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

To: Distribution

Subj: MONTHLY PROGRESS REPORT FOR JUNE 1996 ENGINEERING FIELD
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS
POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Encl: (1) June 1996 Monthly Progress Report (MPR)

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2. If you have any questions, please contact the undersigned at (415) 244-2655.

Original signed by:

RICHARD E. POWELL
By direction of
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Harding Lawson Associates (Attn: Mr. David Leland)

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09CMN, 182A, 60B.1, 62C, HPS CSO
Admin Records (3 Copies, w/encl)
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**INSTALLATION RESTORATION PROGRAM
MONTHLY PROGRESS REPORT**

JUNE 1996

**NAVAL FACILITIES ENGINEERING COMMAND
HUNTERS POINT SHIPYARD**

1. PROGRESS DURING THE REPORT PERIOD

The activities described below were completed during the current report period. Those activities described as complete in the previous monthly progress report have been omitted for brevity. The facility status is as follows:

- **Field Work:** Remedial investigation fieldwork has been completed for Parcels B and C with the exception of surveying of borings and monitoring wells in Parcel C which will be completed in July. Most of the remedial investigation fieldwork has been completed for Parcels D and E. Those monitoring wells that have two rounds of groundwater samples collected will require one final sampling round in July. Four monitoring wells have been installed off-facility, immediately adjacent to the western Parcel E boundary. These wells will help define the groundwater gradient for the industrial landfill site (IR-01). First round sampling and groundwater level measurements should be completed during July.

The draft final field sampling plan for the proposed activities at the three formerly used defense sites (FUDS) in Parcel E was completed and submitted to the agencies for review during the month of May. The only comments received on the draft final plan were from the Agency for Toxic Substances and Disease Control (ATSDR). A response to ATSDR comments will be submitted in July. Implementation of the work plan began during this reporting period. Groundwater well installation and all required surveying will be completed at these sites in early July. The third round of groundwater sampling from these new FUDS wells is not expected to be conducted until mid-November 1996. All soil borings that are anticipated for the FUDS have been completed. The proposed boring locations at SI-74 and SI-75 had to be moved because access to these sites was denied by the property owner. The density of the utility lines in the vicinity of SI-74 have led to the replacement of the borings proposed at this site with a soil gas survey. A plan for this survey will be prepared in July or early August, and sampling is expected to be completed in August.

Indoor air sampling in Parcels B, C, and D has been completed. Limited outdoor air sampling to address remaining data gaps in Parcel E will be performed in August, 1996.

- **Parcel A:** The preparation of environmental documentation for transferring Parcel A from the Navy to the City of San Francisco continues on schedule. The next step in the transfer process consists of the preparation of the Environmental Baseline Survey (EBS) and Finding of Suitability to Transfer (FOST) documentation, along with the preparation of the Environmental Impact Statement/Report (EIS/EIR). A scoping meeting in March for the preparation of the Parcel A EBS/FOST documentation determined that a Parcel A-Specific

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EBS was not necessary. The Draft Parcel A FOST was submitted to the agencies for review on June 24.

In an additional Parcel A activity, the Navy prepared a Notice of Well Abandonment for Parcel A and obtained concurrence to proceed from EPA, DTSC, RWQCB, and the City of San Francisco. During the month of April, the Navy implemented the abandonment of six monitoring wells in Parcel A. A formal letter documenting the details of the well abandonment will be issued for the administrative record in July.

- **RI Reports:** The Draft Final Parcel B Remedial Investigation (RI) Report was submitted to the agencies on June 3, 1996. Agency comments are due in July. The Draft Parcel D RI Report was submitted on June 28, 1996; agency comments are due in August. Progress is ongoing in the preparation of the Parcel C and E RI reports.
- **FS Reports:** The Draft Parcel B Feasibility Study (FS) Report was submitted for agency review on June 3, 1996. The Draft Parcel B FS Report was originally due to the agencies for review on May 1, 1996. The Federal Facility Agreement (FFA) FS report submittal date was delayed 30 days to June 3 with concurrence of the agencies in order to incorporate information from the delayed Draft Final Parcel B RI Report. Agency comments on the draft FS report are due July 3. To keep the parcel on schedule, the agreed upon FFA delivery date for the Draft Final Parcel B FS Report remains August 1, 1996.
- **Removal Actions:**

Pickling and Plate Yard (IR-9): This removal action was completed by the Navy Public Works Center San Francisco Bay (Public Works). The Navy has started the preparation of the Draft Construction Summary Report and expects to submit this report in July 1996.

