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15 Jan 1997

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering  
Command  
To: Distribution  
Subj: MONTHLY PROGRESS REPORT FOR DECEMBER 1996, ENGINEERING FIELD  
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS  
POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA  
Encl: (1) December 1996 Monthly Progress Report (MPR)

1. Enclosure (1) is forwarded for your information.
2. If you have any questions, please contact the undersigned at (415) 244-2655.

**Original signed by:**

RICHARD E. POWELL  
By direction of  
the Commanding Officer

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RAB Member: ROSE (Attn: Mr. Charles L. Dacus, Sr.)  
RAB Member: Mr. Alonzo L. Douglas  
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RAB Member: Innes Avenue Coalition (Attn Ms. Jill Fox)  
RAB Member: Hillside Homeowners (Attn: Ms. Bonnie Fraenza)  
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RAB Member: Forest Hill Association (Attn: Mr. James A. Heagy)  
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**INSTALLATION RESTORATION PROGRAM  
MONTHLY PROGRESS REPORT**

**DECEMBER 1996**

**NAVAL FACILITIES ENGINEERING COMMAND  
HUNTERS POINT SHIPYARD**

**1. PROGRESS DURING THE REPORT PERIOD**

The Hunters Point Shipyard (HPS) Installation Restoration Program (IRP) 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.

**Field Work**

Remedial Investigation (RI) field work, with the exception of the Phase III Radiation Investigation, has been completed for Parcels B, C, D, and E. The Phase III Radiation Investigation will survey those buildings used by the Naval Radiological Defense Laboratory for radiation research which are missing documentation from the Nuclear Regulatory Commission's previous screening and release activities at HPS. The Phase III field screening is scheduled to begin in mid- January and is expected to take approximately 6 weeks to complete.

Routine waste management tasks were performed during December, including collecting and sampling investigation-derived waste (IDW), accumulating it in tanks and bins, and inspecting bin locations and the decontamination pad.

**Remedial Investigation (RI) Documents**

**Parcel A:** As stated in the November MPR, the draft final Parcel A finding of suitability to transfer (FOST), along with responses to the comments received on the draft Parcel A FOST, was scheduled for submittal in November 1996. However, because additional questions were received from the City and County of San Francisco regarding lead-based paint concerns in Parcel A, the draft final Parcel A FOST is now rescheduled for submittal in January 1997.

**Remedial Investigation (RI) Reports:** Currently, two sets of comments on the Parcel D RI report are in preparation. The response to comments received from the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board, regarding the draft Parcel D RI (accidentally omitted in the draft final RI), and a response to comments received from EPA on December 3, 1997, on the draft final Parcel D RI report. These responses to comments will be addressed as a separate attachment, and are expected to be submitted in January. The draft Parcel C RI report was submitted on November 29, 1996, and comments from the regulatory agencies are expected on January 17, 1997. Progress is ongoing in the preparation of the draft Parcel E RI report.

**Feasibility Study (FS) Reports:** The Parcel D draft FS was submitted to the regulatory agencies on September 26, 1996, and the Navy received comments from the regulatory agencies on November 12 and 14, 1996. Responses to these comments will be submitted to the agencies concurrent with the

incorporation of the responses into the draft final report in January 1997. The preparation of the draft Parcel C FS report is ongoing, and will be submitted in February 1997.

**Proposed Plan (PP):** The Navy submitted the draft final Parcel B proposed plan (PP) on October 24, 1996. A public meeting was held on November 13, 1996, at which a 30-day extension of the public comment period was requested and granted. The end of the public comment period was December 26, 1996. Responses to the public comments on the draft final Parcel B PP will be addressed in the responsiveness summary of the Parcel B ROD. Preparation of the PP for Parcel D is ongoing.

**Record of Decision (ROD):** The Navy submitted the draft ROD for Parcel B to the regulatory agencies on October 17, 1996, and received comments on November 26, 1996. The revised Parcel B ROD is expected to be submitted in January 1997, with a final ROD expected in February or March 1997, depending on the comments received.

### Removal Actions

**Exploratory Excavations:** Exploratory excavation removal activities continued through December. Excavations are being backfilled with clean fill. This removal action is expected to be completed in March 1997.

**IR-1/21 Industrial Landfill Groundwater Plume:** Following evaluation of the cone penetrometer testing (CPT) and Hydropunch groundwater sampling, the alignment for the proposed sheet piling portion of the removal was finalized. The test section of sheet piling is expected to be installed near the end of January 1997.

