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Ser 1832.3/L6115  
20 Feb 1996

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

Subj: MONTHLY PROGRESS REPORT FOR JANUARY 1996 ENGINEERING FIELD  
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS  
POINT ANNEX, SAN FRANCISCO, CALIFORNIA

Encl: (1) January, 1996, Monthly Progress Report

1. Enclosure (1) is forwarded for your information.
2. If you have any questions, please contact the undersigned at (415) 244-2655.

**Original signed by:**

RICHARD E. POWELL  
By direction of  
the Commanding Officer

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**INSTALLATION RESTORATION PROGRAM  
MONTHLY PROGRESS REPORT**

**JANUARY 1996**

**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 fieldwork has been completed for Parcels B and C with the exception of (1) surveying of monitoring wells in Parcel C which is underway, (2) potential step-out borings/wells in Parcel C, which will be selected after analysis of the analytical results from recently complete borings, and (3) proposed off-site borings near IR-18.

The field work continued in Parcels D and E. Soil borings were advanced and monitoring wells were installed. Outstanding work at these parcels consists of: first, sampling at the three formerly used defense sites (FUDS) in Parcel E (the preparation of the field sampling plan for the proposed work at the three FUDS was completed and submitted to the agencies for review); second, sump clean out and borings adjacent to the sumps in Building 411 (Parcel D) (the sumps have been cleaned out and sampling of adjacent borings is being conducted); and third, surface soil samples to be collected in burn areas of Parcel E (a list is currently being compiled of surface soil samples to be collected in the burn areas of Parcel E, these soil samples will be analyzed for dioxins and furans).

Several buildings in Parcels B, C and D may pose a risk regarding inhalation of vapors due to solvents in the underlying soils. To determine the actual risk, an air sampling program is being considered to be conducted concurrently with the ongoing field work. The air sampling would be conducted inside the buildings with one set of samples taken at the breathing level of occupants and one set of air flux samples to be taken beneath the existing building floor. A total of 11 sample locations in 8 buildings in Parcels B, C, and D are proposed with sampling to be conducted in February 1996.

- The offshore sampling supporting the Phase 1B Ecological Assessment was conducted at 16 sampling stations, reference stations, and core samples. Additional tissue sampling to obtain sufficient material has been extended into the first two weeks of February. Chemical and bioassay analyses have begun with an anticipated completion by the end of April, 1996.
- **Parcel A:** The process of transferring Parcel A from the Navy to the City of San Francisco continues on schedule. The last requirement for the finalization of the Parcel A Record of Decision (ROD) consists of a formal notification in the local newspaper announcing the signing of the document and its availability to the public. The notification will be published in February, after the Navy ensures the listing of documents in the administrative record is complete.

The next step in the transfer process consists of the preparation of the Environmental Baseline Survey (EBS) and Finding of Suitability to Transfer (FOST) documentation, along with the preparation of the Environmental Impact Statement/Report (EIS/R). The scoping for the preparation of the Parcel A EBS/FOST documentation will be performed in February with the Navy and its contractors, followed by a scoping meeting with the agencies in early March.

Clean out of the Parcel A storm drains has been completed. The analytical results have been evaluated. The Parcel A Storm Water Monitoring Report is being reviewed by the Navy.

The final item concerning Parcel A consists of the preparation of a Notice of Well Abandonment for those monitoring wells installed during the RI. Following concurrence from the City of San Francisco and the BRAC Closure Team, the Navy will prepare the notice, and will perform the actual abandonments.

- **RI Reports:** The Draft Parcel B RI Report was delivered to the regulatory agencies on January 31, 1996 for review. A meeting to discuss the agencies' preliminary comments or questions is scheduled for March 6, 1996 with written comments due on March 18, 1996. The alternative HHRA approach preferred by the agencies will be prepared concurrently and be delivered as an addendum on February 29, 1996. After evaluation of both approaches, the results will be incorporated in the draft final Parcel B RI report, along with an HHRA based on the agencies' approach. Progress is ongoing 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. The Navy is currently addressing the agencies' comments and evaluating the need for building specific air sampling. Included with the responses to comments will be the proposed building specific air sampling locations to complete the RI fieldwork. The draft final is expected to be submitted in February, 1996.
- **Background Levels:** The Navy received a letter dated October 2, 1995 from the Department of Toxic Substances Control (Department) on the Hunters Point Ambient Level (HPAL) Report. The Navy is evaluating its response to this letter and expects to deliver it in February.
- **Removal Actions:**

Pickling and Plate Yard (IR-9): This removal action is being conducted by Public Works Center San Francisco Bay (Public Works). Work continued on the removal of contaminated materials. As a result of the decision to construct a roof over the containment vault (which is a variation from the work plan) and because of complications due to unfavorable weather conditions, the schedule for the removal action has been extended. The new estimated completion date for this removal action is March 1, 1996. Public Works is in the process of preparing a revised schedule.