Exploratory Excavations: The preparation of documentation is being performed by PRC Environmental Management Inc. (PRC). PRC submitted the Draft Exploratory Excavation Action Memorandum for Navy and agency review on May 21, 1996. This document included a modification to the Draft Final Exploratory Excavation Engineering Evaluation/Cost Analysis (EE/CA) to specify off-site disposal of all excavated material as the preferred alternative.

The public comment period for the Draft Final Exploratory Excavation EE/CA ran from March 18 through April 16, 1996. On April 16, the Navy received comments from Ms. Amy Brownell (City and County of San Francisco). These were the only comments received. A responsiveness summary has been prepared and incorporated into the Action Memorandum. The Navy expects to start work on this removal in July or August of 1996.

IR-1/21 Industrial Landfill Groundwater Plume: The preparation of documentation is being done by PRC. PRC submitted the Draft Final IR-1/21 Groundwater EE/CA (Parcel E EE/CA) on May 28, 1996. As a result of comments received from the BRAC Cleanup Team (BCT), a Final IR-1/21 Groundwater EE/CA and revised response to comments will be submitted with the Draft IR-1/21 Action Memorandum on July 26, 1996. The Navy expects to start work on this removal in the late summer to early fall of 1996.

IR-3 Waste Oil Ponds: PRC and Levine-Fricke are preparing the documentation for this removal action. As a result of comments received from the BCT on the Draft IR-3 EE/CA, the Navy submitted a Preliminary Draft Final IR-3 EE/CA to the agencies for review on June 25, 1996. The revised EE/CA incorporates a new objective to contain and control contamination from IR-3 rather than remove contaminant sources. The new recommended alternative in the report involves the installation of a sheet pile wall. The Draft Final IR-3 EE/CA will be submitted following the receipt of agency comments due on July 3. The Draft IR-3 Action Memorandum is due to the agencies on July 19, 1996.

Storm Drains: The preparation of documentation is being done by PRC. Written comments on the Draft Storm Drain EE/CA were received on May 7, 1996 and comments on the Draft Final Storm Drain EE/CA were received on June 18, 1996. A Final Storm Drain EE/CA will be prepared and submitted for agency review by July 26, 1996, along with the Draft Storm Drain Action Memorandum. The Final EE/CA will incorporate the reduced scope of the removal which includes only sediment removal. After the sediment removal, storm water monitoring will be performed to determine if any contaminated groundwater is infiltrating into the storm drain system. If groundwater is found to be infiltrating, repair of those conditions will be addressed in the final remedial action.

Tank Farm (IR-6): This work is being performed by Public Works. The Navy submitted the Draft Final Tank Farm EE/CA on May 15, 1996. The public comment period for this removal action began on June 26, 1996.

Dry Dock 4: The preparation of documentation is being performed by Supervisor of Shipbuilding, Conversion and Repair, Portsmouth, Virginia, Environmental Detachment, Vallejo (SSPORTS). Additional sampling was conducted in February to perform the modified waste extraction test (WET) for bay water exposure. Preliminary results indicate low to non-detected concentrations of most metals. The Navy expects to submit the revised Draft Dry Dock 4 EE/CA August 8, 1996.

- **Ecological Risk Assessment Phase 1B:** No written comments were received on the Draft Preliminary Assessment (PA) Parcel F Report which was submitted for review on February 22, 1996. This document is now considered finalized and will not be revised. The offshore sampling supporting the Phase 1B Ecological Risk Assessment was completed on February 14, 1996. The chemical and bioassay data validation process for all samples has been completed. The submittal date for the Draft Phase 1B Ecological Risk Assessment Report is proposed by the Navy to be extended 60 days to September 30, 1996, to provide sufficient time for analysis and presentation of the data. The data analysis was delayed to accommodate an extended field sampling schedule. The Navy is reviewing potential impacts to the IR program that could result from this extension.
- **Radiation Issues:** (1) The low-level radioactive waste storage bin in Building 130 was manually ventilated to reduce the radon gas concentration. This is an ongoing monthly activity. (2) The Navy prepared an abbreviated feasibility study to evaluate the remedial alternatives, costs, public perception, and other factors associated with the removal of radium dials in the landfill. This issue is especially problematic because the dials are commingled with organic and inorganic contamination in the landfill. This document was

