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Engineering Command
To: Distribution
Subj: MONTHLY PROGRESS REPORT FOR DECEMBER 1998, ENGINEERING FIELD
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA
Encl: (1) December 1998 Monthly Progress Report (MPR)

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MONTHLY PROGRESS REPORT

DECEMBER 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

PARCEL B: Additional field work which remains from the initial data gap field effort consists of (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.

The sample to be collected from IR-10 is still awaiting collection as discussed in previous monthly progress reports. The soil, which was obstructing access to the monitoring well, was moved from Building 123 in October. At that time it was discovered that some of the soil had fallen into the well casing requiring the well be purged and redeveloped prior to sampling. The redevelopment and sampling is currently scheduled for January 5, 1998. A revised approach for the infiltration study which reflected comments received from the regulatory agencies with additional proposed sampling was submitted to the BRAC Closure Team (BCT) on December 2, 1998, with comments due by January 4, 1999. The fieldwork would be conducted later in the field season after receiving comments. In addition to the evaluation of those sections with potential infiltration the Navy is planning another attempt at removing sediments from the portions of the storm drains that are continuously submerged that they were unable to handle in the facility wide removal action of storm drain sediments conducted in 1996. The off-site work adjacent to IR-7 and IR-18, which is part of the data gaps work, will be combined with the remedial action monitoring plan well installation. This work is now planned for early 1999, following the completion of the backfilling of the remedial excavations in B-1.

Field work is also planned in a sub-portion of Parcel B to better define the boundaries of the suspected nickel plume in the groundwater in IR-7 adjacent to the shoreline. Since this area might require groundwater monitoring of a minimum 4 quarters duration to confirm the effectiveness of the source removal action being conducted as part of the cleanup it could impede the accelerated transfer of the Parcel B property to the City of San Francisco. To avoid this possible constraint, the area of the contaminated groundwater might be deleted from the property to be transferred under the B-1 Finding of Suitability to Transfer (FOST) document. The field work scheduled to begin on January 4, 1998 will consist of groundwater sampling with a Hydropunch sampler equipped cone penetrometer testing rig to evaluate the boundaries of the plume, if it is present.

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

Remedial Investigation (RI) Documents

PARCEL E: The draft final work plan for the validation study was submitted on October 14, 1998 but did not include the Quality Assurance Project Plan. To address this need, the draft Parcel E Validation Study Quality Assurance Project Plan Addendum was issued October 26, 1998 with comments due on November 25, 1998. Comments were received from the EPA on November 24, 1998. The Navy's response to comments will be issued January 14, 1999 with the draft Final Parcel E Validation Study Quality Assurance Project Plan Addendum.

The response to comments on the draft Final Parcel E RI was submitted on October 7, 1998. Comments on the Navy's responses were received November 13, 1998 from the California Department of Health Services discussing the radiation investigation. Responses to this latest set of comments are undergoing internal review by the Navy and should be submitted in February. The Parcel E RI will be considered complete once the results of the validation study have been published.

Feasibility Study (FS) Reports

PARCEL C: The issues last discussed in regards to the draft FS such as, the level and depth of cleanup; classification of groundwater as a drinking water source; and the impact of the hydrogeologic interconnections between the A and B aquifers which are also being discussed in regards to the Parcel D Record of Decision (ROD) are still germane to the schedule for the submittal of the draft final Parcel C FS. Based on the interrelated aspects of the issues, the Navy has proposed to submit a revised schedule for the FS following the resolution of the issues which are currently still being discussed in the Parcel D ROD. The agencies concerns regarding the lack of a schedule were discussed at the issues resolution meeting that was held on December 15 and 16, 1998. At that meeting the Navy agreed to provide a schedule or date for the submittal of a revised schedule by January 12, 1999.

PARCEL E: The submittal date for the draft final Parcel E FS is April 19, 1999. The Parcel E FS submission schedule is under discussion for revision due to delays in laboratory testing and delays in the validation of data. The response to comments on the draft Parcel E FS will be issued with the draft final Parcel E FS. The draft Parcel E Data Gaps Work Plan and Sampling Analysis Plan was submitted on October 30, 1998 with comments due on December 16, 1998. Comments were received from the EPA on December 10, 1998 and from the RWQCB on December 18, 1998. DTSC requested an extension of the comment period to January 15, 1999, which the Navy has agreed to under the Federal Facilities Agreement.

PARCEL F: 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. 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 issues related to the interconnection of the remedial alternatives under consideration for the Parcel E FS, that date was revised to May 10, 1999. The Navy's draft response to comments on the draft FS will be issued January 11, 1999.

