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Ser 1832.2WR/L5195
31 Jul 1995

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities
Engineering Command

To: Distribution

Subj: REMOVAL ACTION DOCUMENTATION AT VARIOUS LOCATIONS,
HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA

Encl: (1) PRC Environmental Management, Inc., letter dtd 26 Jul 95

1. Enclosure (1) is forwarded for your review and reference. It contains the proposed exploratory excavation locations, the excavation criteria, and the tentative removal action documentation schedule for the four removal action projects that were discussed at the 12 July 1995 kickoff meeting. These documents were sent by facsimile transmission (to EPA by inter-office mail) to your offices on 26 July 1995.

2. Please provide any comments on these documents to this office by 10 August 1995. If you have any questions regarding this letter, please contact me at (415) 244-2655.

Original signed by:

RICHARD E. POWELL
By direction of
Commanding Officer

Distribution:

U.S. Environmental Protection Agency (Attn: Ms. Sheryl Lauth)
CAL-EPA, Department of Toxic Substances Control (Attn: Mr. Cyrus Shabahari)
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PRC Environmental Management (Attn: Mr. James Sickles, w/o encl)
Harding Lawson Associates (Attn: Mr. David Leland, w/o encl)

Blind copies to:

62.3, 1832, 1832.2, 09CJC, 09CMN, 1832.1, 1832.3 (wo/encl)
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Activity File: HPA (File: L5195WR.DOC) ab



July 26, 1995

Mr. William Radzevich
Department of the Navy
Engineering Field Activity West
Naval Facilities Engineering Command
900 Commodore Drive, Building 208
San Bruno, CA 94066-2402

**Subject: Removal Action Documentation at Various Locations
Hunters Point Annex, San Francisco, California
CLEAN Contract No. N62474-94-D-7609, Contract Task Order No. 007**

Dear Mr. Radzevich:

PRC Environmental Management, Inc. (PRC), is pleased to submit the rationale for the proposed exploratory excavation locations, the excavation criteria, and the tentative removal action documentation schedule. The exploratory excavation rationale and excavation criteria are summarized below and in Enclosure 1. The removal action schedule is provided as Enclosure 2.

The exploratory excavation rationale presented here will be used as a starting point for the development of the exploratory excavation procedure to be used for the proposed removal action. Further discussion of the exploratory excavation procedure will be contained in the removal action documentation.

Background

During the site inspection (SI) phase of the remedial investigation/feasibility study (RI/FS) at Hunters Point Annex (HPA), the Navy identified several sites for removal actions consisting of limited excavations of small areas associated with visible surface stains. After completion of the SI phase work in the five parcels at HPA, a total of 28 locations were proposed for exploratory excavations. The proposed locations consisted of nine sites in Parcel B, ten sites in Parcel C, nine sites in Parcel D, and none in Parcels A and E (see Table 1).

Concurrent with the SI phase, the Navy conducted a site assessment survey (SAS) of HPA's existing tenants, which focused on potential contamination from the last ten years. The SAS identified an additional six sites for exploratory excavation, four in Parcel D and two in Parcel E.

At the beginning of the RI field work, a total of 34 locations had been proposed for exploratory excavations. To meet the RI reporting schedules, the RI field work included an option for collecting additional chemical and geologic data at the exploratory excavation locations. This additional work consisted of three to four shallow soil borings (plan 2 borings) with an average depth of 10 feet below ground surface, from which two samples were taken. Because of subsequent delays in the

Mr. William Radzevich
July 26, 1995
Page 2

implementation of the exploratory excavations, the additional characterization (plan 2 borings) has been completed in Parcels B and C with minor work left in Parcel D. The additional work at the six exploratory excavation locations proposed under the SAS has not yet been completed. The remaining additional characterization work will be conducted under the current phase of RI field work scheduled for July 1995 through March 1996. All additional characterization data will be reviewed as part of the planning for the exploratory excavation implementation.

Rationale

The initial approach and rationale for exploratory excavations was first proposed in Appendix J of the Draft Final Parcel B Site Inspection Report by Harding Lawson Associates, April 18, 1994 (see Enclosure 1).

