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15 Apr 1997

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

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

Encl: (1) March 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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RAB Member: Ms. Janet Ellis
RAB Member: Labor Neighbor (Attn: Ms. Laurie Espinoza)
RAB Member: Mr. Manual J. Ford
RAB Member: Innes Avenue Coalition (Attn Ms. Jill Fox)
RAB Member: Hillside Homeowners (Attn: Ms. Bonnie Fraenza)
RAB Member: ROSES (Attn: Mr. Greg Freeman)
RAB Member: Lawyers Com. Civil Rights (Attn: Mr. Michael Harris)
RAB Member: Forest Hill Association (Attn: Mr. James A. Heagy)
RAB Member: Mr. David E. Jackson
RAB Member: All Hallows Tenants Association (Attn: Ms. Helen Jackson)
RAB Member: Third Street Task Force (Attn: Ms. Henrietta Jones)
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RAB Member: Mr. Anthony LaMell
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RAB Member: ARC Ecology (Attn: Ms. Christine Shirley)
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RAB Member: Mayor's Hunters Point Shipyard Citizens Advisory Committee
(Attn: Mr. Leon Thibeaux)
RAB Member: All Hallows Young Ladies #182 (Attn: Ms. Erlinda B. Villa)
RAB Member: Ms. Caroline Washington
RAB Member: Senior Citizen Bayview (Attn: Mrs. Osceola Washington)
RAB Member: Mr. Nathaniel White III
RAB Member: San Francisco Enterprise (Attn: Mr. Andre Williams)
RAB Member: Mayor's Hunters Point Shipyard Citizens Advisory Committee
(Attn: Mr. Alfred Williams)
RAB Member: Shoreview Residents Association (Attn: Ms. Patricia Wright)
RAB Member: Mr. Mark Youngkin

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**INSTALLATION RESTORATION PROGRAM
MONTHLY PROGRESS REPORT**

MARCH 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, including the Phase III Radiation Investigation, has been completed for Parcels B, C, D, and E. The Phase III Radiation Investigation surveyed those buildings formerly used by the Naval Radiological Defense Laboratory which were missing decommissioning documentation issued by the Nuclear Regulatory Commission. The Phase III field screening began in mid- January and was completed in March.

Routine waste management tasks were performed during March, 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 of additional questions received from the City and County of San Francisco regarding lead-based paint concerns in Parcel A. Discussions concerning this issue are still ongoing and the submittal date has not been 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 Department of Toxic Substances Control (DTSC) has verbally informed the Navy that additional comments may be forthcoming on these responses.

The draft final Parcel C RI report, including responses to comments, was submitted on March 13, 1997. The Parcel C RI report will become final on April 14, 1997, 30 days after submittal, unless written comments are received from the regulatory agencies. The U.S. Environmental Protection Agency (EPA) has verbally informed the Navy that an extension may be required for additional comments. Progress is ongoing in the preparation of the draft Parcel E RI report.

Feasibility Study (FS) Reports: The draft final Parcel D FS, including responses to comments, was submitted to the regulatory agencies on January 24, 1997. The 30 day review period ended on February 24, 1997. The Navy has not received written notice from the regulatory agencies regarding any items for dispute resolution; however, DTSC and 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 regulatory agencies have stated that they would try to respond by April 8, 1997.

The draft Parcel C FS report was submitted on February 27, 1997. The review period for this document is 45 days, and will end on April 13, 1997. EPA has verbally informed the Navy that an extension for review will be requested. Preparation of the draft Parcel E FS report has begun.

Proposed Plan (PP): The Navy submitted the preliminary draft Parcel D PP on January 15, 1997. The draft final PP for Parcel D was delayed due to a request by the regulatory agencies for a technical memorandum describing a facility-wide hydrogeologic model and contaminant concentration maps. The technical memorandum was submitted to the regulatory agencies on March 18, 1997 and is currently being reviewed. To allow for the preparation and review of this technical memorandum, the Base Realignment and Closure (BRAC) Cleanup Team (BCT) 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 was delayed due to a request by the regulatory agencies for a technical memorandum describing a facility-wide hydrogeologic model and contaminant concentration maps. The technical memorandum was submitted to the regulatory agencies on March 18, 1997 and is currently being reviewed. To allow for the preparation and review of this technical memorandum, the Base Realignment and Closure (BRAC) Cleanup Team (BCT) agreed to the delay of the final Parcel B ROD. The revised date for the submittal of the final Parcel B ROD is still under discussion by the BCT, however a target date of May 12, 1997 has been proposed.

Removal Actions

Exploratory Excavations: Exploratory excavation removal activities outlined in the original scope of work were completed in February, and included excavation, sampling, backfilling, and paving. The draft construction summary report is undergoing Navy's review.

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 was completed. The results of the installation test were used in the design of the sheet piling portion of the removal action which is currently under review.

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 were evaluated and used to finalize the sheet piling alignment which is currently being reviewed.

Storm Drains: Work continued through the current report period. Removal of sediments from the storm drain lines commenced on October 17, 1996, and is expected to be completed by the end of July 1997. An update on the progress of the removal was presented to the BCT on March 13, 1997. Some sections of the storm drains in Parcel E will not be cleaned because they are submerged during low tide or because they are difficult to dewater due to high infiltration rates.

