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Ser 1832.1/L6183
25 Apr 1996

Ms. Anna-Marie Cook
U.S. Environmental Protection Agency
Region IX, H-9-2
75 Hawthorne Street
San Francisco, CA 94105

Subj: PROPOSED REVISIONS TO THE FEDERAL FACILITY AGREEMENT PARCEL B
SCHEDULE, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Dear Ms. Cook:

1. The purpose of this letter is to propose a modification to the existing Hunters Point Shipyard (HPS) Federal Facility Agreement (FFA) schedule for the delivery of the draft final Parcel B Remedial Investigation (RI) Report, and the draft Parcel B Feasibility Study (FS). These proposals have been previously discussed with you.

2. The two proposed modifications to the FFA schedule are as follows:

(a) To extend the 45 day period for the response to comments on the draft Parcel B RI and submittal of the draft final Parcel B RI report by 30 days. This extension, which is in accordance with section 7.7 (f) of the FFA, is needed to respond appropriately to the comments received during the draft RI public review process. Of special significance were the comments on the Human Health Risk Assessment. In addition, review comments from the RAB were received after the close of the comment period. This extension will move the scheduled submittal from May 1, 1996, to June 3, 1996.

(b) Because the draft final RI and draft FS have been scheduled for submittal on the same day, the Navy proposes to extend the submittal date of the draft Parcel B FS report by 30 days. The basis for the extension of the document submittal is the need for a strong integration between the recommendations found in the RI report, along with the desired concurrence of all the BRAC closure team members on those sites to be evaluated in the FS report. As a result of ongoing discussions between the Navy and the regulatory agencies concerning issues in the draft RI report, the concurrence regarding those sites to be advanced to the FS stage was not reached until April 2, 1996. To maximize the value of this 30-day period, workshop-type meetings, focused on preparation of the draft FS, can be held as the BCT desires. An extension, in compliance with Section 9.2(g) will ensure the submittal of a FS report with no unresolved issues of regulatory concern. To maintain the schedule for the submittal of the draft final FS report and all subsequent submittals, the Navy proposes to shorten the original scheduled regulatory agency review from 45 to 30 days and reduce Navy response time from 45 to 30 days. These reductions will allow the Navy to meet the Record of Decision (ROD) schedule for Parcel B with a final ROD date of February 14, 1997.

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3. The Navy has also taken the following steps to address the issue of schedule maintenance:

(a) An additional Navy Remedial Project Manager (RPM), Ms. Luann Tetirick has been added to the HPS team. She will assume some of the collateral duties of the Navy's Parcel B RPM allowing him to focus on Parcel B issues.

(b) The Parcel C, D, and E project teams are working closely with the Parcel B team to share in lessons learned by the Parcel B team.

4. The above proposed changes to the schedule are necessary to meet the highly accelerated and ambitious schedule that the BCT members have agreed to in order to speed up the transfer of HPS to the City of San Francisco. To meet such schedules requires a flexible approach which incorporates the technical needs of the project while maintaining the best quality possible. It is felt that this approach satisfies those goals.

5. By copy of this letter, concurrence from the Department of Toxic Substances Control and the Regional Water Quality Control Board is also requested. If you have any questions regarding this matter, please contact me at (415) 244-2655.

Sincerely,

Original signed by:

RICHARD E. POWELL
Remedial Project Manager for HPS/TI
By direction of
the Commanding Officer

Copies to:

California Department of Toxic Substances Control (Attn: Mr. Cyrus Shabahari)
California Regional Water Quality Control Board (Attn: Mr. Richard Hiatt)
PRC Environmental (Attn: Mr. Jim Sickles)
Harding Lawson Associates (Attn: Mr. David Leland)

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Admin. Records (3 copies)
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