Under the SI program, several criteria were used for selecting exploratory excavation locations. Locations were proposed for exploratory excavations using one or more of the following conditions:

- visible staining of surface soil
- limited volume
- low vertical migration potential, based on interpretation of visual observations and analytical results
- the presence of a known source with release potential (e.g., the presence of an aboveground storage tank at the location of visible staining).

Locations were proposed based on surface observations and sampling, and generally without data regarding vertical extent of contamination. Consequently, locations were not proposed based on an upper volume limit, but rather on an interpretation of available data indicating an opportunity for successful early removal of small volumes of contaminated soil without expending resources on further characterization.

Table 1 lists those locations proposed for exploratory excavations at HPA. Table 1 lists the locations by the phase in which they were proposed, SI and SAS, as well as the type of contamination expected based on available surface sample data. The additional characterization data currently being collected is not included in Table 1.

If you have any questions or would like to discuss this letter, please contact me at (415) 222-8240.

Sincerely,



Patrick Wooliever, P.E.
Project Manager

Enclosures (2)

**TABLE 1
EXPLORATORY EXCAVATIONS**

Site Inspection - Exploratory Excavations											
Parcel B		EE Type	Parcel C		EE Type	Parcel D		EE Type	Parcel E		EE Type
Site Num.	Exp. Exc.		Site Num.	Exp. Exc.		Site Num.	Exp. Exc.		Site Num.	Exp. Exc.	
IR-23	EE-08	Hydrocarb.	IR-51	EE-23	PCB - Oil	IR-33	EE-59	Hydrocarb., 1		NONE	
	EE-09	Waste Oil		EE-24	PCB - Oil	IR-36	EE-46	Hydrocarb., 4			
	EE-10	Hydrocarb.	IR-28	EE-99	Hydrocarb.		EE-47	Hydrocarb., 4			
IR-26	EE-14	Hydrocarb., 1		EE-193	Hydrocarb., 2		EE-48	Hydrocarb., 4			
	EE-15	Hydrocarb., 1	IR-29	EE-45	Hydrocarb., 2	IR-37	EE-10	Diesel, PCB			
IR-42	EE-08	Hydrocarb.	IR-29/30	EE-43	Hydrocarb.	IR-53/16	EE-19	Diesel, 2			
IR-51	EE-22	PCB-Oil		EE-44	Hydrocarb., 1		EE-20	Diesel, 2			
IR-57	EE-16	Hydrocarb.		EE-30	Hydrocarb., 3	IR-55	EE-14	Diesel, 4			
	EE-17	Hydrocarb.		EE-31	Hydrocarb., 3		EE-15	Diesel, 4			
			IR-58	EE-	Hydrocarb., 4						
Total EE for Parcel B: 09			Total EE for Parcel C: 10			Total EE for Parcel D: 09			Total EE for Parcel E: None		

Site Assessment Survey - Exploratory Excavations											
Parcel B		EE Type	Parcel C		EE Type	Parcel D		EE Type	Parcel E		EE Type
Site Num.	Exp. Exc.		Site Num.	Exp. Exc.		Site Num.	Exp. Exc.		Site Num.	Exp. Exc.	
	NONE			NONE		SA-117	EE	Hydrocarb.	SA-142	EE	Unknown Oil
						SA-131	EE	Diesel, Oil			
						SA-135	EE	Unknown	SA-146	EE	Waste Oil, Hydraulic & Unknown
						SA-140	EE	Hydrocarb.			
Total EE for Parcel B: None			Total EE for Parcel C: None			Total EE for Parcel D: 04			Total EE for Parcel E: 02		

- 1. Metals
- 2. Metals and PCBs
- 3. Metals and VOCs
- 4. Metals, VOCs, and Pesticides
- EE Exploratory excavation
- SA Site Assessment Site
- IR Installation Restoration Site

Total Exploratory Excavations: 34

ENCLOSURE 1

**DRAFT FINAL PARCEL B SITE INSPECTION REPORT
APPENDIX J**

(Three Pages)

**Draft Final
Parcel B Site Inspection Report
(Including Drydock Area)
Naval Station Treasure Island
Hunters Point Annex
San Francisco, California**

Volume II: Appendixes A through M

Prepared for

Department of the Navy
Base Closure Team
Western Division
Naval Facilities Engineering Command
900 Commodore Drive, Building 101
San Bruno, California 94066

Subcontract 5086-90-057-004, CTO142
HLA Project No. 11400 090502

Under Contract to:

PRC Environmental Management, Inc.
135 Main Street, Suite 1800
San Francisco, California 94105

April 18, 1994



Harding Lawson Associates
Engineering and Environmental Services
105 Digital Drive, P.O. Box 6107
Novato, California 94948 - (415) 883-0112

APPENDIX J
EXPLORATORY EXCAVATION PROCEDURES

APPENDIX J

EXPLORATORY EXCAVATION PROCEDURES

The following lists the conditions necessary, the objectives, and the procedures of performing an exploratory investigation.