submitted to the regulatory agencies for input on April 30, 1996, and verbal comments were received on June 17. Following the receipt of written comments from the agencies, the BCT will decide on what follow up is required. (3) The response to agency comments on the Draft Phase III Radiation Investigation Field Work Plan was completed for internal review on April 30, 1996. The Draft Final Phase III Radiation Investigation Field Work Plan will be finalized after agency requests for complete historical documentation have been addressed. (4) The Draft Final Results of the Subsurface Radiation Investigation In Parcels B and E Report will be submitted to the agencies in early July, 1996. (5) The Navy submitted to the agencies a technical memorandum that addresses the tidal area surrounding IR-2 on June 13, 1996. (6) Meetings were held in January and March to discuss issues regarding the screening and disposal of investigation derived waste (IDW) drums as discussed in earlier progress reports. As a result of these meetings, the number of drums to be screened by the Navy's radiation contractor has undergone a change in scope. The estimated time of completion for the field screening survey is September 2, 1996.

- **Community Relations:** The Draft Revised Community Relations Plan (CRP) was submitted to the agencies for review on February 14, 1996. At the request of the EPA, four additional questionnaires were distributed to community members for inclusion in the draft final CRP. The additional questionnaires should allow input from those unavailable earlier, as well as reflect the recently elected City of San Francisco administration. The Draft Final Revised CRP was submitted on June 11, 1996.
- **PCB Occurrences:** EPA has identified concerns regarding the widespread occurrence of polychlorinated biphenyls (PCB) at low levels at the facility. The Navy has submitted an evaluation of locations with PCB concentrations that exceed 1 mg/kg to the adequacy of site characterization. This document was distributed to the agencies on June 26, 1996. Based on the evaluation, it appears that characterization of the occurrences of PCBs has been completed or will be performed under the ongoing RI fieldwork.

2. REPORTS SUBMITTED AND MEETINGS

Meetings

- The BCT/remedial project manager (RPM) meetings were conducted on June 4, 17, and 18, 1996.
- A RAB meeting was held on June 26, 1996. During this meeting, the Navy provided a presentation explaining the results of the Parcel B feasibility study and a poster session describing the IR-1/21 and storm drain removal actions.

Submittals

- The Draft Final Parcel B RI Report and the Draft Parcel B FS Report were submitted to the agencies on June 3, 1996.
- The Final Basewide Environmental Baseline Survey Report was submitted on June 3, 1996.

- The Draft Final Revised Community Relations Plan was submitted to the agencies for review on June 11, 1996.
- The Draft Radiation Investigation of the Tidal Area Surrounding IR-2 Technical Memorandum was sent out for agency review on June 13, 1996.
- The Draft Parcel A FOST was completed for review on June 24, 1996.
- The Preliminary Draft Final IR-3 EE/CA was submitted to the agencies for review on June 25, 1996.
- The Review of PCB Occurrences in Soil and Groundwater Technical Memorandum was delivered to the agencies on June 26, 1996.
- The Draft Parcel D RI Report was submitted for review on June 28, 1996.
- The Draft Annual OU-II Groundwater Monitoring Report was submitted to the agencies in June, 1996.
- The Draft Final IR-01/21 Groundwater Removal EE/CA was delivered for agency review in early June, 1996.

3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

- **Offsite Access for RI Work:** The Navy completed four groundwater monitoring wells off-facility, adjacent to the western boundary of IR-01 in Parcel E. Two of the wells were installed on City of San Francisco property as planned. The other two wells were inadvertently located on State property. The California Department of Parks and Recreation, the apparent trustee of the land, is expected to resolve this issue with the Navy to permit Navy access to these wells by the first part of August.
- **Parcel A FOST:** The Navy will perform a property boundary survey of Parcel A to provide a legal description for the FOST.
- **Agency Requests for Full Radiation Documentation:** The delivery of the Draft Final Phase III Radiation Investigation Field Work Plan has been delayed due to the agency requests for complete historical documentation. A meeting between the Navy Radiological Affairs Support Office (RASO) and the agencies to resolve documentation concerns is scheduled for July 11, 1996..
- **Petroleum-only Sites at HPS:** The Navy has started the identification of installation restoration sites within Parcels B through E that contain (1) petroleum-only constituents (non-CERCLA hazardous substances) in soils; (2) petroleum constituents with CERCLA substances in soils below screening levels; (3) CERCLA substances in soils above screening levels; and (4) sites that require no further action. The purpose is to segregate petroleum-only issues from CERCLA issues for administrative purposes, and inclusion of these sites in a petroleum corrective action plan.