Proposed Plan (PP)

The dates for the submission of the draft PPs for Parcel C and Parcel F will have to be revised due to various raised issues, which have delayed the completion of those FS documents. The submission date for the Parcel E Draft PP is currently July 5, 1999 however it will require revision as well.

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 previous meetings 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 is still evaluating the date for the submittal of the Final Parcel D ROD. The revised schedule and issues were discussed most recently at the issues resolution meeting held on December 15 and 16, 1998. At that meeting the Navy agreed to propose an approach for the groundwater issues at IR-9 and IR-33 by January 12, 1998. It was also agreed that the Navy would propose their approach for the remedy by January 15, 1998 and propose a date for completion of the Parcel D ROD.

Remedial Design Documents

PARCEL B: The Remedial Design (RD) and remedial action documents have overlapping submittal and review cycles due to the accelerated schedule for the cleanup.

As was discussed in previous monthly progress reports RD documents to be included in future submittals will consist of the Remedial Action Monitoring Plan, RD drawings and replacement pages for technical specifications, Confirmation Sampling and Analysis Plan, and Work Plan. The revised approach to the infiltration study for the storm drains in Parcel B was submitted on December 2, 1998. The submittal of these documents would complete the work on the remedial design documents for Parcel B.

The draft final Parcel B RA documents were submitted on June 25, 1998. Revised sections and appendices to the RA documents were submitted on November 24, 1998 to update the originally submitted documents with subsequent changes such as the addition of areas of petroleum cleanup. Currently only the addenda for storm drain work remains to be submitted for review.

PARCEL D: Preparation of the Parcel D preliminary RD documents has been delayed due to unresolved issues for the Parcel D ROD.

Remedial Action Implementation

The Parcel B remedial action which consists of soil excavation and backfilling continues. The work in Parcel B-1 consists of 35 excavations comprising both remediation areas and de minimus areas of which 29 (83%) required excavation step outs. Of the 29 excavations requiring step outs 17 are completed and 18 are still in progress. To ensure that these open excavations do not fill up with rain water, the contractor is back-filling them with clean fill and planning to return later to dig out the area of a particular side that remained contaminated next to the clean fill. As of mid-December approximately 69,000 tons of contaminated soil had been disposed of off site from the work in B-1.

The work in B-2 consists of excavating 63 areas, most of which are de minimus areas. Of these areas, 37 have been excavated to the original boundaries and the remaining 26 are in progress. Since the data from the samples has not been received yet the number that will require step-outs is unknown. Also ongoing in Parcel B-2 is the removal of the fuel lines and steam lines. As of mid-December approximately 3,400

tons of soil had been disposed of off site from the work in B-2 with another 4,100 tons stockpiled for off site disposal as well.

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 December 1998

The monthly BCT/RPM meeting to discuss the status of the cleanup at HPS was not held in December since a separate meeting to discuss issues and their resolution was already scheduled for that month. The issues resolution meeting was held on December 15 and 16, 1998 and covered the general status of the work along with specific issues that were discussed by the BCT and their upper level management. Action items that came out of those meetings will be reflected in several of the sections of this and future monthly progress reports.

No Restoration Advisory Board (RAB) meeting was held in December due to the holidays.

Documents Submitted in December 1998

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

- Revised Parcel B Remedial Action Documents
- Revised Parcel B Infiltration Study Work Plan
- Revised Technical Memorandum on the Calculation of Background Nickel Levels

3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

Target Cleanup Level for Nickel in the Parcel B Remedial Action

As was discussed in the previous monthly progress report, levels of nickel were encountered during the Parcel B remedial action which were above the target cleanup level documented in the Parcel B ROD. It appears that the nickel encountered may be due to the occurrence of nickel-rich bedrock at the site rather than due to contamination. To evaluate the possibility the Navy investigated the nature of the nickel occurrence in conjunction with evaluating additional parameters that may be used as indicators. Following the receipt of comments from the regulatory agencies on a draft technical memorandum describing the Navy's revised approach to determining ambient nickel levels a revised technical memorandum and written responses to comments was submitted on December 7, 1998. If no further comments are received on the new approach it will be used in Parcel B and facility wide when nickel is encountered as a chemical of concern.

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. This approach will require additional sampling which will be proposed in a work plan to be submitted to the RWQCB on January 4, 1999.

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. Discussions continue with the most recent occurring on December 15 and 16, 1998 at the issues resolution meeting. Many of the Draft Final Parcel D ROD issues that have been brought up in the comments from the BCT have been resolved. However, there are several significant issues that need resolution in addition to the issue concerning the level of cleanup. The issues raised could have a significant impact on the cleanup in the other parcels with a proposed industrial reuse, Parcels C and E and delays in the resolution of the Parcel D may affect the schedules for those parcels.