- For limited volume excavations.
- Evaluate and excavate surface soil over area of visibly stained soil.
- If field screening* indicates contaminated soil still exists, additional excavation will be performed. Once field screening indicates contaminated soil has been removed, confirmation samples will be collected for laboratory analysis.
- Excavation will continue until concentrations are below the target levels (based on a risk level to be determined for commercial receptors) or until volume/extent of problem has been defined.
- If contamination extends laterally, beyond the limits of the preliminary estimates or extends to the water table, an alternative investigation approach will be developed and submitted for agency approval.

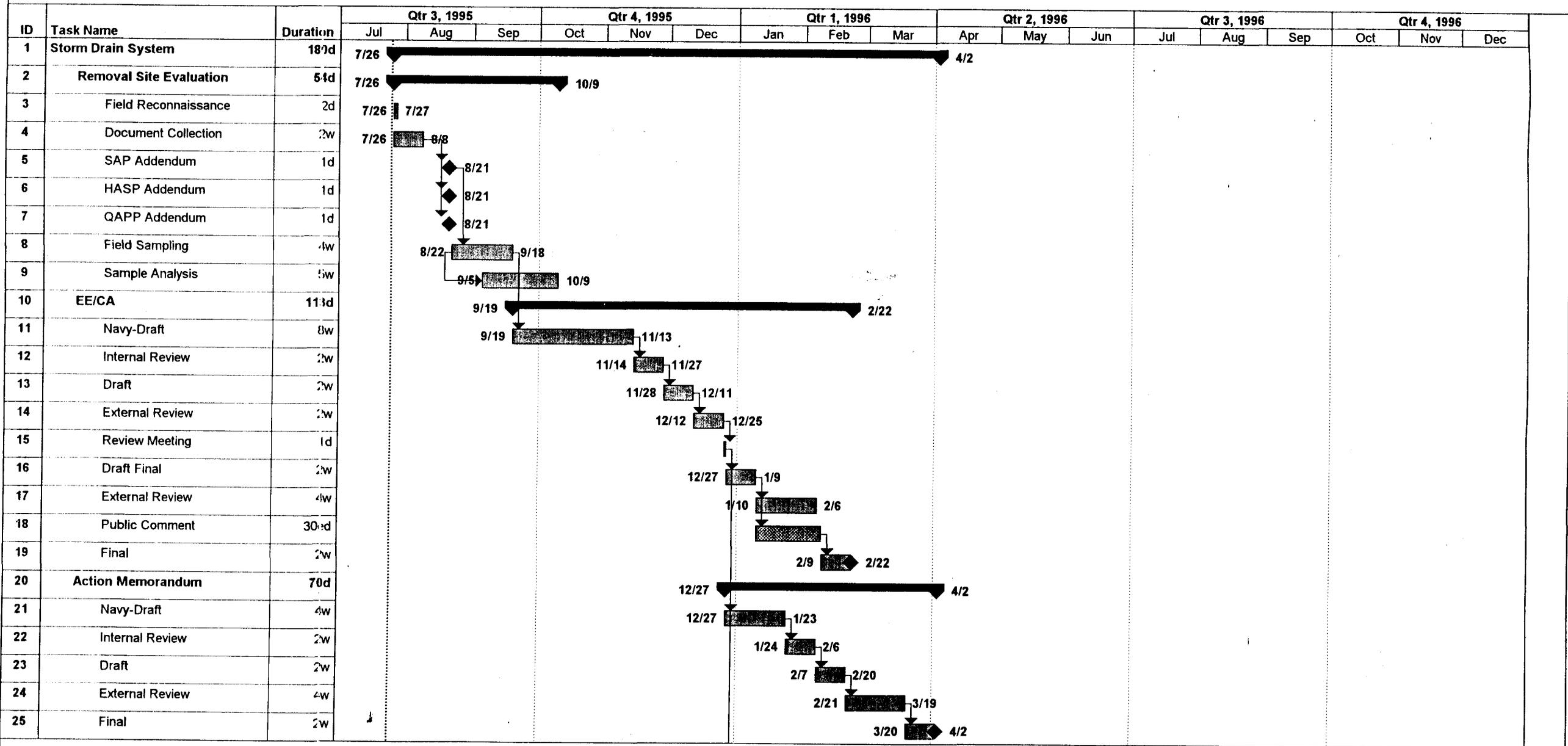
* = Field screening is based on OVA readings, visual observations, and/or immunoassay results. Immunoassay may include analysis for PAH, BTEX, PCBs, TPH, and TOG, depending on the chemicals previously identified or suspected.