- **Scope of the Basewide RI Report:** The current FFA lists a deliverable for a Basewide RI Report to accompany the delivery of the Parcel E RI Report. The scope of the Basewide RI is not currently defined. Current discussions concerning the Basewide RI are focusing on a Basewide ROD to address ecological issues. The preparation of the draft Parcel E RI Report before the final reports from the ecological risk assessment may result in a data gap which could obligate the Navy to prepare a Basewide RI/FS/ROD. The scope of a Basewide RI report and potential Basewide ROD are under discussion between the Navy and the BCT and will be included as a topic in upcoming BCT meetings. The Navy submitted a proposed scope of work for the Basewide RI to the agencies on June 14, 1996.
- **Hunters Point Shipyard Groundwater Ambient Levels (HGAL):** The Navy is developing HGALs, on a basewide basis, for naturally occurring metals that have a maximum contaminant level (MCL), U.S. EPA Region 9 tap water preliminary remediation goal (PRG), or National Ambient Water Quality Criteria (NAWQC). The purpose of establishing HGALs is to have an ambient value for each naturally occurring metal in the HPS A-Aquifer groundwater to compare against detected metals in A-Aquifer groundwater monitoring wells. The Navy is in communication with DTSC to formulate the methodology for the development of the HGALs. Based on these discussions, the Navy completed the preliminary statistical analysis and submitted it to DTSC on June 21, 1996.
- **Ecological Risk Assessment, Phase 1B:** The Navy is proposing to extend the delivery date for the Draft Report from August 1, 1996 to September 30, 1996. The delay is the result of an extended field sampling schedule and increased data analyses.

4. REPORTS AND ACTIVITIES FOR JULY 1996

Documents Scheduled for July 1996 Submittal

- Final IR-1/21 Groundwater Removal EE/CA
- Draft IR-1/21 Groundwater Removal Action Memorandum
- Final Storm Drain Sediment Removal EE/CA
- Draft Storm Drain Sediment Removal Action Memorandum
- Draft Final IR-3 EE/CA
- Draft IR-3 Removal Action Memorandum
- Draft Pickling and Plate Yard Construction Summary Report
- Draft Final Results of the Subsurface Radiation Investigation In Parcels B and E Report
- Draft Final Phase III Radiation Investigation Field Work Plan
- Draft Final Study of Groundwater Sampling Methods for Metals Technical Memorandum

- Revised Draft Final IR-6 EE/CA
- Draft IR-6 Removal Action Memorandum
- Draft Final Exploratory Excavation Removal Action Memorandum

Activities Planned for July 1996

- **Field Investigations:** Continue with the implementation of the RI field work for all parcels. Tasks include **drilling**, monitoring well installation, **sampling**, surveying, and management of IDW.
- **Removal actions:** Continue work at Dry Dock 4 and IR-6. The removals at the exploratory excavation sites is due to begin in July. Continue with the preparation of the documentation for upcoming removal actions.
- **Survey of Parcel A Boundary:** Parcel A Boundary is to be surveyed to provide a legal description for the FOST.
- **Meetings:** Attend the BCT/RPM meeting scheduled for July 2, 1996. Attend the RAB meeting scheduled for July 24, 1996.
- **Radiation Issues:** Prepare for the screening of NRDL sites. Continue the radiation-related waste management activities. Prepare for a meeting between the Navy and the agencies to discuss NRDL documentation issues on July 11, 1996.
- **RI/FS Reports:** Continue the preparation of the Parcels C, D and E RI reports. Prepare for a meeting regarding the agencies comments on the Draft Parcel B FS between the Navy and the agencies on July 18, 1996.
- **BCT Activities:** Prepare for the monthly BCT/RPM meeting.
- **CRP Activities:** Prepare for the HPS open house on July 25, 1996.

