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18 Mar 1997

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

Subj: MONTHLY PROGRESS REPORT FOR FEBRUARY 1997, ENGINEERING FIELD ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Encl: (1) February 1997 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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ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS
POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

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**INSTALLATION RESTORATION PROGRAM
MONTHLY PROGRESS REPORT**

FEBRUARY 1997

**NAVAL FACILITIES ENGINEERING COMMAND
HUNTERS POINT SHIPYARD**

1. PROGRESS DURING THE REPORT PERIOD

The Hunters Point Shipyard (HPS) Installation Restoration (IR) Program 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 began in mid- January and was expected to take approximately 6 weeks to complete. As a result of adverse weather conditions, the field work has taken an additional 3 weeks to complete. The field work is expected to be complete by the middle of March.

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

Remedial Investigation (RI) Documents

Parcel A: The draft final Parcel A finding of suitability to transfer (FOST) submittal has been delayed because additional questions were received from the City and County of San Francisco regarding lead-based paint concerns in Parcel A. The submittal date is still to be determined.

Remedial Investigation (RI) Reports: Response to comments on the draft final Parcel D RI report were prepared. These responses to comments were addressed as a separate attachment, and submitted on February 25, 1997.

The draft Parcel C RI report was submitted on November 29, 1996, and comments from the regulatory agencies were received on January 27, 1997. Responses are in preparation and will be provided along with the draft final report which is due on March 13, 1997, which is 45 days after the receipt of the comments. Progress is ongoing in the preparation of the draft Parcel E RI report.

Feasibility Study (FS) Reports: The draft final Parcel D FS which included responses to comments was submitted to the regulatory agencies on January 24, 1997, with a 30 day review period ending on February 24, 1997. The Navy has not received written notice from the regulatory agencies regarding any items for dispute resolution; however, Department of Toxic Substances Control (DTSC) and U.S. Environmental Protection Agency (EPA) have sent letters to the Navy dated February 26, 1997 and

February 28, 1977, respectively, in which they have deferred approval of the Parcel D FS until after the resolution of the facility-wide groundwater issues. The draft Parcel C FS report was submitted on February 27, 1997. The review period for this document is 45 days, ending on April 13, 1997.

Proposed Plan (PP): The Navy submitted the preliminary draft Parcel D proposed plan (PP) on January 15, 1997. The draft final PP for Parcel D has been delayed to allow for the preparation of a technical memorandum which includes a facility wide hydrogeologic model and contaminant concentration maps that was requested by the regulatory agencies. To allow for preparation and review of this technical memorandum, the Base Realignment and Closure (BRAC) Cleanup Team (BCT) has mutually agreed to the extension of the deadline for the draft final Parcel D PP. The revised date for the submittal of the draft final Parcel D PP is now April 21, 1997.

Record of Decision (ROD): The Navy submitted the revised Parcel B ROD to the regulatory agencies on January 24, 1997. The final Parcel B ROD has been delayed to allow the preparation of a technical memorandum which includes a facility wide hydrogeologic model and contaminant concentration maps that was requested by the regulatory agencies. To allow for preparation and review of this technical memorandum, the BCT has mutually agreed to the delay final Parcel B ROD. The revised date for the submittal of the final Parcel B ROD is still under discussion by the BCT.

Removal Actions

Exploratory Excavations: Exploratory excavation removal activities under the original scope of work were completed in February, which included excavation, sampling, backfilling, and paving. The construction summary report is being reviewed by the Navy.

IR-1/21 Industrial Landfill Groundwater Plume: The test section of sheet piling was installed at this site with little obstruction and the proposed soil and groundwater sampling completed. The results of the test installation are being used in the design of the sheet piling portion of the removal action.

IR-3 Waste Oil Ponds: Soil and groundwater sampling along the proposed sheet pile wall was completed. Several test piles were driven but many, large obstructions were encountered at IR-3. The IR-3 sheet pile wall alignment will likely be offset or the obstructions excavated in the final design. The results from this test are being evaluated and will be used to finalize the sheet piling alignment.

Storm Drains: Work continued through the current report period. Removal of sediments from the storm drain lines commenced on October 17, 1996, and by the end of February, three of the ten storm drain basins had been cleaned of sediment. The volume of sediment removed from these three storm drain basins is estimated to represent almost 50% of total sediment volume to be removed from the storm drain lines. Most sections of the storm drain lines require several passes of the cleaning equipment to remove all loose material. The work will continue for approximately 3 months depending on field conditions.

Tank Farm (IR-6): Removal action work in the tank farm consists of excavating metals and polychlorinated biphenyl (PCB) contaminated soil from the tank farm bermed area 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 was reviewed and modified as appropriate. The contracting for the excavation required modification to allow the use of the Remedial Action Contractor since the Public Works Center is closing in April 1997 and will be unable to complete the work. Currently, the excavation is proposed to be included as part of the exploratory excavation removal action contract with

International Technology Corporation and is expected to take place in April 1997. A treatability study addressing bioremediation is being conducted concurrently with the soil removal and was expected to be completed in January 1997. As a result, the preliminary draft is now expected to be submitted in March 1997.