ENCLOSURE 2

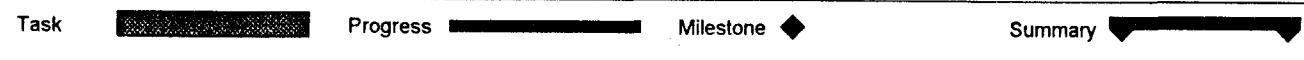
DRAFT REMOVAL ACTION DOCUMENTATION SCHEDULE

(Ten Pages)

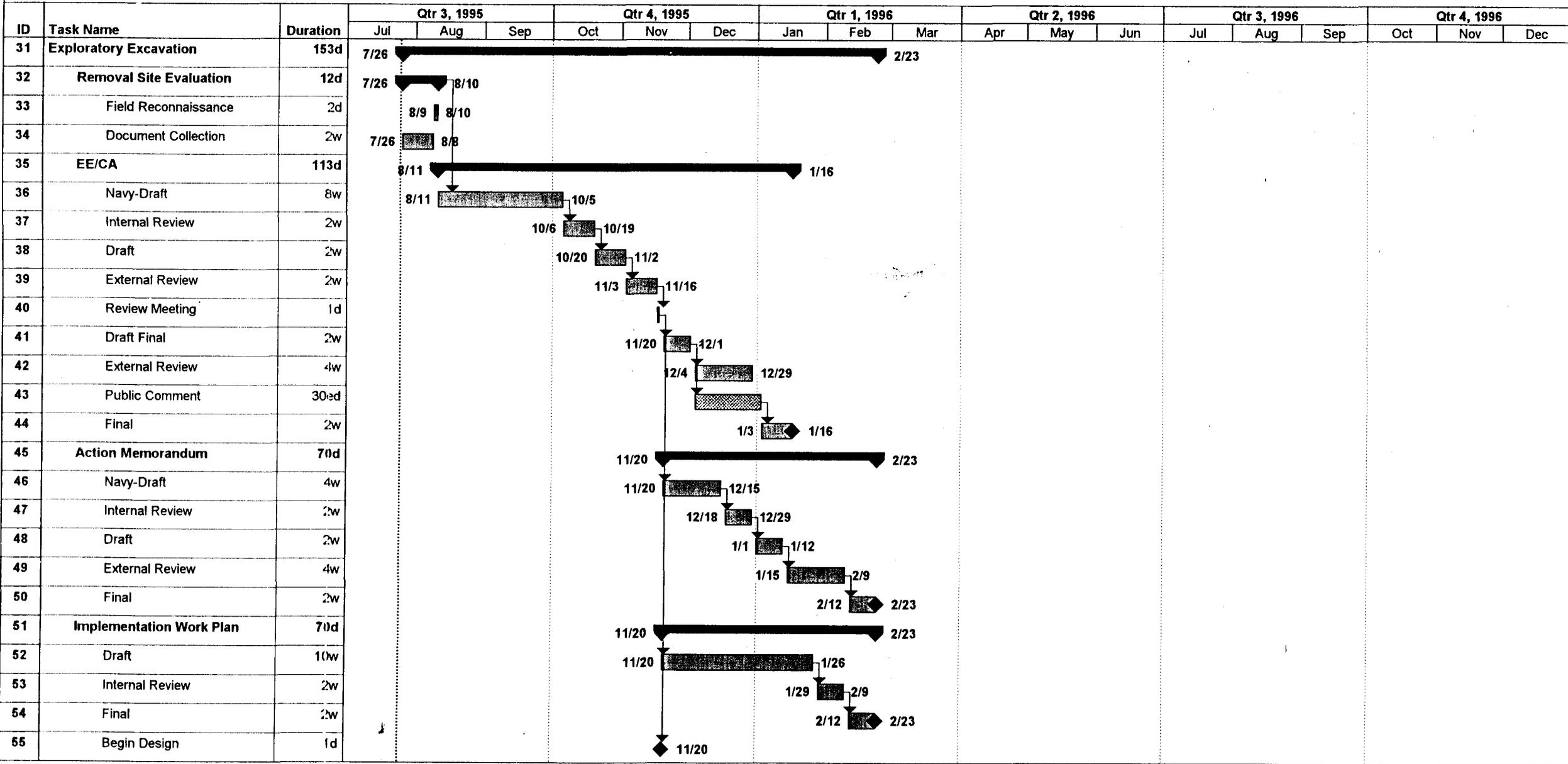
HUNTERS POINT REMOVAL ACTIONS



Project: Hunters Point Removal Action
