

5090
Ser 1832.2/L6315
24 Jul 1996

Ms. Anna-Marie Cook
Remedial Project Manager
Federal Facilities Cleanup Program
U. S. Environmental Protection Agency
Region IX, H-9-2
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Cook:

The purpose of this letter is to propose a modification to the existing Hunters Point Shipyard (HPS) Federal Facilities Agreement (FFA) schedule for the delivery of the Draft Ecological Risk Assessment Phase 1B Report. This proposal has been previously discussed with you.

The proposed modification to the FFA schedule, which is in accordance with section 9 of the FFA, would extend the submittal date for the Draft Ecological Risk Assessment Phase 1B Report from August 01, 1996, to September 30, 1996. The extension of the document submittal date is based on the following two major impacts that have been encountered during the implementation of the work;

1. The first of these major impacts was the need to extend the sample collection period for tissue samples for bioassay for the following reasons:

a. An additional 6 weeks of sampling was required to collect sufficient tissue for the bioassay analyses due to a lack of adequate organisms in the proposed sampling areas. The BRAC Clean-up Team agreed to these sampling locations ahead of time; and to maintain this approach and to follow this strategy, the Navy did take the extra time and did commit funds to respond to these unforeseeable field conditions.

b. The additional sampling required the development of additional sample delivery groups (SDGs) beyond those initially planned for, and this required more validation reports and time for review.

c. Sediments could only be collected from 5 sampling locations per day to avoid overwhelming the laboratory that was conducting the pore water extraction process. This could not have been anticipated because the application of this process was developed during the formulation of the work plan and the QAPjP for this part of the project.

2. The second impact is the result of the larger than anticipated amount of data that will need to be analyzed, and the incorporation of this new Phase 1B work with all of the results of earlier studies for the following reasons:

a. As the data was compiled, it became apparent that earlier data, from the ESAP and from the Intertidal Zone under the IR program, should be included in the data analysis and interpretation to obtain the most comprehensive picture. This created the need for planning for additional data analysis.

b. As a result of the increase in data points from both (1) the additional sampling to get tissue, and (2) the additional data from the ESAP and the IR intertidal samples, these increased number of data points required additional time to conduct the different data evaluation techniques and database operations.

c. A result of the increased number of chemicals and data points is a need to adequately display and analyse this data, and this required the creation of 300 contaminant distribution maps, which required additional time. The Navy's Ecological Risk Assessment team have estimated that more than 58,000 records in the database (which is a substantial increase in records from the original estimate), will need to be sorted and loaded into a small GIS system, and then manipulated to create distribution maps for the report.

All of the above data manipulation will require an extension for submittal of the document. To help explain this situation, the Navy can prepare a general description of the contents of the report such as table of contents, list of maps and tables, and the general approach for the use of this data. For your information, the approach will consist of:

1. Sorting through all of the data from the sediment chemistry and the pore water chemistry, and screening this data against the available screening criteria (such as NAWQCs and sediment criteria). The results from this screening process would be loaded into a GIS system to allow plotting of the data by its geographic location. This data would then be evaluated statistically within the GIS by running multivariate regression analysis, and then calculating correlation coefficients to see if there is a clustering of specific metals, or contaminants that cause toxicity effects.

2. All of this data will then be plotted out on maps to see if there are specific areas, or possible gradients (such as an outfall) which will be reported in the interpretation. The end result of this process will be an estimate of what contaminants (and concentrations) are contributing to the sediment toxicity. The Navy believes that the available data and software will address the contribution of the PAHs, but this cannot be confirmed until the data is analyzed. The end result of this process will be a picture of the sediment contamination, its toxicity, and which chemicals contribute to the risk. The Navy will not be able to provide information about the risk levels from contaminants in the groundwater that are potentially migrating into the bay. There are several available approaches to the potential migration of groundwater into the bay, and the Navy would like to discuss these issues with the agencies.

The proposed change to the FFA schedule is necessary to meet the highly accelerated and ambitious schedule that the BRAC Clean-up Team members have agreed to in order to speed up the transfer of HPS to the City of San Francisco. During evaluation of this proposed

5090
Ser 1832.2/L6315
24 Jul 1996

modification, please consider the constant interaction that occurred during the sampling activities, which involved the movement of sample locations, and the additional sampling or substitution that occurred when events in the field did not allow for the originally scoped analysis. The Ecological Risk Assessment project working schedule, that had been sent out previously with all of the parcel schedules, had incorporated a delay to take into account the extra sampling time (a total of 6 plus weeks), and resulted in a delivery date of September 10th. This change was shown on the Ecological Risk Assessment project working schedule without changing the FFA schedule.

Several impacts could result from the proposed modification to the FFA schedule:

1. At this time, it appears that the "estimated date" for the Draft Ecological Risk Assessment Phase 2 Workplan will have to be changed from February 02, 1997 to April 02, 1997.
2. The FFA schedule for the Parcel E RI report shows the Draft RI report to be submitted on April 29, 1997, with the draft final RI and the draft FS reports due on July 28, 1997. The draft ROD for Parcel E is due on January 14, 1998, with a final ROD on May 14, 1998. This implies that it would be possible to get the results of the Phase 1B ecological risk assessment into the Draft Parcel E RI report; but if it is required to perform a Phase 2 Ecological Risk Assessment or a Parcel F Feasibility Study, the results of these projects would not be in the Parcel E RI or FS reports. If a nine to twelve month turnaround is assumed for a Phase 2 Ecological Risk Assessment, or for an FS for Parcel F, these reports would not be ready until October 1997 or January 1998 (depending on the use of 9 or 12 months). These schedule impacts could be addressed in several ways, and the Navy would like to discuss these issues with the agencies.

To meet such schedules requires a flexible approach, which incorporates the technical needs of the project while maintaining the best possible quality. It is felt that the proposed approach satisfies these goals. By copy of this letter, concurrence is also requested from the Department of Toxic Substances Control and the Regional Water Quality Control Board. If you have any questions regarding this letter, please contact either myself at (415) 244-2655, or Mr. William Radzevich at (415) 244-2555.

Sincerely yours,

Original signed by:

RICHARD E. POWELL
Lead Remedial Program Manager for HPS/TI
By direction of
the Commander

5090
Ser 1832.2/L6315
24 Jul 1996

Copies to:

Cal-EPA, Department of Toxic Substances Control (Attn: Mr. Cyrus Shabahari)
Regional Water Quality Control Board (Attn: Mr. Richard C. Hiatt)
PRC Environmental Management (Attn: Mr. James Sickles)

Blind copies to:

62.3, 62C, 1832, 1832.2, 09CMN
Information Repository (3 Copies)
Chron, Green
Activity File: HPS (aka HPA) (File: L6315WR.DOC) ab