

5090
Ser 1832.3/L6044
7 Nov 1995

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

To: Distribution

Subj: MONTHLY PROGRESS REPORT FOR OCTOBER 1995 ENGINEERING FIELD
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS
POINT ANNEX, SAN FRANCISCO, CALIFORNIA

Encl: (1) October 1995 Monthly Progress Report

1. Enclosure (1) is forwarded for your information.
2. If you have any questions, please contact the undersigned at (415)244-2571.

Original signed by:

RICHARD E. POWELL
By direction of
the Commanding Officer

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POINT ANNEX, SAN FRANCISCO, CALIFORNIA

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INSTALLATION RESTORATION PROGRAM
MONTHLY PROGRESS REPORT

OCTOBER 1995

NAVAL FACILITIES ENGINEERING COMMAND
HUNTERS POINT ANNEX

1. PROGRESS DURING THE REPORT PERIOD

The following activities were accomplished during the report period:

Field Work: Remedial investigation field activities in Parcels B and C continued. Samples were collected and tested for dense non-aqueous phase liquids (DNAPLs) at Building 134 located in IR-25 in Parcel B, and at Building 272 located in IR-28 in Parcel C. The field work remaining for these two parcels includes cleanout of several floor vaults, and a round of water levels facility-wide. Depending on contractual factors, some of this field work may or may not be combined with the remaining field work at the site assessment sites. Routine waste management tasks are on-going.

Work being conducted in Parcels D and E includes ongoing posting of sample locations on maps, input of the sample information and results from validated data into the chemical database, input of the boring log data into the database, and interpretation of the results. Parcels D and E base maps were updated to include recently surveyed boring locations.

Remaining field work in all of the parcels, which includes the remaining CTO 276 Parcels D and E fieldwork and the site assessment sites, continued in October. All Parcel B borings have been completed. Parcel D borings are expected to be completed in October with the exception of the limited access drilling in Parcel D buildings.

Parcel A: No comments were received on the draft final Parcel A remedial investigation (RI) report within the 30 day comment period. The draft final Parcel A RI report became final on October 23, 1995.

Comments on the preliminary draft Parcel A Record of Decision (ROD) were received on October 2, 1995 and were incorporated into the document. The Navy completed the Parcel A Responsiveness Summary and attached it to the ROD approximately a month and a half ahead of schedule. The draft Parcel A ROD and Responsiveness Summary were sent to the regulatory agencies for review and comment on October 5, 1995.

Comments on the draft Parcel A ROD were received from the Department of Toxic Substances Control (Department) on October 27, 1995. EPA comments were expected on November 1, 1995.

The process of transferring Parcel A from the Navy to the City of San Francisco continues on schedule with the delivery of the draft ROD during the month of October. The next step in the process consists of incorporation of the agencies' comments and submittal of the draft final ROD in mid-November.

The Parcel A storm water sampling analytical results are currently being evaluated. This report is expected to be available for Navy review in late November 1995, and for regulatory review in December, 1995.

RI Reports: Progress was made in the preparation of the Parcel B RI report. A scoping/briefing session was held on October 18, 1995. In attendance were the Navy remedial project manager (RPM), regulatory agencies, CLEAN II team members and CLEAN I team members. The session focused on the approach and methodologies used in the preparation of this report. Progress is on-going in the preparation of the Parcels D, C, and E RI reports.

Air Monitoring: The Navy received EPA's comments on the draft Phase II Air Monitoring report for HPA on October 18, 1995. The response to comments will be attached to the draft final Phase II Air Monitoring report which is due on December 18, 1995. It is Navy's intention to distribute the draft final Phase II Air Monitoring report to the restoration advisory board (RAB) members, along with the public summary.

Background Levels: The Navy received the Department's comments on the Hunters Point Ambient Level (HPAL) report on October 2, 1995. The Navy is responding to the comments received and formulating a strategy to formalize the ambient values for use in future work.