Ecological Risk Assessment Phase 1B

The Navy is preparing responses to comments received on the draft phase 1B ecological risk assessment report which are due on March 17, 1997. As was previously discussed in the January monthly progress report, the Navy will not finalize the draft final Phase 1B Ecological Risk Assessment but will use these resources to move ahead on the Parcel F FS. A proposed schedule by the Navy for the Parcel F FS, PP, and ROD will be submitted at the same time as the response to comments. A meeting to discuss the scope of the Parcel F FS will be arranged in April after the submittal of the response to comments.

Radiation Issues

The Navy is still attempting to obtain the documentation requested by the EPA in their response to the draft final Phase III Radiation Investigation Work Plan which was submitted on October 13, 1996. Since the issue concerns only one of the multiple sites proposed for screening, the Navy has proceeded with field work on these other sites while resolving this one issue. The Navy began 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.

The Navy is continuing the field work for the Phase III radiation investigation as mentioned in the fieldwork section above. The field screening of all of the NRDL sites has been completed and the sampling of those anomalous areas found at Buildings 707, 364, and behind former Building 506 remains to be completed. The results from the Phase III radiation investigation will be reported in an appendix in the Parcel E RI report.

Radiation-related field activities conducted during February 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 subcontractor. The characterization data from the surveying and sampling of drums and bins of IDW in September has been analyzed and evaluation of the data does not indicate any radioactive contamination other than in two drums containing radium dials and decontamination water. Following authorization for release, which is expected in March 1997, the IDW will be transported off site for proper disposal.

2. MEETINGS AND REPORTS SUBMITTED

Meetings in February 1997

Meetings of the BCT/remedial project manager (RPM) meetings were held on February 13 and 24, 1997. Additionally, conference calls were held on February 18 and 27, 1997.

A Restoration Advisory Board (RAB) meeting was held on February 26, 1997. This RAB meeting consisted of: (1) presentation on the human health risk assessment process by Dr. Dan Stralka of the EPA, and (2) a presentation concerning the status of the ongoing removal actions at HPS by PRC.

Documents Submitted in February 1997

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

- Draft Parcel C FS
- Revised HPS BRAC Closure Plan
- Response to Comments on the Draft Final Parcel D RI Report

3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

Facility-wide Hydrogeologic Conceptual Model

In a meeting of the BCT on February 13, 1997 EPA and DTSC stated that they did not feel comfortable finalizing the Parcel D PP or Parcel B ROD until they had a better understanding of the groundwater conditions and contamination across the facility. To obtain this foundation of knowledge they requested that the Navy provide a technical memorandum describing the facility-wide hydrogeologic conceptual model along with maps depicting the hydrogeology and contaminant plumes. In addition they requested a copy of the summary of DNAPL evaluation focusing on the need for interim removal actions which had been performed by the Navy as part of the preliminary RI work. By mutual agreement of the BCT the preparation of the decision documents for Parcels B and D would be halted while the technical memorandum was being prepared. As a result of the redirection of resources for the technical memorandum, the schedule for the preparation of documents for Parcel D and E has been delayed by one month and two months, respectively.

Following submittal of the technical memorandum, which is due on March 18, 1997, the agencies plan on reviewing the information and meeting with the Navy on April 3, 1997. At that meeting, the BCT will discuss the technical memorandum and identify any impacts to remedial actions planned for the site, as well as if further information is required and if so, the scope and potential project schedule impacts.

Petroleum-Only Sites at Hunters Point Shipyard (HPS)

The petroleum-only sites at HPS are being addressed as part of the Navy's voluntary corrective action plans (CAP) for petroleum contamination. 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 Air Force Army Construction, Incorporated. Initial evaluation of the field sampling indicates that another set of samples will be needed to provide samples with a gasoline component. A proposed sample location for the additional set of samples was selected and sampled in February. A meeting has been scheduled between the Navy and the Regional Water Quality Control Board (RWQCB) on March 3, 1997, to go over the general approach for the CAPs and preliminary results for the first set of bioassays from the December 1996 sampling.

Scope of the Basewide Remedial Investigation (RI) Report

As was discussed in the previous monthly progress reports, the resolution of the possible need for a basewide ROD to document currently ongoing activities, such as removal actions and data gaps, that can not be included in their parcel-specific RI/FS studies due to schedule agreements. The BCT sees the possible need for a basewide ROD to document these actions completed after a particular parcel-specific

ROD (which normally contains the necessary documentation). As such, the suggested approach was to remove the base wide RI/FS/ROD from the Parcel E Federal Facilities Agreement (FFA) schedule and include it, if it is required, as part of the Parcel F FFA schedule which is to be proposed with the response to comments on the draft Ecological Risk Assessment Phase 1B report on March 17, 1997.

