

5090
Ser 1842/6166
29 Mar 1996

Ms. Shin-Roei Lee
California Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, CA 94612

Subj: Cleanup and Abatement Order (No. 95-228) and Site Cleanup Requirements (No. 95-235),
Point Molate Naval Fuel Depot, Richmond, California

Dear Ms. Lee:

I would like to keep you apprised of the current status of BRAC IV Funding. The Commander Naval Facilities Engineering Command (NAVFAC) by 23 February 1996 letter requested that the Chief of Naval Operations reprogram funding for the Fiscal Year 1996 (FY96) BRAC IV Environmental Compliance and Restoration Program. It appears that this request has been favorably received. Within our available funding, we have been working diligently to meet the scheduled dates required by the Regional Water Quality Control Board's (RWQCB) two orders, but some of the dates have passed and others may need to be rescheduled. The following paragraphs address our suggested modifications to the schedule.

Cleanup and Abatement Order (No. 95-228)

Provision No. 3: Technical Report including tissue residue study due on 30 April 1996. The RWQCB Project Manager and Engineering Field Activity West (EFA WEST) Environmental Protection Specialist agreed on the Statement Of Work/Sampling Plan for the Technical Report on 18 March 1996. Funding was requested from the Fleet Industrial Supply Center Oakland (FISCO) on 19 March 1996. The EFA WEST will be awarding this work to the Department of the Interior, National Biological Service (NBS). The tissue residue testing requires a minimum of 20 days. NBS estimates that the entire procedure will take approximately thirty-three (33) days to complete, after funding has been received. EFA WEST request that this date be rescheduled to 31 May 1996.

Provision No. 4: Technical Report documenting the completion of the mitigation of the wetlands north of the treatment pond area and the removal of the concrete bags and grading to sea level due on 31 October 1996. As previously discussed with you, EFA WEST is very concerned about the stability of the existing timber wall that is protected by the concrete bags. We need to conduct a detailed engineering evaluation of the stability of the existing timber wall, and prepare plans and specifications for the removal of the concrete bags, grading to sea level, and complete any repairs required to strengthen the timber wall. To facilitate this, EFA WEST requests that this Provision be separated into two items, the mitigation and the removal plan.

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The mitigation of the wetlands can still meet the 31 October 1996 due date, but the removal work will require additional time. EFA WEST will need to obtain funding, negotiate a contract to conduct the evaluation and prepare plans and specifications for this work. A revised schedule will be provided to the RWQCB as soon as this contract is awarded.

Site Cleanup Requirements (No. 95-235)

TASK 2: The Semiannual Groundwater Monitoring Report: EFA WEST provided the RWQCB with groundwater monitoring data for the wells with free product by FAX on 25 March 1996, but this data does not include all the monitoring wells required by this task. The additional monitoring well sampling required will have to be funded from the FY96 BRAC IV Budget. As previously discussed FY96 BRAC IV funding was deleted from the Federal Budget and NAVFAC is working to obtain the required funding. A revised schedule for implementation of the Semiannual Groundwater Monitoring required by this task will be provided to the RWQCB as soon as funding is received and a contract can be awarded.

TASK 3: The Completion Report for the Extraction Trench due 1 February 1996. The Completion Report is the last item of work before closing out a construction contract. The International Technology (IT) Construction Contract was not closed-out, because additional work was required to complete this project. FY96 BRAC IV funding is required to complete the additional work. EFA WEST has decided to close out this contract and add this work to the future Extraction Trench Extension Contract. IT will be providing the Navy a Draft Completion Report on 12 April 1996. EFA WEST requests that this date be rescheduled to 19 April 1996.

TASK 4: The Operation Maintenance and Performance Evaluation of the Extraction Trench due on 1 March 1996. This Task will be covered by two (2) different reports, the Operation & Maintenance (O&M) Manual and the Trench Performance Evaluation Report. The O&M Manual was received by EFA WEST on 21 March 1996. The O&M Manual will be forwarded to the RWQCB by 29 March 1996. Trench Performance Evaluation Report is currently being prepared by PRC and is currently scheduled into EFA WEST on 31 May 1996. EFA WEST requests that this date be rescheduled to 7 June 1996.

TASK 5: Evaluation of the current Wastewater Treatment Facility with additional pollutants and hydraulic loading from the extraction trench groundwater due 1 April 1996. The Navy Public Works Center (PWC) San Francisco Bay Area has been sampling and testing the outflow from the Treatment Ponds as required by the RWQCB discharge permit. PWC has responded to recent tests outside permit limits by increasing aeration of the ponds. This test data was provided to the RWQCB by FAX on 25 March 1996. EFA WEST needs to award a contract to evaluate this data and prepare the final report. FY96 BRAC IV funding is required to complete this work. The revised schedule will be provided to the RWQCB as soon as funding is received and the contract is awarded.

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TASK 7a: Draft Interim Corrective Action Work Plan for free product removal due 1 February 1996. The BRAC Environmental Coordinator (BEC) has been working with Point Molate in-house personnel to come up with a Draft Interim Corrective Action Plan for free product removal. Point Molate in-house personnel have conducted the first free product removal on 4 March 1996. EFA WEST request that this date be rescheduled to 5 April 1996.

TASK 7b: Final Interim Corrective Action Work Plan for free product removal due 1 April 1996. The BEC will submit the Final Interim Corrective Action Work Plan for free product removal thirty (30) days after receiving the RWQCB comments. EFA WEST request that this date be rescheduled to 3 June 1996.

TASK 10a: Draft Design of the Best Available Treatment Technology for the Groundwater due on 1 January 1996. This Task was completed on 22 November 1995 when 100 Percent Plans and Specification for the New Treatment Plant were submitted to the RWQCB.

TASK 10b: Final Design of the Best Available Treatment Technology for the Groundwater due on 1 March 1996. The Final Plans and Specification for the New Treatment Plant were mailed to the RWQCB on 21 March 1996.

TASK 10c: Completion Report for the Construction and Startup of the Best Available Treatment Technology for the Groundwater due on 30 June 1996. The original date required in the Order is in error. The Completion Report can not be completed until the Treatment Plant is in operation. The Treatment Plant Contract, which was completed on 19 March 1996, will require approximately 2 Months to Award to the Contractor. The Treatment Plant takes about 6 months from the time it is ordered until it is delivered. The plant then needs to be installed and tested. FY96 BRAC IV Funding is required to award and install the Treatment Plant Contract. A revised schedule will be provide to the RWQCB as soon as funding is received and the contract is awarded.

TASK 11a: Draft Design of the Groundwater Extraction Trench Extension due on 30 March 1996. The design of the Extraction Trench Extension has been negotiated and is waiting on FY96 BRAC IV Funding. A revised schedule for this design will be provided to the RWQCB as soon as funding is received and the contract is awarded

TASK 11b: Final Design of the Groundwater Extraction Trench Extension due on 30 May 1996. The final design of the Extraction Trench Extension will be submitted thirty (30) days after receiving the RWQCB comments. A revised schedule for the final design will be provide to the RWQCB as soon as funding is received and the contract is awarded

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As you can see by the discussion above, we are diligently attempting to meet all of the requirements in the orders within available funding. If you have any questions or would like more detailed information on any of these items please contact me at (415) 244-2743.

Sincerely,

Original signed by:

ELDON M. JEMTRUD
Manager, Non-BRAC Closure Bases

Copy to:
California Department of Toxic Substances Control, Region 1 (Attn: Randy Adams)
Navy Fleet and Industrial Supply Center, Oakland (Attn: Richard Hegarty)

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