Removal Actions: At the Pickling and Plate Yard (IR-9) removal action project, work continued on the removal of contaminated materials. The Navy prepared a field variance (number 05) regarding the proposal to delete further air monitoring for semivolatile organic compounds. The Navy developed and issued recommendations to the Public Work Center (PWC), the contractor in charge of this removal project, for concrete sampling, dust control procedures, and solid debris screening. The disposal of secondary containment vault liquids was documented. During this period, the preparation of a field variance (number 06) was initiated to address the disposal of concrete debris as hazardous waste versus decontamination of the concrete debris prior to recycling. PWC estimates that this project will be completed in December 1995.

General progress on the preparation of the documentation to support the removal actions identified as having the highest priority was as follows: (1) Development of potential removal action scenarios. Screening criteria for each of the removal projects, except for the soils and floating products in Parcel E, were identified. (2) A response from the Department to an ARARs request was received. No ARARs were identified in the letter, although the Department expressed their willingness to assist in the process at a later date. (3) A schedule was submitted showing all deliverables for the removal projects in relation

to the Federal Facility Agreement (FFA) deliverables. Specific progress on each of the removal projects is as follows:

Repair of Storm Drains and Removal of Sediments: (1) The geographical informational system (GIS) map summarizing reaches of the storm drain with potential for infiltration of contaminated groundwater was completed. (2) Potential sampling locations have been identified and will be presented in mid-November. (3) The addenda to the quality assurance project plan (QAPP), sampling and analysis plan (SAP) and health and safety Plan (HASP) has been completed and will be submitted when the sampling locations are finalized.

Exploratory Excavations: The preliminary draft Engineering Evaluation/Cost Analysis (EE/CA) was completed and undergoing Navy's internal review.

Pilot Study, IR-6 Tank Farm: The preliminary draft Engineering Evaluation/Cost Analysis (EE/CA) was completed and undergoing Navy's internal review.

Groundwater Plumes: The data for each identified plume was compiled and screened against identified screening levels and the extent of the plumes was determined. A list of alternatives for consideration in the EE/CA was completed. A meeting with the Remedial Action Contract (RAC) contractor to review the alternatives and obtain their input is scheduled for next month. The EE/CAs for the plumes identified in Parcels B, C, and E are partially complete.

Removal of Contaminated Soils and Floating Product at IR-3: Work on this project is dependent on the chemical/physical (steam and surfactant) treatability study under CTO 0196 (CLEAN I). The CLEAN II team met to review the data.

Ecological Risk Assessment: Progress on the implementation of the Ecological Risk Assessment Phase 1B work consisted of: (1) Procurement for the implementation of the Phase 1B field work which is scheduled to begin November 13, 1995. (2) Coordination with EPA's subcontractor and quality assurance personnel for a scheduled field audit and split sampling program. (3) Progress was made in the preparation of the Parcel F Preliminary Assessment (PA) report which is scheduled for delivery on December 18, 1995.

Radiation Issues: (1) The Navy is preparing a response to comments received on the draft Parcel B and E Subsurface Radiation Investigation report. Navy's responses are due in November 1995. (2) The low level radioactive waste storage bin in Building 130 was manually ventilated to reduce the concentration of radon gas. This is an on-going monthly activity. (3) The Navy is preparing the work plan for the radiation survey of former Naval Radiological Defense Laboratory (NRDL) and Formerly Used Defense Sites (FUDS). Currently, the Navy is trying to contact current owner/operators of these buildings to gain access to these buildings. (4) The Navy is investigating the possibility of preparing an EE/CA regarding the alternatives and costs associated with the removal of radium dials in the HPA landfill. This issue becomes problematic because of the presence of organic and

inorganic contamination in the landfill. A meeting on November 7, 1995 has been scheduled to discuss this issue. (5) The Navy has submitted the chemical analysis on the IDW drums to RASO for Chem NUC's review prior to resumption of work on the screening of the IDW drums for radioactivity. Once RASO and Chem NUC have received the data, a detailed schedule will be submitted to the agencies for review.

