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HUNTERS POINT
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

February 3, 1992

Commander
Western Division
Naval Facilities Engineering Command
Attention: Louise T. Lew, Code 1811
P.O. Box 727
San Bruno, CA 94066-0720

Dear Ms. Lew:

The U.S. Environmental Protection Agency has reviewed your extension request letter of 1/21/92 for the Operable Unit (OU) III schedule. We received your request on January 28, 1992.

Under the terms of the FFA, Section 9.4, we are advising you that we do not concur with this extension request.

Your letter requests an extension for the Summary of Findings Memorandum (SOFM) of 10 weeks, with an adjustment to the schedule for all primary document deadlines following the SOFM. On June 7, 1991 you requested an extension for the SOFM of 14 weeks, which we granted after clarification. Therefore, the total extension requested would be 24 weeks, or a delay of 6 months for the draft Record of Decision.

The current extension request of 1/21/92 states as justification much of the same rationale as the 6/7/91 request, e.g., drilling refusals and laboratory/data validation turnaround. Since these were the problems that necessitated the first extension, it is unclear why greater effort was not made to solve the problems prior to Phase 2B. We are also concerned that these problems are resolved so that other schedules are not adversely impacted by them.

You state that field work was not able to begin until after regulatory concurrence (that field work scheduled to begin 9/30 did not begin until 10/14). However, the 9/23/91 OU III data submittal to the agencies was already behind schedule (originally due 8/29/91). It appears that this delay shortened the review and response time for the OU III data submittal and delayed the initiation of field work. Also, we assume that agency concurrence is only needed for modifications to the approved workplan and that field work that is unchanged should proceed.

We request that you evaluate ways to absorb these delays into the schedule so that the draft RI Report and subsequent dates are not altered. For example, the SOFM could be prepared concurrently with the data validation process and verified at the end of the validation. The Navy SOFM review and revision could occur concurrently with its preparation.

One issue we wish to raise is whether the Navy and its contractors presently have adequate resources (enough manpower) to most expeditiously handle the demands of the Hunters Point Annex schedules.

Your letter states that the problems necessitating the extension request were discussed at the December 4, 1991 TRC meeting. EPA stated it was closely scrutinizing and not favorably looking upon extension requests. We wish to see this and the other OU's stay on schedule, in the interest of expediting base closure and in moving to ROD and clean up.

If you have any questions regarding this letter, please call Roberta Blank at (415) 744-2385.

Sincerely,



Julie Anderson, Chief
Federal Facilities Branch

cc: Bonnie Arthur, DTSC
Bobbie Smith, RWQCB
Ray Chiang, USN
LTC Stephen Walker, DOD