Date: 7/25/95



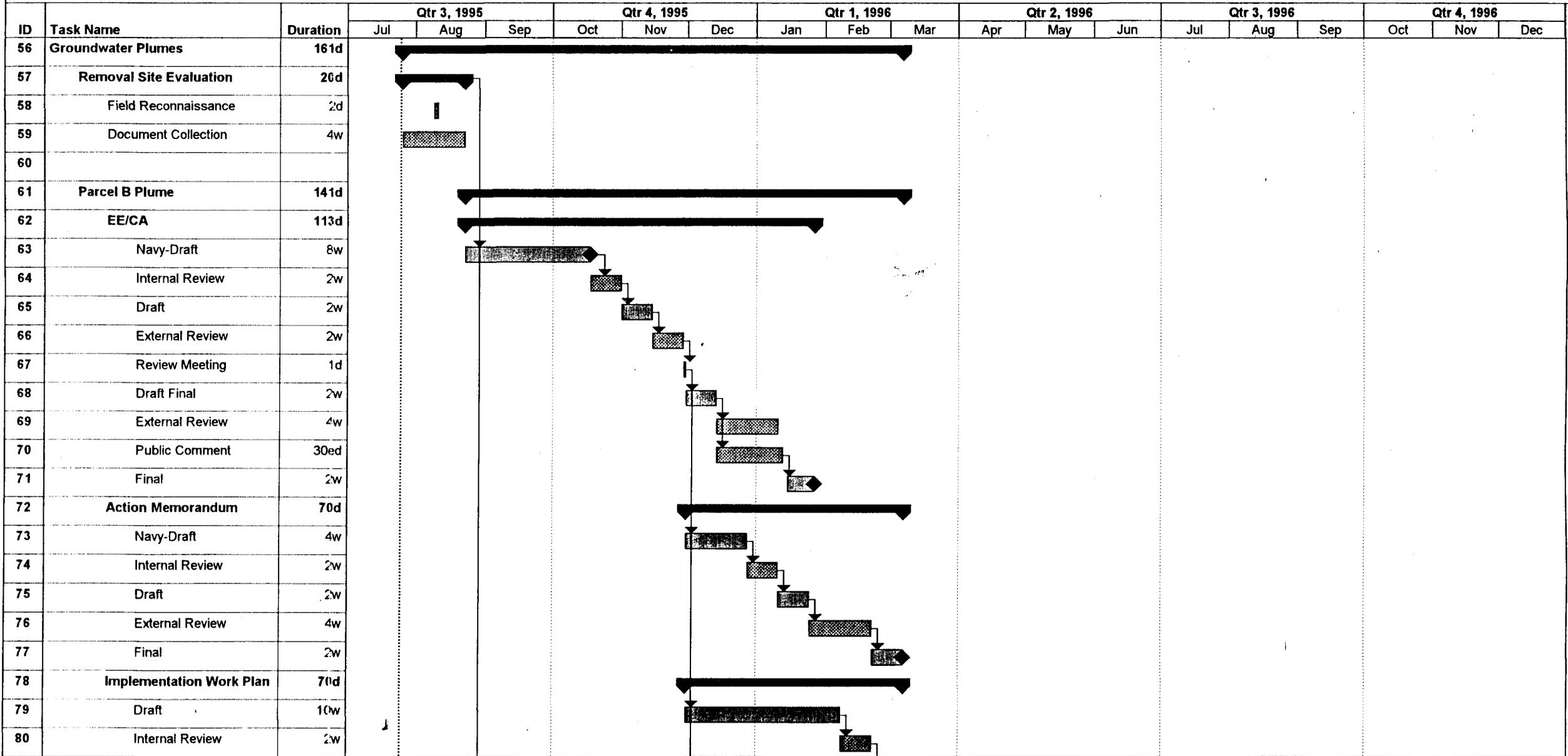
HUNTERS POINT REMOVAL ACTIONS



Project: Hunters Point Removal Action
Date: 7/25/95

Task [Task Bar] Progress [Progress Bar] Milestone [Milestone Diamond] Summary [Summary Bar]