Exploratory Excavations: This work is being performed by PRC Environmental Management Inc. (PRC) and IT Corporation. The draft final Exploratory Excavation

Engineering Evaluation/Cost Analysis (EE/CA) was distributed to the regulatory agencies for review. As a result of concerns regarding ARARs analysis, a meeting is scheduled between the Navy and the agencies in early February. Following this meeting, the need for any schedule changes would be revisited.

Groundwater Plumes: This work is being performed by PRC and IT Corp. The Navy concluded their review of the groundwater EE/CAs for Parcel C, Parcel E, and Parcel B, and the EE/CA's were submitted to the agencies for review in January. As a result of agencies' concerns regarding the scope of these groundwater removal actions, a meeting is scheduled between the Navy and the agencies in early February.

Removal of Contaminated Soils and Floating Product at IR-3: This work is being performed by PRC. The Navy decided to incorporate the IR-3 treatability studies, thermal and chemical enhanced product removal and ex-situ biodegradation, which were considered under CTO 196, into the IR-3 removal action as potential alternative technologies. Levine-Fricke, PRC's team firm, has begun work in this project and expects to set up a scoping meeting between the Navy and regulatory agencies in mid-February, 1996.

Repair of the Storm Drains and Potential Removal of Sediments: This work is being performed by PRC and IT Corporation. The field work to collect ground water samples was conducted in mid-January 1996 for this removal to determine storm drain system reaches with potential for infiltration of contaminated groundwater. The sampling results will be incorporated into the EE/CA, which is scheduled for submittal in April 1996.

Sandblast Removal: This work was performed by Battelle. A summary report and a technical transfer document was submitted to the agencies in January, 1996.

Tank Farm (IR-6) Removal: This work is being performed by Navy's public Works Center. The Navy submitted to the agencies for review the Draft EE/CA in early December. Agency comments were provided in January.

Sediment Removal at Dry dock 4: This work is being performed by Mare Island Shipyard (MINS). The agencies provided comments on the EE/CA submitted by MINS two months ago. Navy will be submitting new schedules for this removal action. Additional sampling to be conducted in February to conduct modified WET tests for bay water exposure.

- Ecological Risk Assessment Phase 1B: The preparation of the Draft Preliminary Assessment (PA) for Parcel F Report is in Navy's internal review. The report will be submitted for agency review in February 1996.
- Radiation Issues: (1) The Navy is preparing a response to the DHS comments received on the draft Parcel B and E Subsurface Radiation Investigation Report. The EPA has evaluated the response to comments and accepted the report in January, 1996. (2) The low-level radioactive waste storage bin in building 130 was manually ventilated to reduce the radon gas concentration. This is an ongoing monthly activity. (3) No additional radiation-related field work is required at IR-7/18. The final results of the surface and subsurface radiation investigation in IR-7/18 were discussed in the draft Parcel B RI Report. (4) The Navy is preparing a technical paper to evaluate the alternatives, costs, public perception, and other factors associated with the removal of radium dials in the landfill. This issue

becomes problematic because of the presence of organic and inorganic contamination in the landfill. (5) The Navy has received internal comments from the Radiological Affairs Support Office (RASO) on the draft Phase III Radiation Investigation work plan for submittal to the agencies in February. (6) The Navy received comments from the Department of Health Services, the Department, and EPA on the draft OU-I Intertidal Sampling and Analysis Plan Work Plan. The Navy is preparing a response to the comments received. (7) An internal Navy meeting was held in January to discuss the screening and disposal of IDW drums.

- **Community Relations:** The Draft Community Relations Plan was submitted to the Navy for review on January 31, 1996 and is due to the agencies on February 14, 1996. At the request of the EPA, four additional questionnaires will be distributed to community members for inclusion in the draft final CRP. The additional input should allow input from those unavailable earlier, as well as reflect the recently elected City of San Francisco administration.
- **Environmental Baseline Survey (EBS):** Progress continues in the preparation of the Draft EBS. Ongoing tasks include programs review, database tasks, and adjacent property survey. The draft EBS is due to the Agencies for review on February 28, 1996.

