

5/12/93

HUNTERS POINT ANNEX
INTERIM FFA AMENDMENT CONDITIONS AND ASSUMPTIONS

1. (P) connotes primary documents; (S) connotes secondary documents.

2. For primary documents deadlines are enforceable dates; for other documents targets have been mutually agreed upon by the parties but are not subject to Section 8 (Deadlines), Section 9 (Extensions), or Section 13 (Enforceability). Schedule negotiation deadlines are covered under Sections 8.2 and 8.3 of the FFA and are enforceable.

3. SI technical meetings and meeting summaries for all parcels constitute the workplan for the next phase of RI sampling activities. The technical meetings are intended to be decision making meetings; the meeting summaries will formalize agreements reached.

4. The parcel SI reports will focus on sites the Navy is not proposing to sample further to provide the agencies opportunity to carefully review these decisions.

5. SI documents are disputable the at the time the corresponding draft final primary document is issued (e.g., the parcel RIs).

6. Parcel A SI documents will be primary documents since a Parcel RI/FS is not proposed prior to leasing of Parcel A.

7. ESAP, TIMP, air sampling, ecological risk assessment phases 1A and 1B, radiological investigations and contract authorization for the RI/FS's must be scheduled and implemented so as not to impede expeditious implementation of the parcel RI/FSs. Adherence to target dates in the Interim Amendment schedule for these activities will meet this objective.

8. Unless otherwise noted, draft documents have a 45 day review period and final documents a 30 day review period.

9. Assumptions regarding deadlines and target dates for ASRs and removals are as follows (ASRs are now considered secondary documents):

a. Draft and Draft Final ASRs/EECAs have 30 day review and revision periods.

b. The ASR/EECA/Public comment periods begin 7 days after the final ASR/EECA and public notice.

c. The public comment period for removals is 30 days.

d. Draft Action Memoranda are due 30 days after the close of public comment.

e. Draft and Final Action Memoranda have a 21 day review and revision period.

f. Final Navy Approved Action Memoranda are due 30 days after submittal of Final Action Memoranda.

10. OU 1 Treatability Study proposals will include schedules for implementation of the work. Any subsequent removal action schedules will be negotiated based on results of the treatability studies. The OU 1 ASR will be replaced by the treatability studies and any subsequent removal actions.

11. If Final ASR/EECAs conclude that No Action is needed; the documentation process for that OU shall be terminated at that point. (Regardless of removal action status, all OU sites will be incorporated into the Parcel RI/FSSs.)

12. Removal actions are disputable as outlined in FFA Sections 11.5 and 11.6 (Emergencies and Removals) and Section 12 (Dispute Resolution).

13. Proposed changes to target dates will be presented by the Navy to the agencies in advance for concurrence. The Navy will update the schedule to reflect agreed upon changes.

14. Operable Units 1-5 as defined in the existing FFA are being replaced by a parcel based approach. Parcels A-E will become the governing Operable Units. The current OUs 1-5 are being retained to evaluate the need for removal actions at any of the sites within these OUs. The designation of these sites as Operable Units will cease at the conclusion of the removal action documentation.

15. The Navy will not produce Summary of Findings Memoranda (SFM).

16. Operable Unit 5 will no longer "consist of any remaining areas of contamination...other than those included in OUs 1-4." Operable Unit 5 sites 11-17 are now included in the Group 5 sites, to be addressed as removal actions if needed. All currently unidentified IR sites will be incorporated into their respective geographic parcel boundaries.

17. The existing FFA designates Operable Unit 5 as addressing the verall site. As of this amendment, the function of the overall site RI/FS will fall to the last parcel scheduled for completion, to be determined during parcel schedule negotiations.

18. This Interim Amendment will be revised to include the RI/FS, Proposed Plan and Record of Decision schedules for the parcels, as soon as those dates are agreed upon by the FFA parties, in accordance with the negotiation deadlines in this amendment.

APPENDIX A: INTERIM AMENDMENT FFA SCHEDULES FOR 1) SITE INSPECTIONS (SI), 2) RI/FS NEGOTIATIONS, 3) OTHER INVESTIGATIONS, AND 4) OU'S 1-4 AND GROUP FIVE SITES

SITE INSPECTION WORK PLANS	DEADLINES	TARGET DATES
Draft SI Workplan Vol. I and II (S)		12/20/91
Draft Final SI Workplan Vol. I and II (S)		3/31/92
Draft SI Workplan Vol. III (S)		4/21/92
Draft Final Workplan Vol. III (S)		7/22/92
PARCEL A		
Draft SI Workplan Addendum (S)		11/30/92
Revised SI Workplan Addendum/Response to Comments (S)		1/29/93
Parcel A Fact Sheet/Public Comment		12/11/92
Draft SI Report (P)	7/1/93	
Draft Final SI Report (P)	8/31/93	
Final SI Report (P)	Per Consultation Section in FFA	9/31/93
PARCEL B		
SI Vol. I Technical Meeting with Agencies		10/12/93
SI Vol. I Meeting Summary (S)		10/26/93
SI Vol. II and III Technical Meeting with Agencies		7/27/93
SI Vol. II and III Meeting Summary (S)		8/10/93
Draft Parcel B SI Report (S)		1/11/94

