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

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MONTHLY PROGRESS REPORT

FEBRUARY 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. Trichloroethene was detected in the sample at approximately the same levels as in the original sampling and the potential degradation product, vinyl chloride was not detected. 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.

The fieldwork for the revised infiltration study is now scheduled for late March or early April 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 late March 1999, following the completion of the backfilling of the remedial excavations in B-1 and B-2.

Field work has been completed 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 if necessary from the property to be transferred under the B-1 Finding of Suitability to Transfer (FOST) document. The results of the field work which consisted of groundwater sampling with a Hydropunch sampler equipped cone penetrometer testing rig to evaluate the boundaries of the plume are being evaluated. The evaluation will be presented in a short technical memorandum expected in March.

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 and its' Quality Assurance Project Plan Addendum have been submitted and finalized. The report of the results is expected in to be submitted in June 1999.

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 on March 1, 1999. The Parcel E RI will be considered complete once the results of the validation study have been published.

Feasibility Study (FS) Reports

PARCEL C: Issues 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 continue to be discussed. 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. However, due to ongoing discussions both internally and with the regulatory agencies, the submittal date for the FS will need to be revised.

PARCEL E: The submittal date for the draft final Parcel E FS was 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 final Parcel E Data Gaps Work Plan and Sampling Analysis Plan, which will include the response to agency comments, is due to be submitted on April 26, 1999.

PARCEL F: The draft Parcel F FS was submitted on April 3, 1998. The Navy's draft response to agency comments on the draft FS was issued on January 11, 1999 with comments due in 45 days. The Navy is considering incorporating this work as part of a San Francisco Bay wide sediments working group internal to the Navy. If after further discussions with the regulatory agencies this approach is chosen, the schedule for the submittal of the draft final FS will need to be revised.

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 February 9, and 18, 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 March 4, 9, 11, 23 and 25, 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 draft final revised approach to the infiltration study for the storm drains in Parcel B was submitted on February 26, 1999. Revised sections and appendices to the RD documents will be submitted in March 1999 to update the originally submitted documents with subsequent changes such as the addition of areas of petroleum cleanup and additional chemicals of concern that were encountered during the 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 and additional chemicals of concern that were encountered during the 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 all are complete and are being backfilled. 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 February 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 still 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 February 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 February 1999

The monthly BCT/RPM meeting to discuss the status of the cleanup at HPS was held on February 9, 1999. Separate meetings were held on February 18 and 25, 1999 continuing the Parcel D risk management process in the cleanup and on February 17, 1999 to discuss with the City of San Francisco the Parcel B remedial action and closure report.

A Restoration Advisory Board (RAB) meeting was held on February 24, 1999 in which the candidate firms for the master developer contract with the City of San Francisco for the redevelopment of Hunters Point Shipyard presented their approach to the redevelopment, cleanup, and the community employment.

Documents Submitted in February 1999

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

- Draft Final FOST for Parcel A
- Parcel B Data Gaps Technical Memorandum
- Draft Final Revised Storm Drain Infiltration Study Approach
- Parcel B Remedial Action Work Plan Revision 5
- Parcel B Remedial Action Site Health and Safety Plan Revision 4

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. 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 11, 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 February 18 and 25, 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 MARCH 1999

Documents Scheduled for Submittal in March 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 Remedial Action Work Plan Revision 6
- Draft Parcel B Groundwater Nickel Plume Delineation
- Draft Final Work Plan for Additional Data for Petroleum CAPs

Activities for March 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: Continue operation of the groundwater extraction system at IR-1/21 in Parcel E. This is an ongoing operation until a final remedy has been selected and implemented. As such, this item will not be listed in later monthly progress reports.

Meetings: Prepare for the BCT/RPM meetings scheduled for March 9, 11, 23 and 25, 1999. Prepare for the RAB meeting to be held on March 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 was submitted on February 15, 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 March 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 were submitted 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 submitted the draft final version with a response to comments on February 6, 1999.

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 March 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 was 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. The groundwater extraction system began operation February 20, 1999.	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 17, 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
Lead Remedial Project Manager

3-18-99
Date