



DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY, WEST
NAVAL FACILITIES ENGINEERING COMMAND
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ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA
Encl: (1) August 1998 Monthly Progress Report (MPR)

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HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

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MONTHLY PROGRESS REPORT

AUGUST 1998

NAVAL FACILITIES ENGINEERING COMMAND

HUNTERS POINT SHIPYARD

1. PROGRESS DURING THE REPORT PERIOD

The Hunters Point Shipyard (HPS) 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

The remedial investigation fieldwork 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.

Additional field work which remains from the initial Parcel B data gap field effort consists (1) the collection of a groundwater sample from the monitoring well in Installation Restoration Site (IR)-10 which had encountered volatile organic compounds (VOCs) in the remedial investigation, (2) an additional phase of the infiltration study, and (3) additional sampling on the off-site property adjacent to IR- 07 and 18 to determine the extent of contamination and possible migration. Additionally the two new groundwater monitoring wells in the B-aquifer which had been installed were sampled in July as was noted in the previous monthly progress report.

The sample to be collected from IR-10 (as was discussed in the Parcel B Record of Decision) is still awaiting collection as discussed in last month's progress report. As soon as the soil remaining from the IR-6 soil removal, which is obstructing access, is moved from Building 123 the sample will be collected. Comments have been received on the results of the infiltration study that was submitted to the BRAC Closure Team (BCT) in April. As a result of those comments, a revised approach with additional sampling will be proposed to the BCT with fieldwork to be conducted later in the field season. The off-site work adjacent to IR-7 and IR-18 still remains to be completed. An effort involving earthwork to construct a drilling pad or use of another drill rig has been delayed due to equipment availability as well as access difficulties due to construction activities by the property owner and is now tentatively scheduled for September.

Routine waste management tasks were performed during August, primarily consisting of inspecting tank and bin locations and the decontamination pad.

Remedial Investigation (RI) Documents

Remedial Investigation Reports: The draft Parcel E Validation Study Work Plan and Field Sampling Plan was submitted July 22, 1998 and a meeting was held on August 4, 1998 to discuss comments from the regulatory agencies on the work plan. At that meeting it was agreed that the approach was adequate to begin field sampling while the draft final version of the work plan was being prepared to allow the collection of vegetation and tissue samples in the current sampling season and avoid delay until next

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year. As was noted in previous progress reports, the results of the validation study will be incorporated in the draft final Parcel E Feasibility Study.

Preliminary draft responses to comments on the draft final Parcel E RI report were submitted on March 10, 1998. A meeting was held on August 18, 1998 between the Navy and the BCT to discuss comments on the draft Parcel E Feasibility Study and the draft Final Parcel E RI. The Parcel E RI will be considered complete once the response to comments on the draft Final Parcel E RI report are finalized and the results of the validation study have been published. The approach to the response to comments on the draft final Parcel E RI was discussed at the meeting and those responses will be submitted in September. The Parcel E RI is the last RI scheduled for HPS.

Feasibility Study (FS) Reports: The draft final Parcel C FS was submitted on July 15, 1998. The period of review was extended at the request of the BCT; comments were received from the U.S. Environmental Protection Agency (EPA) on August 27, 1998 and from the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) and the San Francisco Bay Regional Water Quality Control Board (RWQCB) on August 31, 1998. The Navy is currently reviewing the scope of the comments to determine if an extension beyond the usual 30 day period will be required to adequately address them.

The draft Parcel E FS was submitted on January 15, 1998. A date will be determined for submission of the Navy's response to comments on the draft Parcel E FS after the Technical Memorandum for Parcels E/F Remediation Integration has been issued at the end of September. The submittal date for the draft final Parcel E FS is April 19, 1999.

The draft Parcel F FS was submitted on April 3, 1998. As was stated in the last monthly progress report, the period of review for this document was extended until June 18, 1998 at the request of the regulatory agencies. Comments were received from several of the regulatory agencies; however, comments are still outstanding from some reviewers, including the City of San Francisco. The Navy still continues to review the scope of the comments received as well as which comments are outstanding to determine the time necessary to respond. The original schedule for the submittal of the draft final was August 3, 1998; however, due to the extended review period, along with concerns regarding the issues that appear to be interconnected with those expressed in the Parcel E FS, that date had to be changed. Following the completion of a technical memorandum by the Navy evaluating the integration of the remedial alternatives in Parcel E and F the schedule for the submittal of the draft final Parcel F FS will be revised. In addition to the previous factors, the proposed submittal of primary documents for Parcel C during the same time period has caused concern among the regulatory agencies about the proposed schedules.

