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

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

Encl: (1) April 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.

Originated by:

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By direction of
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ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS
POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

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(Attn: Mr. Alfred Williams)
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**INSTALLATION RESTORATION PROGRAM
MONTHLY PROGRESS REPORT**

APRIL 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 has been completed for all parcels, with the exception of small sampling efforts to fill those data gaps noted in the individual Parcel RI reports. The document for the first of these data gap samplings, the Parcel B Data Gap field sampling and analysis work plan, has been submitted to the Base Realignment and Closure (BRAC) Cleanup Team (BCT) for review. Following the review period and subsequent response to agencies comments, the field work will be implemented. The field effort is expected to take approximately 4 to 6 weeks.

Routine waste management tasks were performed during April, 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 is still delayed due to 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 yet 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. This submittal completed the Parcel D RI report.

The draft final Parcel C RI report, including responses to comments, was submitted on March 13, 1997. Written comments on the draft final Parcel C RI report were received from the U.S. Environmental Protection Agency (EPA) on April 15, 1997 and the Navy was verbally informed by the Department of Toxic Substances Control (DTSC) that comments from them were forthcoming.

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. Approval of the Parcel D FS by the agencies was delayed until the facility-wide groundwater issues were resolved. EPA provided written approval of

the draft final Parcel D FS along with written comments on April 17, 1997. The Navy will provide a response to EPA's comments and that submittal will complete the Parcel D FS.

The draft Parcel C FS report was submitted on February 27, 1997. The original review period for this document was 45 days, ending on April 13, 1997. The regulatory agencies requested a 30 day extension of the review period which is available under the Federal Facilities Agreement (FFA). The review period will end on May 14, 1997. Preparation of the draft Parcel E FS report continues. The initial scoping and preparation of the Parcel F FS, which follows the submittal of the Draft Ecological Risk Assessment Phase 1B, has also begun.

Proposed Plan (PP): The draft final Parcel D PP was submitted to the regulatory agencies on April 21, 1997. The Navy will respond to the agencies suggested revisions and issue the document to the public on May 6, 1997 for their review and comment.

Record of Decision (ROD): The Navy submitted the revised Parcel B Record of Decision (ROD) to the regulatory agencies on January 24, 1997. The final Parcel B ROD was delayed due to request of a technical memorandum describing a facility-wide hydrogeologic model and contaminant concentration maps by the regulatory agencies. 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 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 May 12, 1997 is considered the target date. This due date is contingent on resolution of issues.

Removal Actions

Exploratory Excavations: Exploratory excavation removal activities outlined in the original scope of work were completed in February 1997. The draft construction summary report is currently being prepared and undergoing Navy's review.

IR-1/21 Industrial Landfill Groundwater Plume: Design plans are currently being finalized. A pre-construction meeting is scheduled in May.

IR-3 Waste Oil Ponds: Design plans are currently being finalized. A pre-construction meeting is scheduled in May.

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.

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. The contracting for the excavation required modification to allow the use of the Remedial Action Contractor (RAC) since the Public Works Center (PWC) closed in April 1997 and will be unable to complete the work. The excavation is now included as part of the exploratory excavation removal action contract. The RAC contractor was expected to begin the removal in April 1997 but, due to contractual delays, the work will begin in May. Due to a delay in receiving the analytical data, the preliminary draft treatability study addressing bioremediation is now expected in May 1997.

Ecological Risk Assessment Phase 1B/ Parcel F Feasibility Study

As noted in previous monthly progress reports, the Hunters Point Shipyard BCT agreed that the Navy will not finalize the draft final Phase 1B Ecological Risk Assessment and will use those resources to move ahead on the FS for Parcel F. A meeting to discuss the responses to comments to the Ecological Risk Assessment Phase 1B and the scope and schedule of the Parcel F FS was held on April 10, 1997. At this meeting the schedule for submittal of the draft and draft final Parcel F FS on October 5, 1997 and December 5, 1997 was discussed, along with the approach for responding to the agencies' comments on the ecological risk assessment within the FS. It was agreed that two meetings would be held between the Navy and the regulatory agencies on May 15, and July 1, 1997 to discuss two aspects of the Parcel F FS; the areas to be addressed within the FS and to present the preliminary remedial alternatives to be evaluated. In future monthly progress reports, the progress of this FS will be discussed under the FS reports section.