Basewide Environmental Baseline Survey (EBS): Progress was made in the preparation of the basewide EBS for HPA. The visual site inspection, title review, and aerial photograph analysis tasks are completed. On-going activities include program review, database tasks, and adjacent property survey. The draft Basewide EBS report is due to the agencies for review on February 28, 1995.

Community Relations: Preparation of the revised Community Relations Plan (CRP) continued, with activities consisting of scoping and coordination efforts for the interview task. A preliminary schedule to conduct the community interviews was prepared. The interviewee list was finalized and scheduling of interviews has started.

2. REPORTS SUBMITTED AND MEETINGS

Meetings

- Parcel B briefing/workshop at PRC October 18, 1995.
- BRAC Clean-up Team (BCT/RPM) meeting at PRC October 24, 1995.
- RAB meeting on October 26, 1995.

Submittals

- Draft final Parcel A RI report became final on October 23, 1995.
- Draft Parcel A ROD and Responsiveness Summary submitted to the regulatory agencies on October 5, 1995 for review and comments. The Department's comments were received on October 27, 1995. EPA's comments were expected November 1, 1995.

3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

Background Levels: The approach to calculating the background levels for metals in soils (HPALs) at HPA was agreed to by the Navy and the regulatory agencies on January 17, 1995. After review by the regulatory agencies, Dr. Frampton with the Department had concerns with the data set used in calculating the new HPALs and with the approach used. PRC recalculated the HPALs using Dr. Frampton's recommended approach and in general, the revised HPALs results were higher. On October 2, 1995, the Navy received a letter from the Department stating that the ambient level concentration submitted by the Navy on

August 17, 1995 were accepted with the exception of the chromium, cobalt, and nickel ambient level concentrations. In this letter, the Department also accepted the regression coefficients and corrected correlation coefficients for chromium, cobalt, and nickel. The Department stated that the acceptance was done with the understanding that additional data has not been reviewed by the Department, and that they believe that a portion of the antimony data is erroneous due to laboratory error. The Navy is in the process of preparing a position paper summarizing the Navy's understanding regarding ambient levels at HPA and the proposed action. This letter is expected to be submitted to the agencies in mid-November.

Offsite Access for RI Work: The Navy is attempting to gain access to the offsite property adjacent to IR-18 in Parcel B. Subsurface contamination along Navy's facility boundary appears to extend northwest onto adjacent private property. A discussion is underway between Navy's counsel and the property owner. The Parcel B RI report will report any information if available at the time of its preparation. If additional work is required it will be reported in later documents. Resolution is pending.

Parcel Boundary Modifications: The San Francisco Redevelopment Agency (SFRA) requested the BCT to modify the current installation restoration boundaries between Parcels B and C, and D and E in order to facilitate the City's timely marketing of clean parcels. The BCT felt that at this time boundary changes will cause FFA schedule delays, specifically the Parcel B RI report. For this reason, the BCT has determined that the SFRA request could not be accommodated, and a letter was sent to this effect. Further discussions have been offered by the BCT to SFRA to possibly reach some accommodation to both meet the FFA schedules and the City's desire to market parcels of land. Resolution is pending on further discussions.

PCB Occurrences: EPA expressed some concern regarding the widespread occurrence of polychlorinated biphenyls (PCB) at low levels site wide. The Navy is preparing a response that evaluates locations with PCB concentrations that exceed 1 mg/kg to determine an appropriate response action. Response delayed in order to include PCBs in groundwater as a topic. This response is expected to be submitted in December 1995.

4. REPORTS AND ACTIVITIES FOR NOVEMBER 1995

Documents Scheduled for November 1995 Submittal

Final Parcel A ROD with Responsiveness Summary is scheduled for delivery to the agencies for signatures on November 16, 1995. The final Parcel A ROD with signatures is scheduled for November 30, 1995.

Parcel A Storm Drain Monitoring report is expected to be available for Navy review in late November 1995.

Response to comments on the IR-3 Treatability Study Work Plan on November 22, 1995.

Response to regulatory agency and ARC Ecology comments on the results of the Draft Subsurface Investigation in Parcels B and E report due November, 1995.