4. REPORTS AND ACTIVITIES FOR JANUARY 1999

Documents Scheduled for Submittal in January 1999

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

- Final FOSL for Building 813 and Trailer Site
- Final FOSL for Building 915 and Building E
- Final Parcel B Remedial Design documents and/or revision pages
- Draft Work Plan for Additional Data for Petroleum CAPs
- Draft Final Quality Assurance Project Plan Addendum for the Ecological Risk Assessment Field Validation Study
- Navy's Response to Agency Comments on the Exploratory Excavations Draft Project Completion Report Responses
- Parcel B Data Gaps Technical Memorandum
- Draft Response to Agency Comments on the Draft Parcel F FS

Activities for January 1999

Field Work: Continue data gaps field work in Parcel B and continue the remedial action in Parcel B sub-areas B-1 and B-2 and begin the delineation of the boundaries of B-3, if necessary.

Removal Actions: Begin operation of the groundwater extraction system at IR-1/21 in Parcel E following approval of the discharge permit by the City of San Francisco.

Meetings: Prepare for the BCT/RPM meeting scheduled for January 12, 1999. Prepare for the RAB meeting to be held on January 27, 1999.

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

5. KEY PERSONNEL CHANGES

DTSC's RPM for HPS is still to be determined. Until the replacement is designated, Mr. Chein Kao will act as the DTSC representative on the BCT.

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 revised response to agency comments on the Parcel A draft FOST was submitted November 6, 1998. The draft Final FOST is scheduled to be submitted in February 1999.

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 final documents will be submitted in January 1999.

Parcel B Remedial Action Documents: 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. Additional minor corrections were submitted on November 24, 1998 with additional pages submitted on December 1, 1998.

Parcel B Infiltration Study: The Parcel B infiltration study, which presents the proposed field investigation of the storm drain lines that are below the groundwater table and 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. The draft final version was submitted on December 2, 1998 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 expected to revise the schedule following resolution of the pertinent issues in the Parcel D ROD discussions.

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 had proposed a previous submittal date that has passed. A new date will need to be submitted based on current discussions of the still unresolved issues.

Parcel E Reports

Final Parcel E RI Report: The Navy's responses to the agency comments on the draft final Parcel E RI report were submitted on October 7, 1998 and additional comments from DHS were received on November 13, 1998. The Navy will submit a response to those comments in February 1999 following internal review.

Draft Final Parcel E Ecological Risk Assessment Model Validation Study Work Plan: The draft Final Work Plan was submitted on October 14, 1998. The draft Quality Assurance Project Plan Addendum was submitted on October 26, 1998 with comments received from EPA on November 24, 1998. The draft Final Quality Assurance Project Plan addendum is to be submitted on January 14, 1999.

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. The schedule for submission of this document is under review.

Parcel F Reports

Draft Parcel F FS Report: The draft Parcel F FS report was submitted on April 3, 1998. The schedule for submission of the draft final Parcel F FS has been revised to May 10, 1999 to incorporate the suggestions that came out the evaluation of the integration of the Parcel E and F remedial alternatives, and to allow resolution of all outstanding issues. The Navy's response to comments on the draft Parcel F FS is scheduled to be submitted on January 11, 1999.

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 May 1999.

Removal Actions

Removal Action	Status	Draft Construction Summary Report Submitted	Draft Final Construction Summary Report (CSR) Submitted
Multi-Parcel, Exploratory Excavations	Fieldwork completed.	September 29, 1997	February 1999
IR-9 Pickling and Plate Yard Removal	Fieldwork completed. The draft final CSR report is undergoing review by the Navy. EPA submitted comments on May 14, 1998 and suggested additional discussion of the issues. 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	Received a sanitary sewer discharge permit. Start up activities for the groundwater extraction system should begin in mid January.	March 31, 1999	Estimated 45 days after receipt of Agency comments
IR-3 Waste Oil Reclamation Ponds Removal Action (formerly reported as Floating Product Removal)	Fieldwork was completed.	February 26, 1999	Estimated 45 days after receipt of Agency comments
IR-57 Dry Dock 4 Drainage Culverts Removal Action	Fieldwork completed. Comments were received from EPA on June 2, 1998.	January 8, 1998	November 16, 1998
IR-6 Tank Farm Removal Action	Fieldwork completed. Comments were received on June 4, 1998 from the EPA.	February 23, 1998	February 1999



Richard Powell
Lead Remedial Project Manager

1-15-99

Date