



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 26, 2000

Mr. Richard Mach Jr.
Southwest Division Naval Facilities
Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5180

SUBJECT: EXTENSION REQUEST FOR PARCEL F, HUNTERS POINT NAVAL SHIPYARD

Dear Mr. Mach:

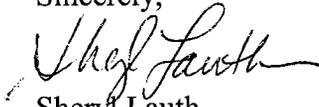
The Environmental Protection Agency (EPA) received your October 19, 2000 letter which provides the Navy's request for an extension to the Parcel F schedule. Per the FFA, EPA agrees that the Navy has provided just cause for the extension request based on the comments submitted on the Parcel F Validation Study Work Plan. However, we would like clarification regarding the Navy's intent to meet the field sampling effort scheduled for August 2000. It was our understanding, based on statements made by the Navy in BCT meetings and in a Navy letter dated August 28, 2000, that the reason the field effort was not initiated in August was because insufficient funds were available to begin the sampling effort for Parcel F.

The FFA states that schedules shall be extended upon receipt of a timely request for extension and when good cause exists for the extension. As stated above, we agree that good cause exists based on the work plan comments, however the Navy's request dated October 19, 2000 was submitted after the August 2000 field effort was missed. We understand that the field effort is not a deliverable under the FFA, however, missing the field effort in August 2000 clearly will result in delays to the validation study report which is a primary deliverable subject to the extension request process under the FFA. As of August 2000, the Navy was aware that the field schedule would not be met and therefore a request for an extension to the validation study report would be required. EPA requests that in the future, the Navy provide the BCT with a timely extension request once the Navy knows that a significant milestone, such as a field sampling effort, will be missed.

We look forward to completing the Parcel F field sampling effort and validation study report. We appreciate the Navy including the human health risk assessment into the schedule and suggest the Navy refer to the human health assessment work plan dated August 27, 1999 as a starting point. Please clarify if a revised work plan will be submitted for the human health assessment. Please provide your clarification regarding the funding of the August 2000 Parcel F

field effort and the human health risk assessment work plan as soon as possible. If you have any questions regarding this letter, please call me at (415) 744-2387.

Sincerely,



Sheryl Lauth

Remedial Project Manager

cc: Mr. Chein Kao, DTSC
Mr. Brad Job, RWQCB
Mr. Mike Wanta, TTEMI
Ms. Karla Braesemle, Weston
Ms. Claire Trombadore, EPA
Mr. John Chester, City of SF