Proposed Plan (PP): Submission dates for the draft PPs are currently September 18, 1998 for Parcel C and October 2, 1998 for Parcel F but will have to be revised due to various issues raised in the FS documents which need to be addressed. The submission date for the Parcel E Draft PP is July 5, 1999.

Record of Decision (ROD): The revised schedule for the Parcel D ROD continues to be discussed at the BCT/Remedial Project Managers (RPM) meetings. In the August 6, 1998 meeting several issues were discussed that still need resolution. Since there are still outstanding issues for the Parcel D ROD that will require additional time to resolve the Navy has now proposed October 13, 1998 as the date for the submittal of the Draft Final Parcel D ROD. The revised schedule and issues will be discussed at the next BCT/RPM meeting which is to be held on September 10, 1998.

Remedial Design Documents: The remedial design and remedial action documents for Parcel B have overlapping submittal and review cycles due to the accelerated schedule for the cleanup.

A portion of the Parcel B Remedial Design (RD) documents which addresses the confirmation sampling, the Remedial Action Confirmation Sampling and Analysis Plan, has raised issues which have been discussed by the BCT. As was discussed in previous monthly progress reports, several meetings were held to discuss issues regarding the sampling approach and issues regarding the quality assurance project plan. As a result of additional discussions in July and August, a revised approach and responses to the written comments will now be submitted in early September.

The Parcel B draft final Remedial Action (RA) Documents were submitted on June 25, 1998. EPA expedited their review of the submitted documents and agreed on June 30, 1998 that they could support the beginning of the fieldwork in July. The written responses to the agencies' comments were submitted in August which completes the Remedial Action Documents for Parcel B with the exception of addendums for fuel line removal and storm drain work to be submitted for review at a later time.

Preparation of the Parcel D preliminary RD documents continues.

Remedial Action Implementation

The remedial action in Parcel B began on July 14, 1998 with excavation commencing in IR-7, IR-18 and IR-60. Excavations were started in various "de minimus areas" (small isolated areas of contamination) and in the larger remedial action areas. By the end of August, approximately 22 of a total of 26 de minimus areas and remedial action areas had been excavated to the boundaries proposed in the remedial design. Of these original 26 areas 18 will require overexcavation to "chase" the contamination encountered. Approximately 38,464 tons (about 90% of the estimated total) of excavated soil had been trucked off and disposed of off site at either a Class I or a Class II facility. The screening samples were evaluated to see which of these excavations were considered clean and ready for confirmation sampling. If they are not ready for confirmation sampling, then additional excavation will be necessary to remove remaining contamination. Additionally, approximately 3,000 tons of soil characterized as California Hazardous Waste will be transported by rail for disposal out of state starting in mid-September.

Removal Actions

See Section 6, Deliverables Status, for a description of the current status for the Removal Actions and a document deliverable update.

2. MEETINGS AND REPORTS SUBMITTED

Meetings in August 1998

There was a meeting of the BCT/RPM held on August 6, 1998 to discuss the status of the cleanup at HPS. Meetings were held between the Navy and the BCT on August 4, 1998 to discuss the approach to the Parcel E Ecological Risk Assessment Validation Field Study, and on August 18, 1998 to discuss the draft Parcel E FS response to comments issues. Additionally a meeting was held between the Navy and the City of San Francisco Redevelopment Agency (SFRA) to discuss revisions to the HPS Environmental Impact Statement/ Environmental Impact Report (EIS/EIR) being jointly prepared by the Navy and the SFRA on August 25, 1998.

The Restoration Advisory Board (RAB) meeting was held on August 26, 1998. This RAB meeting consisted of a brief status of the remedial action in Parcel B at HPS and additional discussion of the recently distributed draft final Parcel C FS.