Radiation Issues

The Navy will provide a response to regulator comments on the draft final Phase III Radiation Investigation Work Plan in May 1977. As stated in the previous monthly progress report, the field work has been completed for the Phase III radiation investigation. The results will be reported in an appendix in the Parcel E RI report..

Radiation-related field activities conducted during April consisted of the waste management of two drums containing radium dials and decontamination water and IDW generated by the field work for the Phase III Radiation Investigation. The radiological IDW is expected to be disposed of off site by Radiological Affairs Support Office (RASO's) radiation subcontractor. The non-radiological IDW generated from field screening in the sump behind Building 364 (consisting of a Baker tank with the water pumped from the sump) will be disposed of in May.

2. MEETINGS AND REPORTS SUBMITTED

Meetings in April 1997

A meeting of the BCT/remedial project manager (RPM) was held on April 7, 1997. Additionally a meeting between the Navy and the regulatory agencies to discuss the Parcel F FS was held on April 10, 1997.

A Restoration Advisory Board (RAB) meeting was held on April 23, 1997. This RAB meeting consisted of a presentation summarizing the removal actions ongoing at HPS by the Navy and their contractor PRC and an update on the status of the Parcel B ROD and the facility-wide groundwater condition issue given by EPA's BCT representative, Claire Trombadore.

Documents Submitted in April 1997

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

- Draft Data Gaps Sampling and Analysis Work Plan for Parcel B
- Draft Final Parcel D Proposed Plan

- Addendum to Ecotoxicological Testing Field Sampling and Analysis Plan

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 dense non-aqueous phase liquid (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 was held on April 7, 1997 discussing the information presented in the technical memorandum and no impacts to remedial actions planned for the site were identified. Further information consisting of enlarged portions of those maps depicting DNAPLs sites were requested by the agencies, however no potential project schedule impacts beyond those previously identified are expected.

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 originally due in April 1997. The schedules for the Parcel B, D, C and E CAPs will be revised to reflect the additional sampling being requested by the Regional Water Quality Control Board (RWQCB). As was discussed previously, field sampling for bioassays began in December 1996 with the work being performed by Air Force Army Construction, Incorporated (AFA). Currently two types of bioassays have been conducted using soil samples collected from the site. Subsequent to that sampling effort the RWQCB requested that the Navy conduct an additional type of bioassay test using mysidopsis bahia (mysid shrimp) in groundwater samples to determine the toxicity of total petroleum hydrocarbons (TPH). The Navy agreed and submitted a sampling plan for this work on April 11, 1997. The proposed sampling for the additional testing began on April 28, 1997 and is expected to be completed in May.

Scope of the Basewide Remedial Investigation (RI) Report

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 followed the approach first proposed in last months monthly progress report. The approach, which was slightly modified, was to separate the submittal of the basewide RI/FS/ROD from the Parcel E FFA schedule and include it, if it is required, as a separate FFA schedule. This schedule will be included in the next revision of the FFA schedules.

4. REPORTS AND ACTIVITIES FOR MAY 1997

Documents Scheduled for Submittal in May 1997

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

- Draft Final Parcel A FOST (tentatively)
- Final Parcel B ROD
- Response to Comments on the Final Parcel C RI Report (tentatively)
- Final Parcel D Proposed Plan
- Draft Parcel E RI report
- Draft Construction Summary Report of Exploratory Excavation Removal Action

Activities Planned for May 1997

Removal Actions: Continue work at IR-1/21, IR-3, IR-6, and IR-50. Begin work on IR-57 (Dry Dock 4).