5. KEY PERSONNEL CHANGES

Navy: A replacement for David Song, who left the project on June 21, has been designated. The new RPM, Glenna Clark, is tentatively responsible for Parcel C, Dry Dock 4, and petroleum corrective action plans. As previously stated, RPM Luann Tetirick will manage the IR-3 removal action, Parcel E, and radiation issues, with the addition of the IR-1/21 removal action. The final delegation of the responsibilities of the RPMs is still to be determined.

6. DELIVERABLES STATUS

This listing consists of installation deliverables organized by parcel, multiparcel (or facility wide), and removal actions, and their status. Please note that as deliverables are completed, they will no longer be included in subsequent progress reports.

Parcel A Reports

- Draft Parcel A Finding of Suitability to Transfer
Status: Submitted to agencies for review on June 24, 1996.

Parcel B Reports

- Draft Final Parcel B Remedial Investigation Report
Status: Submitted to agencies on June 3, 1996. Agency review period is 30 days.
- Draft Parcel B Feasibility Study Report
Status: Submitted to agencies on June 3, 1996. Agency review period is 30 days.

Parcel C Reports

- Draft Parcel C RI Report
Status: Scheduled submittal to agencies on November 30, 1996. Agency review period is 45 days. Currently undergoing data base quality control, data interpretation, and report preparation.

Parcel D Reports

- Draft Parcel D RI Report
Status: Submitted to agencies on June 28, 1996. Agency review period is 45 days; comments are due August 12, 1996.

Parcel E Reports

- Draft Radiation Investigation of the Tidal Area Surrounding the Bay Area Landfill (IR-02) Technical Memorandum
Status: The report was submitted to the agencies on June 20, 1996; the Navy is currently awaiting agency comments.
- Draft Parcel E RI Report
Status: Scheduled submittal to agencies on April 29, 1997. Agency review period is 45 days. Currently performing quality control of the Parcel E database.

Parcel F Reports

- Draft Final Preliminary Assessment Parcel F
Status: No written comments were received on the draft Parcel F Preliminary Assessment (PA). A draft final PA will not be prepared.
- Draft Phase 1B Ecological Risk Assessment Report
Status: but EPA has concurred with the conclusions and DTSC has deferred to EPA. Scheduled submittal to agencies is proposed to be delayed 60 days to September 30, 1996. Currently undergoing data interpretation.

Multiparcel/Facility-Wide Investigation Reports

- Draft Final Results of Subsurface Radiation Investigation on Parcels B and E
Status: The ~~revised~~ document is under internal Navy review and will be submitted to the agencies in ~~mid~~ July.
- Draft Final Phase III Radiation Investigation Field Work Plan
Status: Submittal due to the Navy was April 26, 1996; however, due to agency requests for ~~complete~~ historical documentation, the delivery has been delayed pending guidance from RASO and a discussion with the regulatory agencies on July 11, 1996.
- Draft Annual OU II Groundwater Monitoring Report
Status: Submitted to the agencies in June, 1996.
- Draft Final Revised Community Relations Plan
Status: Delivered to the agencies on June 11, 1996.
- Final Basewide Environmental Baseline Survey
Status: Submitted to the agencies on June 3, 1996.
- Draft Study of Groundwater Sampling Methods for Metals Technical Memorandum
Status: Distributed to the agencies in May and currently awaiting comments.
- Draft Review of PCB Occurrences in Soil and Groundwater Technical Memorandum
Status: Submitted to the agencies on June 26, 1996.

Removal Actions

- Final IR-1/21 Groundwater Removal EE/CA
Status: To be submitted to the agencies on July 26, 1996, with the Draft IR-1/21 Action Memorandum.
- Draft Final IR-3 Floating Product Removal EE/CA
Status: Submittal due to the agencies on July 19, 1996, with the Draft IR-3 Action Memorandum.
- Final Storm Drain Sediment Removal EE/CA
Status: The Final EE/CA will be submitted to the agencies on July 26, 1996, with the Draft Storm Drain Action Memorandum.
- Draft Construction Summary Report of Pickling and Plate Yard Removal Action
Status: Due 90 days after completion of the removal action. Draft report is due in July 1996.

Richard Powell

RICHARD POWELL
LEAD REMEDIAL PROJECT MANAGER

7-15-96

DATE