Documents Submitted in August 1998

The documents submitted by the Navy during the report period were as follows:

- Final Parcel B Remedial Action Documents
- Technical Memorandum Supporting the Lease of Building 402

3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

Petroleum-Only Sites at Hunters Point Shipyard (HPS)

Significant issues were brought up in the comments on the draft Parcel B Petroleum Corrective Action Plan (CAP). The Navy is continuing to reevaluate its approach on determining petroleum cleanup levels based on its meeting with the RWQCB on May 7, 1998. The Navy will document the revised approach which will be based on evaluating the current geochemical conditions in the petroleum contaminant plumes and the resultant implications for remediation in the upcoming scope for the completion of the Parcel B Corrective Action Plan and preparation of the Parcel C, D and E CAPs.

Cleanup Scenario for Remedial Action at Parcel D

The Navy has proposed a cleanup scenario at Parcel D in the Draft Parcel D ROD consisting of a cleanup to industrial use, with a goal of 10^{-5} risk to industrial workers involving excavation to the groundwater table or to a maximum depth of 10 feet below ground surface to remove contaminants. The community and the regulatory agencies have expressed concern regarding the goal of a 10^{-5} industrial risk and feel that a 10^{-6} industrial risk is more appropriate. Previously, discussions have been held between the Navy and the BCT to discuss this issue in the BCT/RPM meetings as well as in a meeting held on June 11, 1998. An additional discussion planned for the regularly scheduled BCT/RPM meeting was to be held on July 14, 1998; however, that meeting was delayed until August 6, 1998. Additional discussions were felt to be necessary and are scheduled for September 10, 1998. Most of the Draft Final Parcel D ROD issues that have been brought up in the comments from the BCT have been resolved. The remaining issues of concern are the level of cleanup, the depth of cleanup, EPA criteria for TDS and yield, the potential for groundwater cross-contamination at the A/B aquifer interface, and a few other minor issues.

Wetlands Creation Evaluation at Parcels B and E

In previous monthly progress reports, the issue of creation of wetlands by the City of San Francisco in Parcel B and E has been discussed. The process is complete for Parcel B and the Parcel E wetlands feasibility study, which completes the work in evaluating wetlands creation, is expected in November of 1998.

4. REPORTS AND ACTIVITIES FOR SEPTEMBER 1998

Documents Scheduled for Submittal in September 1998

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

- Final Parcel B Confirmation Sampling and Analysis Plan
- Final Basewide Environmental Baseline Survey Revision 01
- Final FOSL for Building 813 and Trailer Site
- Final FOSL for Building 915 and Building E
- Technical Memorandum for Parcels E/F Remediation Integration
- Technical Memorandum on Parcel D Groundwater

Activities Planned for September 1998

Field Work: Complete data gaps field work in Parcel B and continue the remedial action in Parcel B sub-area B-1.

Removal Actions: Completion of the groundwater extraction system at IR-1/21 in Parcel E.

Meetings: Prepare for the meeting between the BCT/RPM meeting scheduled for September 10, 1998. An additional meeting on that same day to discuss the Parcel D ROD issues is planned between the Navy and regulatory agencies. A meeting is scheduled for September 29, 1998 between the Navy and the regulatory agencies to discuss the scope and format of the upcoming Parcel B-1 Finding of Suitability to Transfer (FOST). Also a meeting is scheduled for September 2, 1998 between the Navy and SFRA to continue work on the HPS EIS/EIR. Prepare for the September 23rd RAB meeting.

Ongoing Work: Continue work on various documents/studies/meetings.

5. KEY PERSONNEL CHANGES

None.

6. DELIVERABLES STATUS

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

Parcel A Reports

Final Parcel A Finding of Suitability to Transfer (FOST): The final Parcel A FOST is on hold until the resolution of issues involving the change of Parcel A boundaries to include the surrounding streets. A resolution of this issue between the Navy and the regulatory agencies appears to have been reached

and a letter documenting the EPA's position is still expected that will allow the Draft Final FOST to be finalized.

Parcel B Reports

Parcel B Remedial Design Package: The draft final Revision 1 Remedial Design Documents were submitted on March 23, 1998. Additional minor modifications as requested by the agencies were submitted on April 10, 1998. The submittal date for the final version of this document will be determined following evaluation of agencies' comments received in May and issues discussed in several subsequent meetings. The submittal has been revised to September.

