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

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

Encl: (1) August 1996 Monthly Progress Report (MPR)

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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RAB Member: ROSE (Attn: Mr. Charles L. Dacus, Sr.)
RAB Member: Mr. Alonzo L. Douglas
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RAB Member: Labor Neighbor (Attn: Ms. Laurie Espinoza)
RAB Member: Mr. Manual J. Ford
RAB Member: Innes Avenue Coalition (Attn Ms. Jill Fox)
RAB Member: Hillside Homeowners (Attn: Ms. Bonnie Fraenza)
RAB Member: ROSES (Attn: Mr. Greg Freeman)
RAB Member: Lawyers Com. Civil Rights (Attn: Mr. Michael Harris)
RAB Member: Forest Hill Association (Attn: Mr. James A. Heagy)
RAB Member: Mr. David E. Jackson
RAB Member: All Hallows Tenants Association (Attn: Ms. Helen Jackson)
RAB Member: Third Street Task Force (Attn: Ms. Henrietta Jones)
RAB Member: Kern Mediation Group (Attn: Mr. Douglas Kern)
RAB Member: Mr. Anthony LaMell
RAB Member: Shipyard Tenants Association (Attn: Mr. Scott Madison)
RAB Member: UJAMAA (Attn: Ms. Mamie Matthews)
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RAB Member: Ms. Dorothy Peterson
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RAB Member: ARC Ecology (Attn: Ms. Christine Shirley)
RAB Member: Young Community Developers (Attn: Ms. Carol S. Tatum)
RAB Member: Mayor's Hunters Point Shipyard Citizens Advisory Committee
(Attn: Mr. Leon Thibeaux)
RAB Member: All Hallows Young Ladies #182 (Attn: Ms. Erlinda B. Villa)
RAB Member: African American Truckers (Attn: Mr. Charlie Walker)
RAB Member: Senior Citizen Bayview (Attn: Mrs. Osceola Washington)
RAB Member: Ms. Caroline Washington
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RAB Member: Black Leadership Forum (Attn: Ms. Gwendolyn Westbrook)
RAB Member: Mr. Nathaniel White III
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RAB Member: Mayor's Hunters Point Shipyard Citizens Advisory Committee
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**INSTALLATION RESTORATION PROGRAM
MONTHLY PROGRESS REPORT**

AUGUST 1996

**NAVAL FACILITIES ENGINEERING COMMAND
HUNTERS POINT SHIPYARD**

1. PROGRESS DURING THE REPORT PERIOD

The activities described below were completed during the current report period. Those activities described as complete in the previous monthly progress report have been omitted for brevity.

The facility status is as follows:

- **Field Work:** Remedial investigation fieldwork has been completed for Parcels B, C, and D. Field activities conducted for Parcel E are described below.

All borings and monitoring wells for the three formerly used defense sites (FUDS) were completed in August. The third round of groundwater samples is expected to be collected on schedule at the new monitoring wells in November 1996. The soil gas survey at SI-74 initially scheduled to be conducted in August was postponed until September. Aquifer testing will be performed on the new monitoring wells during September. Analysis of soil samples collected in IR-02 and IR-15 indicated dioxins and furans at low levels at the surface. Several additional soil samples will be collected at three locations to help define the extent of contamination.

Routine waste management tasks were performed during August, including collecting, sampling, and accumulating investigation-derived waste (IDW) in tanks and bins, and inspecting bin locations and the decontamination pad.

Limited outdoor air sampling to address remaining data gaps in Parcel E will be conducted from September 18 to 27, 1996.

- **Parcel A:** The Draft Parcel A FOST was submitted to the agencies for review on June 24. Comments were received on July 24 and 25, 1996, from U.S. EPA, DTSC, and the City and County of San Francisco. Responses will be submitted in the Draft Final Parcel A FOST, currently scheduled for submittal in September 1996, pending completion of the legal description of the parcel. The Navy conducted a survey required to prepare the legal description.

DTSC is currently addressing the issue of the notification requirement for the storage of hazardous substances in some buildings at Parcel A, specifically those used by artisan tenants.

- **RI Reports:** The Final Parcel B RI Report, consisting of responses to comments, was submitted on August 8, 1996. The Draft Parcel D RI Report was submitted on June 28,

1996; agency comments were received on August 13, 1996. Progress is ongoing in the preparation of the Parcel C and E RI reports.

- **FS Reports:** The Navy continued to prepare responses to comments for inclusion in the Draft Final Parcel B FS Report, scheduled for submittal on September 3, 1996. Responses to comments will be submitted to the agencies concurrent with the incorporation of the responses into the draft final report. Progress is ongoing in the preparation of the Parcel C and D FS report.
- **Proposed Plan Reports:** The Navy continued to prepare the Draft Parcel B Proposed Plan, scheduled for submitted on September 3, 1996.
- **Removal Actions:**

Pickling and Plate Yard (IR-9): This removal action was completed by the Navy Public Works Center San Francisco Bay (Public Works). The Navy completed the Draft Construction Summary Report for submittal on August 2, 1996.