**IR-3 Waste Oil Ponds:** To evaluate conditions at the IR-3 site, cone penetrometer testing and Hydropunch groundwater sampling has been proposed to define a possible alignment for sheet piling. The preliminary testing is scheduled to begin in January 1997.

**Storm Drains:** Work continued through the current report period. Removal of sediments from the storm drain lines commenced on October 17, 1996, and will continue for approximately 4 months.

**Tank Farm (IR-6):** Removal action work in the tank farm is being performed by the Department of Public Works and CH<sub>2</sub>M Hill. The public comment period on the EE/CA for this removal action began on June 26, 1996. The Navy has proposed to dig up metals and polychlorinated biphenyl (PCB) contaminated soil from the tank farm for off-site disposal. To ensure that the cleanup levels under the removal action is consistent with the Parcel B FS cleanup levels, the proposed excavation plan has been reviewed and modified as appropriate. The excavation is expected take place in January 1997. A treatability study addressing bioremediation is being conducted concurrently with the soil removal and is expected to be completed in January 1997.

### Ecological Risk Assessment Phase 1B

The draft phase 1B ecological risk assessment report has been divided into two volumes: Volume I, Part 1, Nature and Extent of Contamination; Part 2, Characterization of Risk to Aquatic Receptors; and Volume II, Chemistry and Toxicity Test Results. Volume I, Part 1 and Volume II were submitted September 30, 1996. Volume I, Part 2 was submitted on November 15, 1996, completing the submittal of the draft phase 1B ecological risk assessment report. An informal meeting was held on

December 3, 1996, to discuss the findings of this report. Comments from EPA and the National Oceanic and Atmospheric Administration were received on December 30, 1996, and from DTSC on January 3, 1997. Preparation of responses has been started.

### Radiation Issues

Responses to the regulatory agencies' comments on the draft Phase III Radiation Investigation Field Workplan were submitted on October 3, 1996. The draft final Phase III Radiation Investigation Field Workplan was submitted on October 13, 1996. Subsequent to these submittals the U.S. Environmental Protection Agency (EPA) notified the Navy that adequate documentation had not been provided in response to one of the comments given and they requested further justification. The Navy is currently attempting to obtain the requested documentation. Since the issue concerns only one of the multiple sites proposed for screening, the Navy is planning to proceed with field work on these other sites while resolving this one issue. The Navy is planning to implement the phase III radiation investigation work plan in January 1997, to allow incorporation of the results into the draft Parcel E RI report.

Additionally, the Navy submitted to the agencies a technical memorandum that addresses the tidal area surrounding IR-02 on June 28, 1996. Written comments were received from EPA, the California DTSC, and State of California Department of Health Services (DHS.) The Navy submitted responses on November 12, 1996. In those responses, the Navy stated its position that enough data has been collected to adequately characterize this area, and will incorporate it in the draft Parcel E RI.

Radiation-related field activities conducted during November included weekly inspections and maintenance of drums and bins containing potentially radioactive IDW. The remaining drums and bins of IDW from IR-01 and IR-02 will be chemically characterized and disposed of by a naval subcontractor in March 1997. A PRC subcontractor finished surveying and sampling drums and bins of IDW in September. The screening was completed within 2 weeks, and the analytical results were received in November. Initial evaluation of the data does not indicate any radioactive contamination. Following authorization for release, the IDW will be transported off site for disposal.

As a part of the Parcel D RI field investigation, a water sample was collected from the subsurface secondary containment vault outside of Building 364 to confirm that no gamma-emitting radionuclides were present at levels above discharge criteria. Analytical results were inconclusive; as a result, seven additional samples were collected and analyzed for gross alpha and beta radioactivity along with gamma-emitting radionuclides. Preliminary evaluation of the results confirms that no radionuclides at levels above discharge criteria. Confirmatory work will be conducted as part of the phase III radiation investigation.

### Community Relations

The draft final revised community relations plan (CRP) was submitted to the regulatory agencies on June 11, 1996; comments were received from DTSC on July 3, 1996. The Navy agreed to respond to DTSC's comments in mid-October 1996, but due to the need to update the roster of new Restoration Advisory Board (RAB), the response to DTSC's comments was scheduled for submittal in late November. The document was submitted on December 24, 1996.

## 2. MEETINGS AND REPORTS SUBMITTED

### Meetings in December 1996

Meetings of the Base Realignment and Closure (BRAC) Cleanup Team (BCT)/remedial project manager (RPM) meetings were held on December 2 and 3, 1996.