Parcel B Remedial Design Implementation Work Plan: The draft final Remedial Action Documents (implementation work plan) were submitted on June 25, 1998 with a response to agency comments submitted in the first week of August.

Parcel B Infiltration Study: The Parcel B infiltration study, which presents the result of the field investigation of the storm drain line that are below the groundwater table that intersect contaminant plumes, was submitted on April 24, 1998. Comments were received from DTSC on May 18, 1998 and were received from the EPA and RWQCB on June 1 and 2, 1998. Evaluation of those comments continues with the submittal of the draft final version expected in September to the BCT.

Parcel C Reports

Draft Final Parcel C FS Report: The submittal date was July 15, 1998. Comments were received from the EPA, DTSC and RWQCB by the end of the review period on August 31, 1998. The Navy is evaluating the comments to determine if the usual 30 day period for a response to comments will be adequate to address the issues raised.

Parcel D Reports

Draft Final Parcel D ROD: To resolve various issues, the draft final Parcel D ROD was rescheduled by the BCT to August 21, 1998; however, due to outstanding issues the ROD will need to be revised based on ongoing discussions by the BCT. The Navy is currently proposing a submittal date of October 13, 1998.

Parcel E Reports

Final Parcel E RI Report: The draft responses to the agency comments on the draft final Parcel E RI report were submitted on March 10, 1998, with a final submittal expected September 30, 1998.

Parcel E Ecological Risk Assessment Model Validation Study Work Plan: The draft work plan was submitted on July 22, 1998 with the draft final work plan to be submitted on October 14, 1998.

Draft Parcel E FS Report: The draft Parcel E FS report was submitted on January 15, 1998. The submittal date for the draft final Parcel E FS is April 19, 1999.

Parcel F Reports

Draft Parcel F FS Report: The draft Parcel F FS report was submitted on April 3, 1998. Agency comments were due on May 18, 1998; however, due to a request by the regulatory agencies, the review

period was extended to June 18, 1998. Following the receipt of outstanding comments which were expected in August and an evaluation of the comments, the Navy will contact the BCT if a 30-day extension on the normal 45-day period for preparation of response to comments is needed. In addition the Navy is preparing a technical memorandum discussing the issues in regard to the integration of the remedial alternatives for Parcels E and F which may impact the schedule for the draft final Parcel F FS.

Facility-Wide Reports

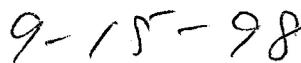
Draft Final Basewide FOSL: The draft final FOSL was submitted on January 7, 1998. Response to Agency/SFRA comments on the Draft Final Basewide FOSL was submitted on March 23, 1998. Final Basewide FOSL will be signed and submitted by the end of 1998.

Removal Actions

Removal Action	Status	Draft Construction Summary Report Submitted	Draft Final Construction Summary Report Submitted
Multi-Parcel, Exploratory Excavations	Fieldwork completed. A final closeout letter for the Construction Summary Report (CSR) is required. Requirements for the letter under evaluation.	September 29, 1997	TBD
IR-9 Pickling and Plate Yard Removal	Fieldwork completed. Comments received May 14, 1998 and June 22, 1998 to the Navy responses to comments. The Navy will respond to EPA comments and then finalize the CSR.	August 2, 1996	Estimated 45 days after submission of Navy response to comments
IR-1/21 Groundwater Removal Action	Awaiting receipt of a sanitary sewer discharge permit to finish start up activities for the groundwater extraction system..	TBD	Estimated 45 days after receipt of Agency comments
IR-3 Waste Oil Reclamation Ponds Removal Action	Fieldwork was completed. The draft CSR report is in preparation.	TBD	Estimated 45 days after receipt of Agency comments
IR-50 Storm Drain Sediment Removal Action	Fieldwork completed. Navy will issue a letter confirming project completion and the response to agencies' comments.	December 19, 1997	September 30, 1998
IR-57 Dry Dock 4 Drainage Culverts Removal Action	Fieldwork completed. Comments were received from EPA on June 2, 1998.	January 8, 1998	October 28, 1998
IR-6 Tank Farm Removal Action	Fieldwork completed. Comments were received on June 4, 1998 from the EPA.	February 23, 1998	Currently under preparation



Richard Powell
Lead Remedial Project Manager



Date