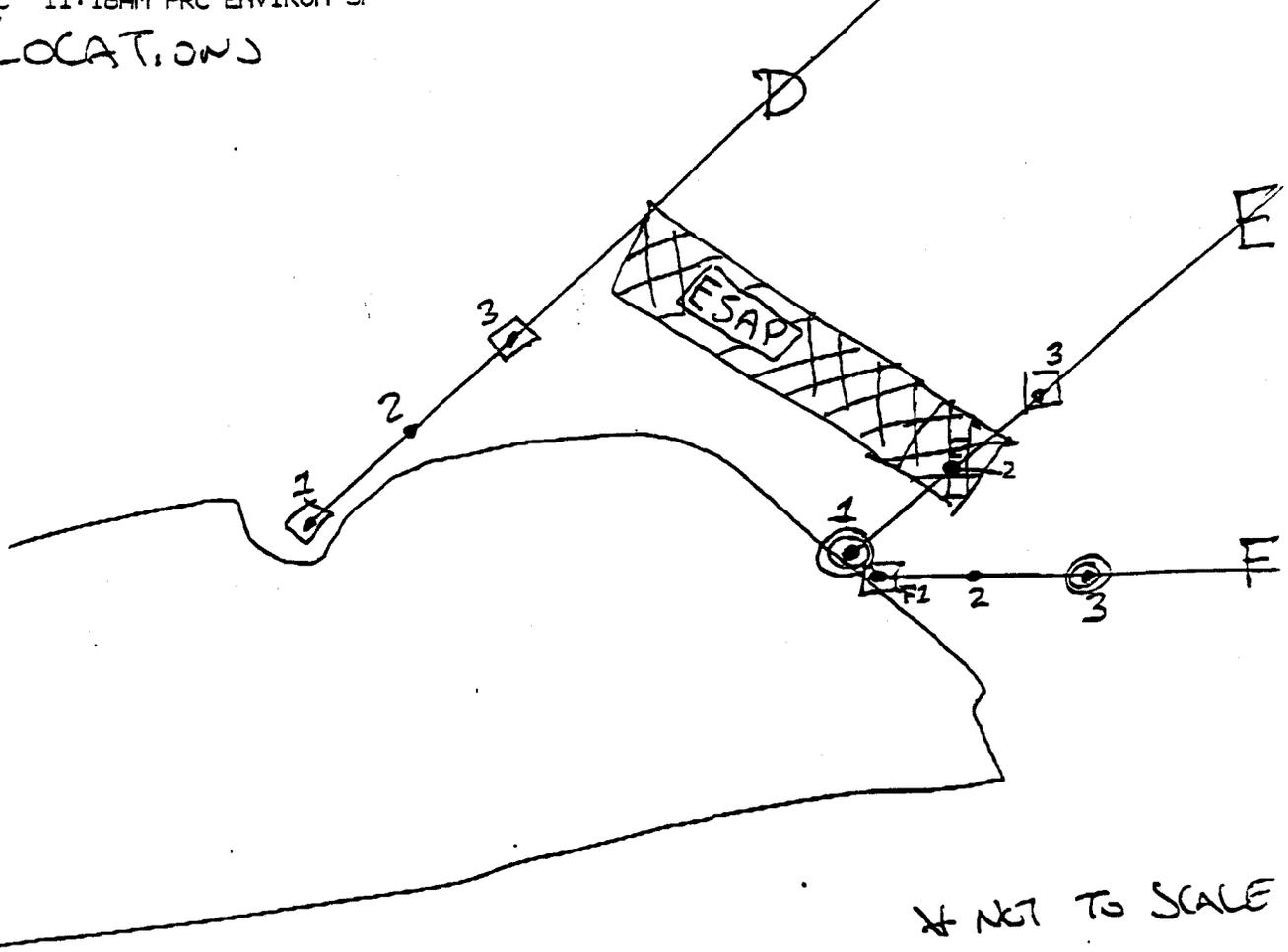
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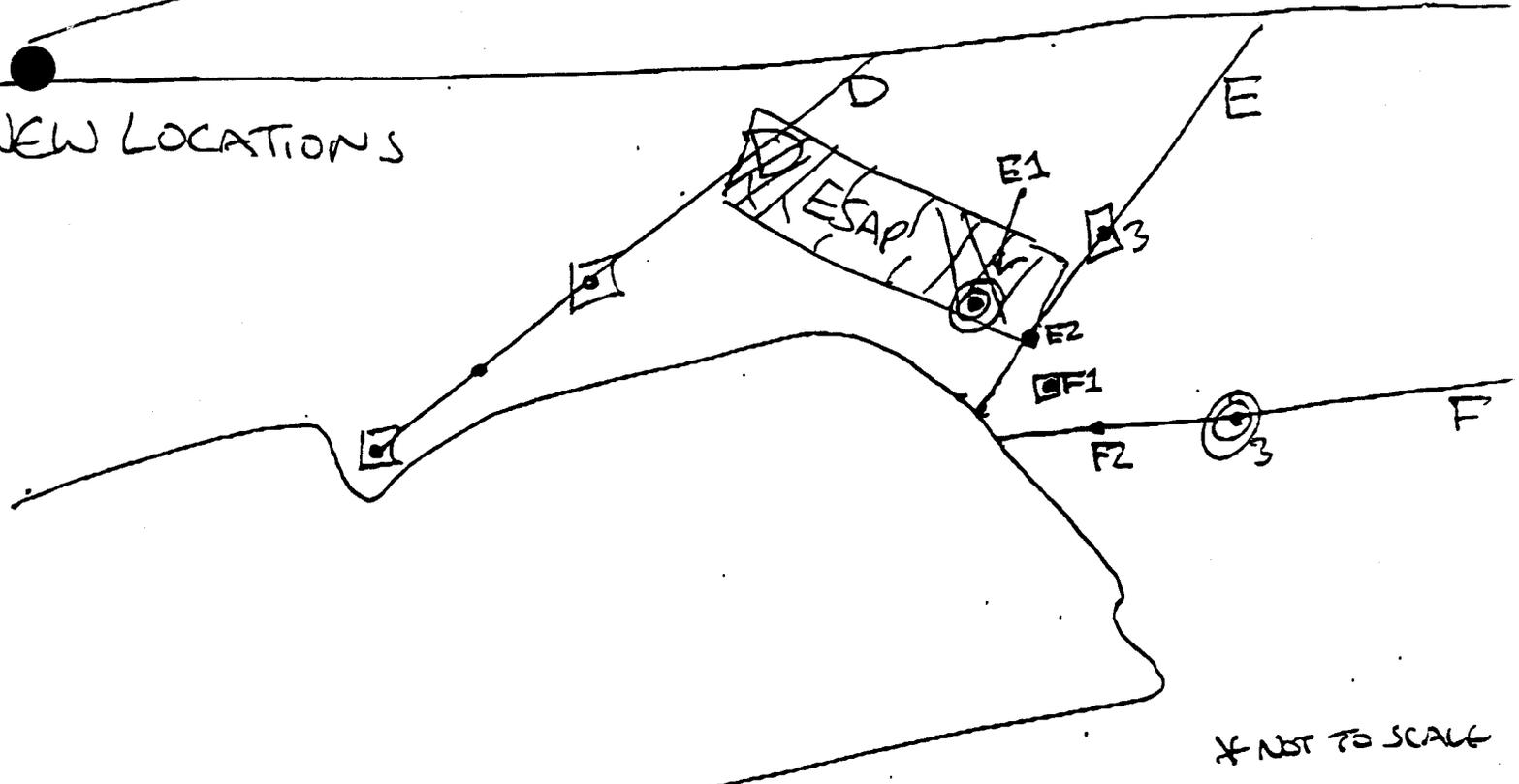
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OLD LOCATIONS



NEW LOCATIONS



- * NEED TO MOVE E1 OFFSHORE ~ 60 TO 70M
- * NEED TO MOVE F1 OFFSHORE ~ 60 TO 70M
- * E2 AND F2 MAY BE MOVED OUT ~ 10 TO 20M