A RAB meeting was held on December 11, 1996. The RAB meeting in December consisted of (1) an informal discussion of the points raised at the Parcel B proposed plan meeting held on November 13, 1996, and (2) a presentation concerning the health risks from ingestion of fish from San Francisco Bay, given by a representative of the California Office of Environmental Health Hazard Assessment.

### Documents Submitted in December 1996

The following summarizes the documents submitted by the Navy during the report period:

- Final Revised CRP
- Draft BRAC Closure Plan (BCP)

## 3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

### Petroleum-Only Sites at Hunters Point Shipyard (HPS)

This issue occurs due to the need to segregate petroleum-only issues from CERCLA issues for administrative purposes, and to include the petroleum-only sites in a corrective action plan (CAP) for petroleum contamination. To evaluate the appropriate remediation or actions for the petroleum contaminants those sites that are petroleum only needed to be identified. As a result the Navy has identified those IRP sites that (1) contain petroleum only constituents and will be covered by the CAP; and (2) those sites that contain petroleum mixed with CERCLA regulated substances that will be cleaned up under the parcel specific remedial actions. This identification process will insure that all of the cleanup petroleum and CERCLA will be addressed in a consistent and timely manner. The preparation of these CAPs for all four parcels (B, D, C, and E) has begun, with the Parcel B CAP due in April 1997. Field sampling for bioassays began December 16, 1996. This work is being performed by AFA Construction. Initial evaluation of the field sampling indicates that another set of samples will be needed to provide samples with a gasoline component.

### Scope of the Basewide Remedial Investigation (RI) Report

The current Federal Facility Agreement lists basewide RI/FS/ROD report as a deliverable 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 draft Parcel E RI report will be submitted prior to the final phase 1B ecological reports, and may result in a data gap that may have to be addressed in the basewide ROD. The scope of a basewide ROD is still under discussion between the Navy and the BCT. The Navy submitted a proposed scope of work for the basewide R/FS/ROD to the agencies on June 14, 1996. The Navy and BCT continue to evaluate the need for and/or scope of such a document, as well as its submittal date. Currently it appears that the

schedule for a basewide RI/FS/ROD should be a separate schedule from the Parcel E schedule with its need to be determined in the future.

#### 4. REPORTS AND ACTIVITIES FOR JANUARY 1997

##### Documents Scheduled for Submittal in January 1997

The following documents are to be submitted in the next report period:

- Draft Final Parcel A FOST
- Draft Final Parcel D FS
- Response to Comments on the Draft Final Parcel D RI Report
- Draft Parcel D Proposed Plan

##### Activities Planned for January 1997

**Removal Actions:** Continue work at IR 1/21 and IR-6. Continue the removals at the exploratory excavations initiated in August 1996. Continue field work on the storm drain removal action began in September 1996.

**Meetings:** Attend the BCT/RPM meeting scheduled for January 1997. Attend the RAB meeting scheduled for January 22, 1997.

**Radiation Issues:** Initiate the screening of Naval Radiological Defense Laboratory sites, which was originally scheduled for September 1996. Continue the radiation-related waste management activities until Radiological Affairs Support Office contractor takes the IDW offsite. Continue to work on the resolution of the issues that EPA has brought up regarding the draft final phase III radiation investigation field work plan.

**RI/FS Reports:** Continue the preparation of the Parcel E RI report and the Parcel C FS report.

**Proposed Plan:** Continue the preparation of the responses to the public comments received on the draft final Parcel B PP. Continue preparation of the Parcel D PP, after receiving comments from the BCT.

**Draft ROD Document:** Continue preparation of the Parcel B ROD after receiving comments from the regulatory agencies on the draft ROD and incorporating any comments received from the public into the responsiveness summary to be attached to the ROD.

**BCT Activities:** Prepare for the monthly BCT/RPM meeting. Continue the preparation of the annual update of HPS BCP.

#### 5. KEY PERSONNEL CHANGES

David Preston of PRC, who provided technical support for radiation issues, has left the project and will be replaced by Melissa Mannion and Conrad Sherman.

## 6. DELIVERABLES STATUS

This listing consists of installation deliverables organized by parcel or multiparcel (or facility wide), removal actions, and their status. Please note that as deliverables are completed, they are not included in subsequent progress reports.

### Parcel A Reports

**Draft Final Parcel A FOST:** Scheduled for submittal to the agencies following resolution of the lead-based paint issue brought up by the City and County of San Francisco.