Draft Final Exploratory Excavation EE/CA on November 28, 1995.

FUDS work plan.

Activities Planned for November 1995

Field Investigations: Continue with the implementation of the RI field work for Parcels B, C, D, and E. Tasks include drilling, excavating, surveying, concrete coring, monitoring well installation, sump cleanup and others.

Start the implementation of the Ecological Phase 1B field work. Start date is scheduled to be November 13, 1995. An EPA field audit is scheduled to take place on November 15, 1995.

Air Monitoring: Continue with the preparation of the responses to comments for the draft Phase II Air Monitoring report.

Removal Actions: Continue removal actions at the Pickling and Plate Yard (IR-9) project.

Continue preparation response to comments on the agency comments for Dry Dock 4 removal action document (EE/CA).

Submission of Draft EE/CA to RAB and agencies.

Preliminary Draft Field Work Plan for IR-6 Pilot Study due for Navy's internal review.

Submission of bench scale testing report for Tank Farm (IR-6) soil remediation removal action for Navy's internal review.

Continue the preparation of the draft QAPP, SAP, and HASP to support the storm drain removal action due for Navy's internal review on November 24, 1995.

Draft Parcel C Plume EE/CA due to the Navy November 17, 1995. Draft Parcel E Plume EE/CA due for Navy's internal review on November 24, 1995.

Continue with the preparation of the response to comments regarding the IR-3 Treatability Work Plan.

Radiation Issues: Prepare for the radiation screening of NRDL sites, following acceptance of a proposed work plan to be submitted to the agencies. Prepare response to comments on the Intertidal Sampling and Analysis Plan.

Technical Memoranda/Position Papers: Continue with the preparation of the filtered/unfiltered/slow purge groundwater sampling report.

Continue with the preparation of Navy's response regarding locations at HPA with PCB soil concentrations greater than 1 mg/kg. Include PCBs in groundwater.

Continue the preparation of Navy's response regarding HPALs.

BCT Activities: Prepare for the monthly BCT/RPM meeting scheduled December 5, 1995.

Continue with the preparation of a Master Schedule for all deliverables to avoid review and schedule conflicts. Mike McClelland is taking the lead on this task.

Prepare for the RAB meeting on November 15, 1995 at 6:00 PM.

5. KEY PERSONNEL CHANGES

None.

6. PERCENTAGE OF PROJECT COMPLETION

Please note that the listing of percentage of project completion has been substantially revised to better reflect ongoing project activities. Those sections dealing with previously conducted work in the organizational limits such as OUs and groups have been incorporated into the parcel-wide RI work. In addition, a new section addressing the treatability studies and removal actions has been added for a more complete description of project activities.

ACTIVITY/DELIVERABLE PERCENTAGE COMPLETE

PARCEL B

· SI Sampling, Analysis and Interpretation	100%
· Draft SI Report	100%
· Draft Final SI Report	100%

RI Work (Excluding Site Assessment Sites)

· RI Sampling	98%
· RI Lab Analysis/Data Validation	92%

<u>ACTIVITY/DELIVERABLE</u>	<u>PERCENTAGE COMPLETE</u>
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· RI Data Management/Interpretation	90%
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RI Work at Site Assessment Sites

· RI Sampling	60%
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· RI Lab Analysis/Data Validation	40%
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· RI Data Management/Interpretation	40%
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RI Work (Including Site Assessment Sites)

· RI Data Presentation	50%
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· Draft RI Report	50%
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· Draft Final RI Report	0%
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PARCEL C/DRY DOCK NO. 4

· SI Sampling, Analysis and Interpretation	100%
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· Draft SI Report	100%
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· Draft Final SI Report	100%
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RI Work (Excluding Site Assessment Sites)

· RI Sampling	96%
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· RI Lab Analysis/Data Validation	95%
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· RI Data Management/Interpretation	93%
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RI Work at Site Assessment Sites

· RI Sampling	15%
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· RI Lab Analysis/Data Validation	5%
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· RI Data Management/Interpretation	0%
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ACTIVITY/DELIVERABLE**PERCENTAGE COMPLETE****RI Work (Including Site Assessment Sites)**