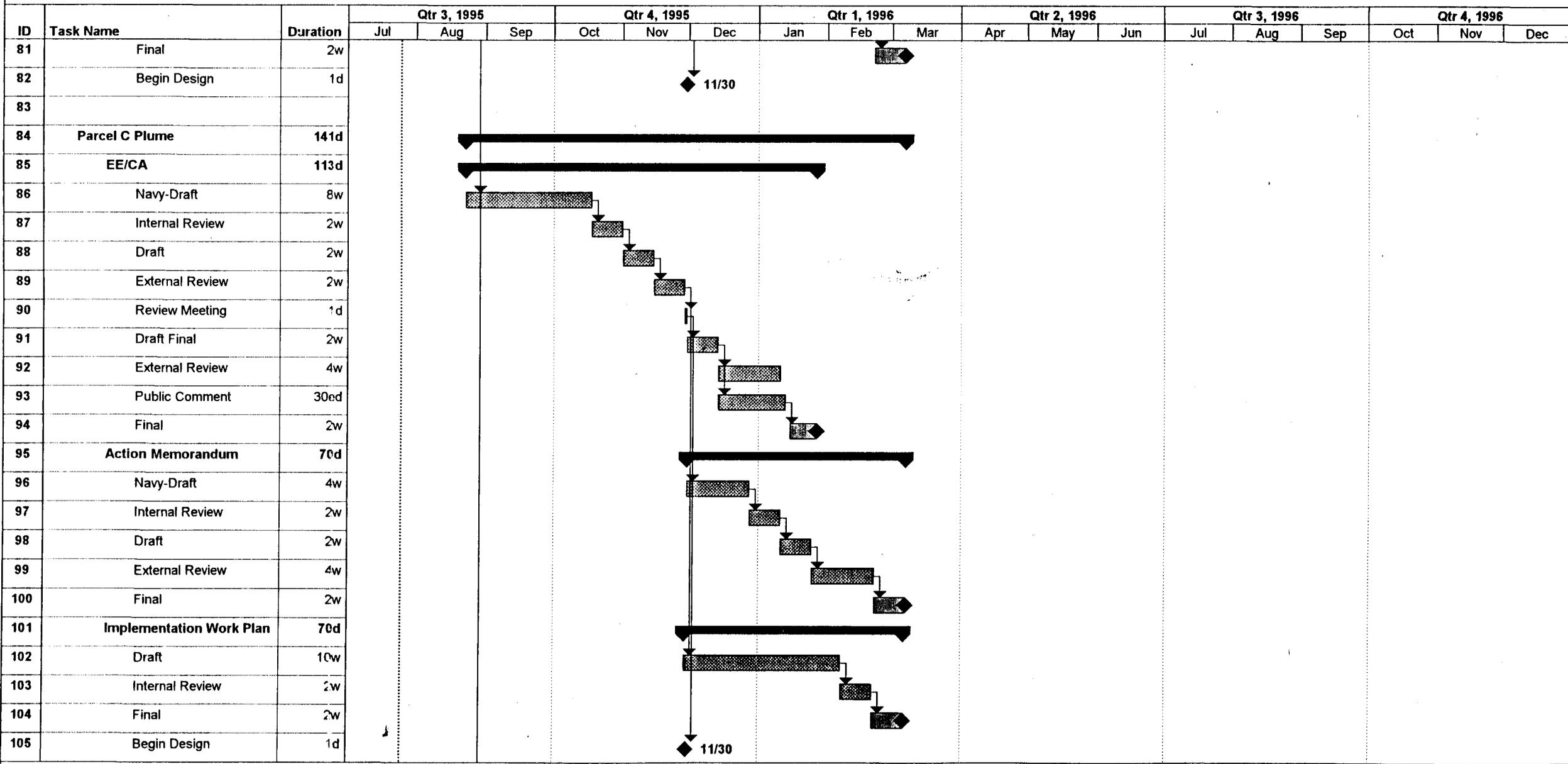
HUNTERS POINT REMOVAL ACTIONS



Project: Hunters Point Removal Action
Date: 7/25/95

Task [Task bar] Progress [Progress bar] Milestone [Milestone diamond] Summary [Summary bar]