## 2. REPORTS SUBMITTED AND MEETINGS

### Meetings

- A BCT meeting took place on January 4, 1996 to discuss the poster presentation for the January 24, 1996 RAB.
- Navy attended a meeting with its contractors concerning the radiological screening of the IDW on January 16, 1996.
- The BCT/RPM meeting took place on January 17, 1996.
- RPM's attended a Conversion Management meeting with the San Francisco Redevelopment Agency (SFRA).
- A RAB meeting was held on January 24, 1996.
- Navy met on January 30, 1996 with the agencies to discuss the Exploratory Excavation and the Groundwater Removal Action EE/CAs.

### Submittals

- The draft Parcel B RI report was submitted to the agencies on January 31, 1996.
- Draft Groundwater Removal Action EE/CAs at Parcel C and for Parcel E were submitted to the agencies in January, 1996.
- The draft FUDs work plan was submitted to the agencies for review in January 1996.

- The Sandblast Grit Recycling Summary Report/Technology Transfer document was provided as information to the agencies in January 1996.
- Draft Revised QAPjP was submitted to the agencies for review in January, 1996.

### 3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

- **Background Levels:** On October 2, 1995, the Navy received a letter from the Department stating that the ambient level concentrations submitted on August 17, 1995 were accepted with the exception of chromium, cobalt, and nickel. 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, 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 generally agreeing with the Department's position on ambient levels at HPA. The Navy is making minor revisions and is expected to submit the letter to the Department in early February.
- **Offsite Access for RI Work:** The Navy is continuing to attempt 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 and under adjacent private property. A discussion is underway between Navy's counsel and the property owner. The Parcel B RI Report provided the information that was available at the time of its preparation. If additional work is required, it will be reported in later documents. Resolution of this issue is pending.
- **Dry Dock 4 Removal Action:** The Removal Action EE/CA sampling for tunnel sediment characterization has been delayed due to unavailability of radiation health and safety sample screening. Contracting for screening personnel is ongoing.
- **PCB Occurrences:** EPA expressed some concern regarding the widespread occurrence of polychlorinated biphenyls (PCB) at low levels site wide. The Navy is reviewing a response that evaluates locations with PCB concentrations that exceed 1 mg/kg to determine an appropriate response action, and expects to submit it to the agencies in February.
- **Risk Assessment:** There is ongoing discussion between Navy and the agencies regarding the methodology that will be used for the calculation of the HHRA for the Parcel B RI report. The disagreement centers in the area size of the grid that will be used for calculation purposes. The resolution to this issue was to perform the HHRA for the draft Parcel B RI Report based on a 1/2-acre grid size, and submit a HHRA based on a 2,500 square foot (sf) grid size in the draft final Parcel B RI Report and compare the conclusions. The draft HHRA based on a 2,500 sf grid size is scheduled for submittal on February 29, 1996.
- **Ecological Risk Assessment:** A field variance request was submitted to the agencies via EFA West letter Ser 1832.3/6070 dated January 8, 1996 regarding the sampling locations of the Phase 1B ERA. One of the issues left unresolved was the sampling locations K2 and K3 which were impeded by a ship owned by one of the Navy tenants. The tenant did move their ship as scheduled and the Navy was able to take samples in the original locations.

#### 4. REPORTS AND ACTIVITIES FOR FEBRUARY 1996

##### Documents Scheduled for February 1996 Submittal

- Parcel A Storm Monitoring report
- Draft Final IR-6 Tank Farm EE/CA
- Draft Final Exploratory Excavation EE/CA
- Draft Groundwater Plume EE/CA for Parcel B
- Draft Phase III Radiation Investigation Work Plan
- Draft Parcel F Preliminary Assessment
- Draft Final Subsurface Radiation Investigation in Parcels B and E Report
- Response to the Department's letter of September 23, 1995 regarding HPALs
- Draft OU II Groundwater Monitoring Report

##### Activities Planned for February 1996

- **Field Investigations:** Continue with the implementation of the RI field work for all Parcels. Tasks include drilling, surveying, monitoring well installation, sump clean out and others. Continue with the implementation of the Phase 1B Ecological Assessment field work. The main task is tissue sampling.
- **Removal actions:** Continue removal action at the Pickling and Plate Yard (IR-09).
- **Meetings:** Prepare for a meeting with the agencies concerning groundwater removal actions at Parcels B, C, and E on February 7, 1996.
- RPM's prepare for a Conversion Management meeting with SFRA on Feb 15, 1996.
- Prepare for a meeting with the agencies concerning the IR-3 EE/CA on February 21, 1996.
- **Radiation Issues:** Preparation for the screening of NRDL sites. Continue the radiation-related waste management activities.
- **Technical Memoranda/Position Papers:** Navy preparing response regarding HPAL issues. Continue the preparation of Navy's response regarding locations at HPA with PCB concentrations greater than 1 mg/kg. Continue the preparation of the filtered/unfiltered/slow purge groundwater sampling report. Preliminary Draft due to Navy for review in February.
- **Air Monitoring:** Prepare response to comments on the Phase 2 Air Monitoring report.