· RI Data Presentation	0%
· Draft RI Report	0%
· Draft Final RI Report	0%

PARCEL D

· SI Sampling, Analysis and Interpretation	100%
· Draft SI Report	100%
· Draft Final SI Report	100%

RI Work (Excluding Site Assessment Sites)

· RI Sampling	100%
· RI Lab Analysis/Data Validation	96%
· RI Data Management/Interpretation	94%

RI Work at Site Assessment Sites

· RI Sampling	35%
· RI Lab Analysis/Data Validation	15%
· RI Data Management/Interpretation	5%

RI Work (Including Site Assessment Sites)

· RI Data Presentation	15%
· Draft RI Report	5%
· Draft Final RI Report	0%

ACTIVITY/DELIVERABLE**PERCENTAGE COMPLETE****PARCEL E**

· SI Sampling, Analysis and Interpretation	100%
· Draft SI Report	100%
· Draft Final SI Report	100%

RI Work (Excluding Site Assessment Sites)

· RI Sampling	100%
· RI Lab Analysis/Data Validation	95%
· RI Data Management/Interpretation	85%

RI Work At Site Assessment Sites

· RI Sampling	30%
· RI Lab Analysis/Data Validation	10%
· RI Data Management/Interpretation	2%

RI Work (Including Site Assessment Sites)

· RI Data Presentation	0%
· Draft RI Report	0%
· Draft Final RI Report	0%

TREATABILITY STUDIES/REMOVAL ACTIONS**QUI Sites**

· Draft IR-3 Treatability Study work plan for:

(1) Chemically and Thermally Enhanced Recovery	100%
(2) Bioremediation	100%

ACTIVITY/DELIVERABLE**PERCENTAGE COMPLETE**

Draft Final IR-3 Treatability Study Work Plan for:

- | | |
|--|------|
| (1) Chemically and Thermally Enhanced Recovery | 100% |
| (2) Bioremediation | 65% |

Pickling & Plate Yard, IR-9

- | | |
|--|-----|
| Implementation of Removal Action at Pickling and Plate Yard, IR-9 | 65% |
| Draft Summary Report of Removal Actions at Pickling and Plate Yard, IR-9 | 0% |
| Draft Final Summary Report of Removal Actions at Pickling and Plate Yard, IR-9 | 0% |

Soil at IR-6, Tank Farm

- | | |
|---|------|
| Implementation of Removal Action of Soil and Free Product in Soil at IR-6 | 20% |
| Draft Summary Report of Removal Action of Soil and Free Product in Soil at IR-6 | 0% |
| Draft Final Summary Report of Removal Action of Soil and Free Product in Soil at IR-6 | 0% |
| Soil Sampling for Bioremediation Bench Scale Study | 100% |

Sandblast Grit Recycling

- | | |
|--|------|
| Implementation of Sandblast Grit Recycling at OU I | 100% |
| Draft Summary Report of Sandblast Grit Recycling at OU I | 0% |
| Draft Final Summary Report of Sandblast Grit Recycling at OU I | 0% |

ACTIVITY/DELIVERABLE

PERCENTAGE COMPLETE

EE/CA

· EE/CA for Storm Drain System	40%
· EE/CA for Floating Products in IR-3	35%
· EE/CA for Groundwater Plumes in Parcels B, C, and E	60%
· EE/CA for Exploratory Excavations	90%

FACILITY-WIDE INVESTIGATIONS

· Draft Phase II Air Sampling Report	85%
· Ecological Risk Assessment Phase IA	100%
· Preparation of Ecological Risk Assessment Phase 1B Work Plan	100%
· Ecological Risk Assessment Phase 1B Implementation	0%
· Quarterly Groundwater Monitoring Implementation (OU II sites)	94%
· Hydrogeologic Conceptual Model Technical Report	100%
· Site-wide Radiological Assessment	30%



RICHARD POWELL
LEAD REMEDIAL PROJECT MANAGER

12-8-95

DATE