4. REPORTS AND ACTIVITIES FOR MARCH 1997

Documents Scheduled for Submittal in March 1997

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

- Facility-wide Hydrogeologic Conceptual Model Technical Memorandum
- Draft Final Parcel A FOST (tentatively)
- Draft Final Parcel C RI report
- Responses to Comments for the Draft Phase 1B Ecological Risk Assessment
- Draft Final Construction Summary Report of Pickling and Plate Yard Removal Action

Activities Planned for March 1997

Removal Actions: Continue work at IR 1/21, IR-3, and IR-6. Continue planning for the removals at the Tank Farm as part of the exploratory excavations initiated in August 1996. Continue field work on the storm drain removal action began in September 1996.

Meetings: Attend the meeting between the Navy and RWQCB to discuss the approach for the CAPs and preliminary bioassay results scheduled for March 3, 1997 along with the BCT/RPM meeting scheduled for March 13, 1997. Attend the RAB meeting scheduled for March 26, 1997.

Radiation Issues: Continue the screening of Naval Radiological Defense Laboratory sites. 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 preparation of the Parcel D PP, after resolution of the BCT's issues to be addressed by the preparation of the facility-wide hydrogeologic conceptual model technical memorandum.

Draft ROD Document: Continue preparation of the Parcel B ROD after resolution of the BCT's issues to be addressed by the preparation of the facility-wide hydrogeologic conceptual model technical memorandum. Continue preparation of the preliminary draft Parcel D ROD.

BCT Activities: Prepare for the monthly BCT/RPM meeting.

5. KEY PERSONNEL CHANGES

The Navy's new community relations support contractor, Gutierrez-Palmenberg, Inc., began their support for the RAB in February.

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

Draft Final Parcel B ROD: Currently on hold until the BCT has reviewed the technical memorandum regarding the facility wide hydrogeologic conceptual model which is to be submitted on March 18 and discussed in a meeting April 3, 1997. Subsequent to those actions a revised submittal date will be agreed upon by the BCT.

Parcel C Reports

Draft Parcel C RI Report: Submitted to agencies on November 29, 1996. Agency comments received on January 27, 1997. The response to the agencies comments along with the draft final Parcel C RI report are due 45 days later on March 13, 1997.

Draft Parcel C FS Report: Submitted to the agencies on February 27, 1997. Agency review period is 45 days with comments due on April 13, 1997.

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 were addressed in a separate attachment, which was submitted on February 25, 1997.

Draft Final Parcel D FS Report: Submitted to the agencies on January 24, 1997. Agency comments on the document are due in 30 days on February 24, 1997. Verbal notification has been received from the regulatory agencies that written comments are forthcoming.

Parcel D Proposed Plan: Currently on hold until the BCT has reviewed the technical memorandum regarding the facility wide hydrogeologic conceptual model which is to be submitted on March 18 and discussed in a meeting April 3, 1997. A revised submittal date of April 21, 1997 has been agreed to by the BCT to accommodate the regulatory agencies concerns regarding the final remedial action.

Parcel E Reports

Draft Parcel E RI Report: Originally scheduled for submittal to agencies on April 29, 1997. As a result of the regulatory agencies' request for a technical memorandum presenting the facility-wide hydrogeologic conceptual model, the submittal of all of the Parcel E documents has been delayed by one month. The revised submittal date for the Parcel E RI report is May 29, 1997. Agency review period is 45 days with comments due on July 14, 1997.

Parcel F Reports

Draft Phase 1B Ecological Risk Assessment Report: The Navy received comments on the Draft Phase 1B Ecological Risk Assessment Report from the regulatory agencies on December 30, 1996. As a result of the extensive nature of the regulatory comments and the desire to incorporate some of the suggestions into a subsequent FS the submittal date has been extended 30 days from the original date of February 14, 1997. The new submittal date is March 17, 1997.

Multiparcel/Facility-Wide Investigation Reports

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.

HPS BRAC Closure Plan: The internal draft for the Navy was submitted on February 21, 1997 with distribution to the regulatory agencies and RAB in March, 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. As a result of ongoing discussions between the Navy and the regulatory agencies the responses are scheduled to be submitted in March 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 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

BCT	BRAC Cleanup Team
BRAC	Base Realignment and Closure
Cal/EPA	California Environmental Protection Agency, Department of Toxic Substances Control
CAP	Corrective Action Plan
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act Of 1980
DHS	State Of California Department of Health Services
DTSC	Department of Toxic Substances Control
EPA	U.S. Environmental Protection Agency
FFA	Federal Facilities Agreement
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
RI	Remedial Investigation
ROD	Record of Decision
RPM	Remedial Project Manager
RWQCB	Regional Water Quality Control Board



Richard Powell
Lead Remedial Project Manager



Date