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Engineering Command
To: Distribution
Subj: MONTHLY PROGRESS REPORT FOR JANUARY 1999, ENGINEERING FIELD
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA
Encl: (1) January 199 Monthly Progress Report (MPR)
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MONTHLY PROGRESS REPORT

JANUARY 1999

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: A groundwater sample from the monitoring well in Installation Restoration Site (IR)-10 which had encountered volatile organic compounds (VOCs) in the remedial investigation has been collected. The data is being validated. Additional field work which remains from the initial data gap field effort consists of:

- (1) an additional phase of the infiltration study, and
- (2) additional sampling on the off-site property adjacent to IR- 07 and 18 to determine the extent of contamination and possible migration.

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 December 31, 1998. Comments were received from U.S. Environmental Protection Agency (EPA) and the Regional Water Quality Control Board (RWQCB) on January 7, 1998. The fieldwork is scheduled for March of 1999 with the results being incorporated in the construction summary for Parcel B-2. 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 began in a sub-portion of Parcel B (preliminarily designated as B-3 using the area designations arising from the accelerated remedial action in this parcel) to better define the boundaries of the suspected nickel plume in the groundwater in IR-7 adjacent to the shoreline. This area may 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. If 4 quarters monitoring is required, 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 will be deleted from the property to be transferred under the B-1 Finding of Suitability to Transfer (FOST) document. The field work consists of groundwater sampling with a Hydropunch sampler equipped cone penetrometer testing rig to evaluate the boundaries of the plume. The results will be presented in a short technical memorandum expected in March.

Enclosure (1)

Remedial Investigation (RI) Documents

PARCEL E: As was noted in previous progress reports, the issues concerning the need for field validation of the ecological risk assessment brought up in the RI report are to be addressed through field sampling. A report of the results will be incorporated in the draft final Parcel E Feasibility Study as an appendix. 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 was 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: Unresolved issues in regards to the draft FS are 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. These issues are also being discussed in regards to the Parcel D Record of Decision (ROD) and 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, which 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. However, due to ongoing discussions both internally and with the regulatory agencies, that date will need to be revised.

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 in the validation of data. To be included as an appendix in the FS is the evaluation of the feasibility of wetlands creation in Parcel E, which was submitted on November 3, 1998. 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. A verbal request was received on January 19 from DTSC for an extension until February 1, 1999.

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 was issued January 11, 1999 with comments due in 45 days.

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 Draft Final Parcel D ROD. The revised schedule and issues were discussed most recently at meetings held on January 12, and 26, 1999. The Navy is still evaluating their approach to the cleanup. However, in the interim they are meeting with the BCT and conducting an evaluation of the proposed excavation areas. The evaluation is using a risk management approach to determine if this is a more appropriate way to handle the cleanup rather than the original parcel wide scheme. Additional meetings to address the use of a more detailed risk management approach are scheduled for February 9 and 18, 1999.

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. Revised sections and appendices to the RD documents will be submitted in February 1999 to update the originally submitted documents with subsequent changes such as the addition of areas of petroleum cleanup. 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 the 35 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 the end of January approximately 74,000 tons of contaminated soil had been disposed of

off site from the work in B-1. Approximately 54,000 tons of backfill has been imported with 36,400 cubic yards placed in the excavations

The work in B-2 consists of excavating 63 areas, most of which are de minimus areas. Of these areas, 45 have been excavated to the original boundaries and the remaining 18 are in progress. Also ongoing in Parcel B-2 is the removal of approximately 2,300 linear feet of fuel lines and 5,500 linear feet of steam lines. As of the end of January approximately 7,700 tons of soil had been disposed of off site from the work in B-2.

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 January 1999

The monthly BCT/RPM meeting to discuss the status of the cleanup at HPS was held on January 12, 1999. A separate meeting was held on January 26, 1999 covering the Parcel D remedial excavations and how to apply risk management principles to the cleanup.

A Restoration Advisory Board (RAB) meeting was held on January 27, 1999 in which the status of the discussions between the BCT concerning the Parcel D ROD was presented along with a short description of the upcoming technology demonstration by Precision Sampling scheduled for implementation in March or April.

Documents Submitted in January 1999

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

- Draft Work Plan for Additional Data for Petroleum CAPs
- Draft Final Quality Assurance Project Plan Addendum for the Ecological Risk Assessment Field Validation Study
- Draft Response to Agency Comments on the Draft Parcel F FS

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. No further

comments have been received but additional discussions concerning minor points are expected in February and may be reflected in a revised approach. The approach 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 was proposed in a work plan submitted to the RWQCB on January 4, 1999. A meeting was held on January 19, 1999 with the RWQCB to discuss the comments on the workplan and obtain verbal approval of the approach. In that meeting the RWQCB approved the approach in concept and agreed to provide written comments by January 31, 1999. Responses to the comments will be provided by March 10, 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 January 12, and 26, 1999. 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 FEBRUARY 1999

Documents Scheduled for Submittal in February 1999

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

- Navy's Response to Comments on the Department of Health Service's Comments on the Navy's Response to Comments on the Draft Final Parcel E Remedial Investigation
- Final Parcel B Remedial Design documents and/or revision pages
- Parcel B Data Gaps Technical Memorandum
- Parcel B Remedial Action Work Plan Revision 6
- Draft Final FOST for Parcel A

Activities for February 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 finalize the delineation of the boundaries of B-3, if needed.

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 meetings scheduled for February 9 and 18, 1999. Prepare for the RAB meeting to be held on February 24, 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 February 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. Additional pages are expected on February 1, 1999.

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. Comments have been received from EPA and RWQCB. The Navy will respond to comments in early March.

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 was 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 was 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	April 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 February.	January 29, 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-6 Tank Farm Removal Action	Fieldwork completed. Comments were received on June 4, 1998 from the EPA.	February 23, 1998	April 1999

Richard Powell

Richard Powell
Lead Remedial Project Manager

2/22/99

Date