

DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL PROGRAM

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BERKELEY, CA 94710-2737



July 18, 1991

(415) 540-3724

Mr. Michael A. Miguel, R.A.
Head, Environmental Restoration Branch
Office of Environmental Management
WESTDIV, Naval Facilities Engineering Command
P.O. Box 727, Code 181
San Bruno, CA 94066

Dear Mr. Miguel:

**DHS RESPONSE TO THE REQUEST FOR AN EXTENSION OF DEADLINES FOR
DELIVERABLES UNDER THE FFA FOR HUNTERS POINT ANNEX**

Based on our review of your letter dated June 7, 1991 and the subsequent information presented in the meeting on July 11, 1991, the Department of Health Services (DHS) concurs with your request for an extension of deadlines for submitting the Summary of Findings Memoranda (SFM) for Operable Units I, III, and IV, and for the Site Investigation Report for PA-16 and PA-18, at Naval Station Treasure Island, Hunters Point Annex (HPA). In addition, the deadlines for delivery of subsequent documents, listed in the Federal Facility Agreement (FFA), are extended to the dates submitted on the revised schedules for FFA deliverables which were presented at the meeting on July 11, 1991.

However, the DHS is concerned with the lack of communication between the Navy and the DHS regarding the problems encountered with the laboratories. While the Navy was aware of the laboratory backlog as early as January, 1991, full disclosure of the magnitude of the problems was not communicated to the DHS until May, 1991. The Navy stated that the delay was due to the belief that the deadlines for the SFM could still be met, through internal efforts to compensate for the problems encountered. While the DHS is concerned that deadlines be met, and appreciates the efforts made to compensate for the delays that have occurred, that is not our sole concern. The DHS, in its role as a lead regulatory agency, wants, and needs, to be kept fully informed of problems (and subsequent developments) encountered by the Navy, as they arise, regardless of the Navy's ability to meet the deadlines. Failure by the Navy to fully disclose problems as they develop, can only create doubt as to the Navy's openness and candor. Also, by involving the DHS in the early stages of a problem, we may be able to assist in solving the problem.

Naval Station Treasure Island
Mr. Michael A. Miguel
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If you have any questions regarding this letter, please contact me
at (415) 540-3816.

Sincerely,



Barbara J. Cook
Acting Branch Chief
Site Mitigation Branch
Region 2
Toxic Substances Control Program

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