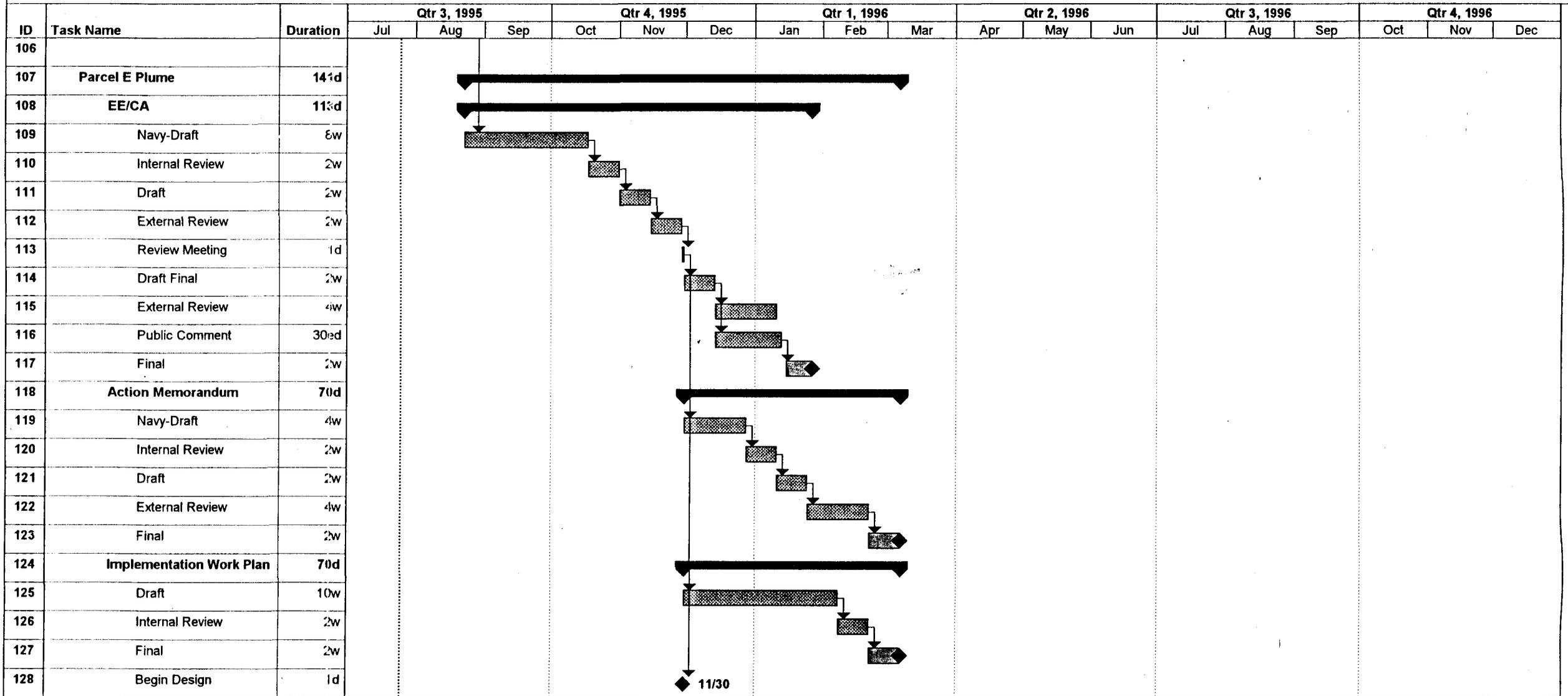
HUNTERS POINT REMOVAL ACTIONS



Project: Hunters Point Removal Action
Date: 7/25/95

Task Progress Milestone Summary

HUNTERS POINT REMOVAL ACTIONS



Project: Hunters Point Removal Action
Date: 7/25/95

Task [stippled bar] Progress [solid bar] Milestone [diamond] Summary [thick arrow]

HUNTERS POINT REMOVAL ACTIONS

ID	Task Name	Duration	Qtr 3, 1995			Qtr 4, 1995			Qtr 1, 1996			Qtr 2, 1996			Qtr 3, 1996			Qtr 4, 1996		
			Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
129	Parcel E Soil and Floating Product (395d	[Summary bar]																	
130	Removal Site Evaluation	395d	[Summary bar]																	
131	Field Reconnaissance	2d																		
132	Document Collection	2w																		
133	Treatability Studies Result	254d	[Summary bar]																	
134	Contaminant Extraction	1d																		
135	Bioremediation	1d																		
136	EE/CA	113d	[Summary bar]																	
137	Navy-Draft	8w																		
138	Internal Review	2w																		
139	Draft	2w																		
140	External Review	2w																		
141	Review Meeting	1d																		
142	Draft Final	2w																		
143	External Review	4w																		
144	Public Comment	30ed																		
145	Final	2w																		
146	Action Memorandum	70d	[Summary bar]																	
147	Navy-Draft	4w																		
148	Internal Review	2w																		
149	Draft	2w																		
150	External Review	4w																		
151	Final	2w																		
152	Implementation Work Plan	70d	[Summary bar]																	
153	Draft	10w	[Summary bar]																	

Project: Hunters Point Removal Action
Date: 7/25/95

Task [shaded box] Progress [solid bar] Milestone [diamond] Summary [arrow]

HUNTERS POINT REMOVAL ACTIONS

ID	Task Name	Duration	Qtr 3, 1995			Qtr 4, 1995			Qtr 1, 1996			Qtr 2, 1996			Qtr 3, 1996			Qtr 4, 1996		
			Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