### Parcel B Reports

**Final Parcel B ROD:** Originally scheduled for February 9, 1997, delayed until March 14, 1997, pending resolution of applicable or relevant and appropriate requirements (ARARs) issues.

### Parcel C Reports

**Draft Parcel C RI Report:** Submitted to agencies on November 29, 1996. Agency review period is 45 days, comments due on January 27, 1997.

**Draft Parcel C FS Report:** Scheduled for submittal to the agencies on February 27, 1997. Agency review period is 45 days.

### Parcel D Reports

**Draft Final Parcel D RI Report:** Submitted to the agencies on October 25, 1996. Agency comments were received on December 3, 1996, and will be addressed in a separate attachment, to be submitted in January 1997.

**Draft Parcel D FS Report:** Submitted to the agencies on September 26, 1996. Agency comments were received on November 12 and 14, 1996. As a result of the nature of the comments an extension of the submittal of the draft final feasibility study has been requested, with a revised submittal date of January 24, 1997.

**Parcel D Proposed Plan:** Originally scheduled for submittal to the agencies on December 26, 1996. However, due to the need to coordinate the submittal of this document with the submittal of the draft final Parcel D FS, the Navy will be requesting an extension of the submittal date to January 15, 1997. Agency review period is 15 days.

### Parcel E Reports

**Draft Radiation Investigation of the Tidal Area Surrounding the Bay Area Landfill (IR-02) Technical Memorandum:** The report was submitted to the agencies on June 20, 1996. The Navy received agency comments and submitted responses on November 26, 1996.

**Draft Parcel E RI Report:** Scheduled for submittal to agencies on April 29, 1997. Agency review period is 45 days.

## **Parcel F Reports**

**Draft Phase 1B Ecological Risk Assessment Report:** Part 2 of Volume I of the phase 1B ecological risk assessment was submitted on November 15, 1996. Volume 1, Part 1 and Volume 2 had been submitted previously to the agencies, on September 30, 1996. Agency review period is 45 days and starts on November 15, 1996. The draft final report is submitted 45 days after receipt of agency comments. The Navy received comments from the regulatory agencies on December 30, 1996.

## **Multiparcel/Facility-Wide Investigation Reports**

**Draft Final Results of Subsurface Radiation Investigation on Parcels B and E:** The report was submitted to the agencies in mid-July. Comments were received from the EPA and responses to the comments were submitted on December 17, 1996.

**Draft Final Phase III Radiation Investigation Field Work Plan:** Submitted to the regulatory agencies on October 15, 1996. As stated previously, discussion between the Navy and agencies will be necessary to finalize specific response to comments received from Cal/EPA and comments received from U.S. EPA on the Draft Phase III Radiation Investigation Field Work Plan.

**Draft Final Revised Community Relations Plan:** Submitted to the agencies on December 24, 1996.

**HPS BRAC Closure Plan:** Scheduled for submittal on February 21, 1997.

## **Removal Actions**

**Draft Final Construction Summary Report of Pickling and Plate Yard Removal Action:** The draft report was submitted to the agencies on August 2, 1996. Agency comments were received on October 23, 1996, responses are currently being prepared by the Navy, and are scheduled to be submitted on January 1997.

**Draft Construction Summary Report of Exploratory Excavations:** To be prepared following completion of removal action.

**Draft Construction Summary Report of IR-1/21 Groundwater Removal Action:** To be prepared following completion of removal action.

**Draft Construction Summary Report of IR-3 Floating Product Removal Action:** To be prepared following completion of removal action

**Draft Construction Summary Report of Storm Drain Sediment Removal Action:** To be prepared following completion of removal action

7. ABBREVIATIONS

AOC	Area of Concern
ARARs	applicable or relevant and appropriate requirements
BCT	BRAC cleanup team
CAL	California
CAP	corrective action plan
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CPT	cone penetrometer testing
CRP	Community Relations Plan
DHS	State of California Department of Health Services
DTSC	Department of Toxic Substances Control
EE/CA	Engineering Evaluation/Cost Analysis
EPA	Environmental Protection Agency
FOST	Finding of Suitability to Transfer
FS	Feasibility Study
HPS	Hunters Point Shipyard
IDW	investigation-derived waste
IR	Installation Restoration
PCB	polychlorinated biphenyl
PP	Proposed Plan
RAB	Restoration Advisory Board
RAC	Remedial Action Contractor
RI	Remedial Investigation
ROD	Record of Decision
RPM	Remedial Project Manager
SI	Site Inspection

  
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Richard Powell  
Lead Remedial Project Manager

1-15-97  
Date