Meetings: Attend the meeting between the Navy and regulatory agencies to discuss the areas for the Parcel F FS report scheduled for May 15, 1997. Attend the BCT/RPM meeting scheduled for May 6, 1997. Attend the Parcel D Proposed Plan Public meeting scheduled for May 21, 1997. Attend the RAB meeting scheduled for May 28, 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 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, Parcel C FS report, and Parcel F FS report.

Proposed Plan: Continue preparation of the Final Parcel D PP for public review and comment in May.

Draft ROD Document: Continue preparation of the Final Parcel B ROD. Continue preparation of the preliminary draft Parcel D ROD.

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

5. KEY PERSONNEL CHANGES

Ryan Brooks, PRC's community relations representative to the Hunters Point Shipyard RAB has left PRC and joined the Navy at EFA West as part of their community relations staff supporting RABs in the San Francisco Bay area.

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: The previous hold on the Parcel B ROD has been removed although some issues still need to be resolved. Subsequent to those actions a revised submittal date will be agreed upon by the BCT. The current target date is May 12, 1997.

Data gaps Sampling and Analysis Work Plan for Parcel B: Submitted to the agencies on April 25, 1997. Agency review period to be determined.

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. Written comments on the draft final Parcel C RI report were received from the EPA on April 15, 1997 and the Navy was verbally informed by DTSC that comments from them were forthcoming.

Draft Parcel C FS Report: Submitted to the agencies on February 27, 1997. At the request of the agencies the review period has been extended 30 days with comments due on May 14, 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. This submittal completed the Parcel D RI report.

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. The Navy did not receive written notice from the regulatory agencies regarding any items for dispute resolution; however, DTSC and EPA did send letters to the Navy dated February 26, 1997 and February 28, 1977, respectively, in which they deferred approval of the Parcel D FS until after the resolution of the facility-wide groundwater issues. The EPA provided written approval of the draft final Parcel D FS along with written comments on April 17, 1997. The Navy will provide a response to EPA's comments, and that submittal will complete the Parcel D FS report

Parcel D Proposed Plan: The previous hold has been removed and the document was submitted to the agencies for review on April 21, 1997. The current submittal date for public review and comment is May 6, 1997, with a public comment period of 30 days extending from May 11 to June 10, 1997.

Draft Parcel D ROD: The current submittal date for the draft Parcel D ROD is targeted for May 19, 1997, although some issues need to be resolved. Agency review period is 30 days with comments due on June 18, 1997.

Parcel E Reports

Draft Parcel E RI Report: The current 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.

Draft Parcel E FS Report: The submittal date for Parcel E FS report is August 28, 1997. Agency review period is 45 days with comments due on October 13, 1997.

Parcel F Reports

Draft Phase 1B Ecological Risk Assessment Report: This document is now considered complete with the submittal of the response to comments on March 17, 1997.

Draft Parcel F FS Report: The proposed submittal date for the Parcel F FS report is October 5, 1997. Agency review period is 45 days with comments due on November 19, 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, the Navy will submit response to comments received from Cal/EPA and comments received from U.S. EPA on the Draft Phase III Radiation Investigation Field Work Plan in May 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 previously stated discussions are ongoing between the Navy and the regulatory agencies and the responses are now scheduled to be submitted in May 1997.

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

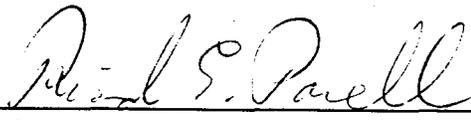
Draft Construction Summary Report of IR-1/21 Groundwater Removal Action: To be prepared following completion of this removal action.

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
DNAPL	Dense Non-aqueous Phase Liquid
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
PWC	Public Works Center
RAB	Restoration Advisory Board
RAC	Remedial Action Contract
RASO	Radiological Affairs Support Office
RI	Remedial Investigation
ROD	Record of Decision
RPM	Remedial Project Manager
RWQCB	Regional Water Quality Control Board
TPH	Total Petroleum Hydrocarbons


Richard Powell
Lead Remedial Project Manager

5-14-97
Date