PARCEL C (SI Workplans cont.)	DEADLINES	TARGET DATES
SI Vol. I Technical Meeting with Agencies		10/26/93
SI Vol. I Meeting Summary (S)		11/9/93
SI Vol. II and III Technical Meeting with Agencies		8/31/93
SI Vol. II and III Meeting Summary (S)		9/14/93
Draft Parcel C SI Report (S)		1/25/94
PARCEL D		
SI Vol. I Technical Meeting with Agencies		11/23/93
SI Vol. I Meeting Summary (S)		12/7/93
SI Vol. II and III Technical Meeting with Agencies		10/26/93
SI Vol. II and III Meeting Summary (S)		11/9/93
Draft Parcel D SI Report (S)		2/22/94
PARCEL E		
SI Vol. I Technical Meeting with Agencies		12/21/93
SI Vol. I Meeting Summary (S)		1/4/94
SI Vol. II and III Technical Meeting with Agencies		10/19/93
SI Vol. II and III Meeting Summary (S)		11/2/93
Draft Parcel E SI Report (S)		3/22/94

PARCEL RI/FS SCHEDULE NEGOTIATIONS	DEADLINES	TARGET DATES
Parcel B Schedule Submittal	Per FFA Sections 8.2 and 8.3	10/12/93
Parcel C Schedule Submittal	Per FFA Sections 8.2 and 8.3	10/26/93
Parcels B and C Schedule Negotiations with Agencies	Per FFA Sections 8.2 and 8.3	10/26/93 to 11/26/93
Parcel D Schedule Submittal	Per FFA Sections 8.2 and 8.3	11/23/93
Parcel D Schedule Negotiations with Agencies	Per FFA Sections 8.2 and 8.3	11/23/93 to 12/23/93
Parcel E Schedule Submittal	Per FFA Sections 8.2 and 8.3	12/21/93
Parcel E Schedule Negotiations with Agencies	Per FFA Sections 8.2 and 8.3	12/21/93 to 1/21/94
OTHER INVESTIGATIONS SCHEDULES		
Draft Final Ecological Sampling and Analysis Plan (ESAP)		7/31/91
Draft Ecological Risk Assessment Work Plan		5/7/92
Ecological Risk Assessment Phase IA Technical Meeting with Agencies		11/19/93
Ecological Risk Assessment Phase IB Technical Meeting with Agencies		9/9/94
Draft Ecological Risk Assessment Technical Memo (S)		9/30/94

OTHER INVESTIGATIONS SCHEDULES (cont.)	DEADLINES	TARGET DATES
Tidal Influence Monitoring Plan Completed		3/8/93
Air Sampling/Lab Analysis Completed		9/10/93
Site Wide Radiological Assessment Completed		NEED DATE FROM NAVY
Parcel RI/FS Activities Contract Authorization Completed		10/19/93
OPERABLE UNIT SCHEDULES		
<u>OPERABLE UNIT 1</u>		
IR-3 Treatability Study Work Plan and Schedule (S)		6/29/93
Navy Response to EPA Proposal for Radium Removal Treatability Study (S)		5/10/93
Containment Wall Options Proposal for Shoreline (S)		6/7/93
<u>OPERABLE UNIT 2</u>		
Draft Feasibility Study (P)	10/12/92	
Draft Summary Alternative Selection Report (ASR) (P)	2/8/93	
Draft Final Summary ASR/Engineering Evaluation and Cost Analysis (EECA) (S)		5/14/93
Final Summary ASR/EECA (S)		7/9/93
Start of Public Comment Period for ASR/EECA		7/16/93
Draft Action Memorandum		9/10/93

<u>OPERABLE UNIT 2 (cont.)</u>	<u>DEADLINES</u>	<u>TARGET DATES</u>
Final Action Memorandum (from USN with no signature)		10/22/93
Final Action Memorandum Approval		11/19/93
<u>OPERABLE UNIT 3</u>		
Draft ASR (P)	3/12/93	
Draft Final ASR/EECA (S)		5/12/93
Final ASR/EECA (S)		7/7/93
Start of Public Comment Period		7/14/93
Draft Action Memorandum		9/8/93
Final Action Memorandum		10/20/93
Final Action Memorandum Approval		11/17/93
<u>OPERABLE UNIT IV</u>		
Draft ASR (P)	1/20/93	
Draft Final ASR/EECA (S)		4/26/93
Final ASR/EECA (S)		6/21/93
Start of Public Comment Period		6/28/93
Draft Action Memorandum		8/23/93
Final Action Memorandum		10/4/93
Final Action Memorandum Approval		11/1/93
<u>GROUP V SITES</u>		
Draft ASR/EECA (S)		8/26/93
Draft Final ASR/EECA (S)		10/21/93
Final ASR/EECA (S)		12/16/93
Start of Public Comment Period		12/23/93
Draft Action Memorandum		2/18/94
Final Action Memorandum		4/1/94
Final Action Memorandum Approval		4/29/94