- **RI Reports:** Continue the preparation of the Parcel C, D and E RI reports.
- **BCT Activities:** Prepare for the monthly BCT/RPM meeting scheduled February 6, 1996.
- **CRP Activities:** Prepare poster session for RAB meeting on February 22, 1996.

**5. KEY PERSONNEL CHANGES**

The U.S. EPA has assigned Anna-Marie Cook to the project team.

**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**

**RI Work (Excluding Site Assessment Sites)**

- RI Sampling 100%
- RI Lab Analysis/Data Validation 94%
- RI Data Management/Interpretation 93%

**RI Work at Site Assessment Sites**

- RI Sampling 100%
- RI Lab Analysis/Data Validation 70%
- RI Data Management/Interpretation 70%

**RI Work (Including Site Assessment Sites)**

- Draft RI Report 100%
- Draft Final RI Report 0%

**PARCEL C/DRY DOCK NO. 4**

**RI Work (Excluding Site Assessment Sites)**

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

**RI Work at Site Assessment Sites**

- RI Sampling 60%

**ACTIVITY/DELIVERABLE**

**PERCENTAGE COMPLETE**

- RI Lab Analysis/Data Validation 20%
- RI Data Management/Interpretation 5%

**RI Work (Including Site Assessment Sites)**

- Draft RI Report 10%
- Draft Final RI Report 5%

**PARCEL D**

**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 70%
- RI Lab Analysis/Data Validation 35%
- RI Data Management/Interpretation 20%

**RI Work (Including Site Assessment Sites)**

- Draft RI Report 10%
- Draft Final RI Report 0%

**PARCEL E**

**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 40%

**ACTIVITY/DELIVERABLE****PERCENTAGE COMPLETE**

- RI Lab Analysis/Data Validation 20%
- RI Data Management/Interpretation 10%

**RI Work (Including Site Assessment Sites)**

- Draft RI Report 5%
- Draft Final RI Report 0%

**TREATABILITY STUDIES/REMOVAL ACTIONS****OUI Sites**

- Draft IR-3 Treatability Study work plan for:
  - (1) Chemically and Thermally Enhanced Recovery 100%
  - (2) Bioremediation 100%
- Draft Final IR-3 Treatability Study Work Plan for:
  - (1) Chemically and Thermally Enhanced Recovery 100%
  - (2) Bioremediation 100%
- Draft Radium Removal Treatability Study for IR-2 0%
- Draft Final Radium Removal Treatability Study for IR-2 0%

**Removal Actions****Pickling & Plate Yard, IR-9**

- Implementation of Removal Action at Pickling and Plate Yard, IR-9 90%
- Draft Summary Report of Removal Actions at Pickling and Plate Yard, IR-9 10%
- 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%

**ACTIVITY/DELIVERABLE**

**PERCENTAGE COMPLETE**

- 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 100 %

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

**Dry Dock 4 IR-57**

- Implementation of Removal Action for drainage tunnels 0%

**EE/CA**

- Draft EE/CA for Storm Drain System 50%

- Draft Final EE/CA for Storm Drain System 0%

- Draft EE/CA for Floating Products in IR-3 10%

- Draft Final EE/CA for Floating Products in IR-3 0%

- Draft EE/CA for Groundwater Plumes in Parcels B, C, and E 70%

- Draft Final EE/CA for Groundwater Plumes in Parcels B, C, and E 0%

- Draft EE/CA for Exploratory Excavations 100%

- Draft Final EE/CA for Exploratory Excavations 0%

- Draft EE/CA for Dry Dock 4 75%

- Draft Final EE/CA for Dry Dock 4 0%

**Facility-wide Investigations**

- Draft Phase II Air Sampling Report 90%

- Ecological Risk Assessment Phase IB Implementation 30%

- Quarterly Groundwater Monitoring Implementation (OU II sites) 95%

**ACTIVITY/DELIVERABLE**

**PERCENTAGE COMPLETE**

- Draft Facility-wide Quarterly Groundwater Monitoring Work Plan Implementation 0%
- Site-wide Radiological Assessment 35%

*Richard E. Powell*

RICHARD POWELL  
LEAD REMEDIAL PROJECT MANAGER

*2-15-96*

DATE