154	Internal Review	2w																		
155	Final	2w																		
156	Begin Design	1d																↓ ◆ 10/23		

Project: Hunters Point Removal Action
Date: 7/25/95

Task
 Progress
 Milestone
 Summary

HUNTERS POINT REMOVAL ACTIONS

ID	Task Name	Duration	Qtr 1, 1997			Qtr 2, 1997			Qtr 3, 1997			Qtr 4, 1997			Qtr 1, 1998			Qtr 2, 1998		
			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
129	Parcel E Soil and Floating Product (395d	█																	
130	Removal Site Evaluation	395d	█																	
131	Field Reconnaissance	2d																		
132	Document Collection	2w																		
133	Treatability Studies Result	254d																		
134	Contaminant Extraction	1d																		
135	Bioremediation	1d																		
136	EE/CA	113d																		
137	Navy-Draft	8w																		
138	Internal Review	2w																		
139	Draft	2w																		
140	External Review	2w																		
141	Review Meeting	1d																		
142	Draft Final	2w																		
143	External Review	4w																		
144	Public Comment	30ed																		
145	Final	2w																		
146	Action Memorandum	70d	█																	
147	Navy-Draft	4w																		
148	Internal Review	2w																		
149	Draft	2w																		
150	External Review	4w	█																	
151	Final	2w	█	█																
152	Implementation Work Plan	70d	█																	
153	Draft	10w																		

Project: Hunters Point Removal Action
Date: 7/25/95

Task
 Progress
 Milestone
 Summary

HUNTERS POINT REMOVAL ACTIONS

Duration	Qtr 1, 1997			Qtr 2, 1997			Qtr 3, 1997			Qtr 4, 1997			Qtr 1, 1998			Qtr 2, 1998		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
2w	█																	
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1d																		

15.

Begin Design

Project: Hunters Point Removal Action
Date: 7/25/95

Task



Progress



Milestone



Summary