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 (RAC) since the Public Works Center (PWC) 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 and the RAC contractor is expected to perform the removal in April 1997. A treatability study addressing bioremediation is being conducted by PWC concurrently with the soil removal and was expected to be completed in January 1997. As a result of the need for some additional sampling, the preliminary draft treatability study is currently in review and is expected to be submitted in April 1997.

Ecological Risk Assessment Phase 1B

The Navy submitted responses to comments received on the draft phase 1B ecological risk assessment report 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 and will use these resources to move ahead on the FS for Parcel F. A proposed schedule for the delivery of the Parcel F FS, PP, and ROD was submitted along with the response to comments. A meeting to discuss the responses to comments and the scope of the Parcel F FS is scheduled for April 10, 1997.

Radiation Issues

The Navy is still attempting to obtain the documentation requested by the and 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 has completed 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 and the sampling of those anomalous areas found at Buildings 707, 364, and behind former Building 506 has been 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 March consisted of the off site disposal of the IDW which was screened and found to have no radiological contamination. The only remaining IDW from IR-01 and IR-02 consists of two drums containing radium dials and decontamination water. The radiologically contaminated material is expected to be disposed of off site by RASO's radiation subcontractor in May, 1997.

2. MEETINGS AND REPORTS SUBMITTED

Meetings in March 1997

Meetings of the BCT/remedial project manager (RPM) meetings were held on March 13, 20 and 24, 1997.

A Restoration Advisory Board (RAB) meeting was held on March 26, 1997. This RAB meeting consisted of: (1) a continuation from last month's RAB of the presentation on the human health risk

assessment process by Dr. Dan Stralka of EPA, and (2) a presentation summarizing the Parcel C RI results and the draft Parcel C FS report by representatives of the Navy and the Navy's contractors PRC and Levine Fricke Recon.

Documents Submitted in March 1997

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

- Facility-wide Hydrogeologic Conceptual Model Technical Memorandum
- Draft Final Parcel C RI Report
- Response to Comments on the Draft Phase 1B Ecological Risk Assessment Report

3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

Facility-wide Hydrogeologic Conceptual Model

In a BCT meeting held on February 13, 1997, representatives from 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 a DNAPL evaluation previously prepared by PRC (October 1996 which focused on the potential need for interim removal actions. By agreement of the BCT members, the preparation of the decision documents for Parcels B and D were 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 were delayed by one and two months, respectively.

The technical memorandum was submitted on March 18, 1997 and is currently being reviewed by the regulatory agencies. A meeting scheduled for Navy on April 3, 1997 will discuss the information presented in the technical memorandum and identify any impacts to remedial actions planned for the site. Also a discussion on whether further information is required will be held, and if so, the scope and potential project schedule impacts will be addressed.

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 late spring 1997. Field sampling for bioassays began December 16, 1996. This work is being performed by AFA Construction, Incorporated. Initial evaluation of the field sampling indicates that another set of samples was 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 was held 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 the preliminary results for the first set of bioassays from the December 1996 sampling. At that meeting, the RWQCB requested that the Navy conduct an additional type of bioassay test using *mysidopsis bahia*

(mysid shrimp) to determine the toxicity of the TPH. After a follow up conference call between the Navy and RWQCB on March 6, 1997 the Navy agreed to conduct the testing and will prepare a sampling plan. The proposed sampling for the additional testing is expected to take place in April.

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 is ongoing. 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 separate the submittal of the basewide 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.

4. REPORTS AND ACTIVITIES FOR APRIL 1997

Documents Scheduled for Submittal in April 1997

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

- Draft Final Parcel A FOST (tentatively)
- Draft Parcel D Proposed Plan
- Draft Final Construction Summary Report of Pickling and Plate Yard Removal Action

Activities Planned for April 1997

Removal Actions: Continue work at IR 1/21, IR-3, and IR-6. Continue field work on the storm drain removal action began in September 1996.

Meetings: Attend the meeting between the Navy and regulatory agencies to discuss the approach for the Parcel F FS report scheduled for April 10, 1997. Attend the BCT/RPM meeting scheduled for April 7, 1997. Attend the RAB meeting scheduled for April 23, 1997.

Radiation Issues: 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 Draft 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

Cyrus Shabahari, DTSC's BCT representative, has left the project for a 6 month leave of absence and has been replaced by Mr. Chien Kao.

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 was submitted on March 18 and will be discussed in a meeting on April 7, 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 was submitted on March 13, 1997. Following a 30 day review period the document will become final on April 14, 1997 unless comments are received.

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. The regulatory agencies are still evaluating the comments and are expected to respond at the April 7, 1997 BCT/RPM meeting.

Draft Final Parcel D FS Report: Submitted to the agencies on January 24, 1997. Agency comments on the document were due in 30 days on February 24, 1997. Verbal notification has been received from the regulatory agencies that written comments are forthcoming and will be submitted by April 8, 1997.

Parcel D Proposed Plan: Currently on hold until the BCT has reviewed the technical memorandum regarding the facility wide hydrogeologic conceptual model which was submitted on March 18 and will

be discussed in a meeting on April 7, 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 document was submitted on March 17, 1997 and will be further discussed in a meeting scheduled for April 10, 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 revised HPS BCP (Revision 03) was distributed to the regulatory agencies and the RAB on March 7, 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 continuing discussions between the Navy and the regulatory agencies the responses are now scheduled to be submitted in April 1997.

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

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

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

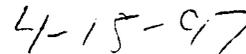
Draft Construction Summary Report of Storm Drain Sediment Removal Action: To be prepared following completion of this removal action.

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