Exploratory Excavations: Exploratory excavation removal activities were initiated on August 8. During the month of August, approximately one third of the sites were excavated to the initial depth and extent of the proposed excavations. Daily field reports are being prepared by the contractor and submitted to the Navy for review. the final EE/CA and Final Action Memorandum is expected to be completed in late September.

IR-1/21 Industrial Landfill Groundwater Plume: The Draft IR-1/21 Action Memorandum was submitted on July 19, 1996, and agency comments received on August 29, 1996. The final action memorandum will be revised to reflect agency comments and is expected to be completed in September. The Navy expects to start work on this removal in early fall of 1996.

IR-3 Waste Oil Ponds: The Navy initiated preparation of the Final IR-3 EE/CA to incorporate comments received from the agencies on August 20. The Draft IR-3 Action Memorandum was submitted to the regulatory agencies on July 19, 1996. The Navy completed the implementation work plan (IWP) and will forward the document to the agencies in September. A public notice for the IR-3 removal action was published in the July 16 issue of *The Independent* announcing the 30-day public comment period for the Draft Final EE/CA for IR-3. The public comment period ended on August 15, 1996.

Storm Drains: The Final Storm Drain EE/CA was submitted for agency review on July 26, 1996. The Draft Storm Drain Action Memorandum was submitted on July 19 and agency comments were received on August 29, 1996. The final action memorandum will be revised to reflect agency comments and is expected to be completed in early September.

Tank Farm (IR-6): This work is being performed by Public Works. The public comment period on the EE/CA for this removal action began on June 26, 1996.

Dry Dock 4: The preparation of documentation is being performed by Supervisor of Shipbuilding, Conversion and Repair, Portsmouth, Virginia, Environmental Detachment, Vallejo (SSPORTS). Additional sampling was conducted in February to perform the

modified waste extraction test (WET) for bay water exposure. Preliminary results indicate low to non-detected concentrations of most metals. The Navy submitted the revised Draft Dry Dock 4 EE/CA on August 8, 1996.

- **Ecological Risk Assessment Phase 1B:** The screening of the analytical data collected against sediment and water quality criteria was initiated in July 1996, and sediment distribution maps are being prepared. Field sampling and analysis for the sediment, pore water, and tissues has been completed. Analytical, bioassay, and tissue data has been validated and the qualifiers have been added to the chemical data base. Currently, toxicity reference values (TRV) are being discussed between the Navy and agencies at other Naval facilities; the resultant TRVs will be applied at HPS. Delays in the process of reaching consensus on accepted TRVs may impact results of the Phase 1B study. The Draft Phase 1B Ecological Risk Assessment Report, Volume II (Chemistry and Toxicity Test Results), is scheduled for submittal on September 16, 1996. Volume I (Text) is scheduled for submittal on September 30, 1996.
- **Radiation Issues:** Submittal of the Draft Final Phase III Radiation Investigation Field Work Plan was delayed following regulatory agency requests for complete historical documentation to be included. The Navy Radiological Affairs Support Office (RASO) and the regulatory agencies met on July 11 to discuss the documentation process. The Navy is currently preparing responses to agency comments.

The Navy submitted to the agencies a technical memorandum that addresses the tidal area surrounding IR-2 on June 28, 1996; written comments have not been received from U.S. EPA; however, comments from DTSC and DHS were received and the Navy is currently preparing responses.

The Navy prepared an abbreviated feasibility study to evaluate the remedial alternatives, costs, public perception, and other factors associated with the removal of radium dials in the landfill. Verbal comments were received from the regulatory agencies on June 17; however, the BCT will decide on what follow up is required following receipt of written comments.

Radiation-related field activities conducted during August included weekly inspections and maintenance of drums and bins containing potentially radioactive investigative derived waste (IDW). The remaining drums and bins not previously disposed off-site are scheduled for radiation screening in early September 1996. Following the IDW screening and authorization for release, the IDW will be tested for chemical hazards before being moved off-site for disposal.

A water sample was collected from the subsurface secondary containment vault outside of Building 364 to confirm that no gamma-emitting radionuclides were above discharge criteria as a part of the Parcel D RI field investigation. Analytical results will be available by September 9, 1996.

- **Hunters Point Shipyard Groundwater Ambient Levels (HGAL):** The Navy has developed HGALs for naturally occurring metals that have a maximum contaminant level (MCL), U.S. EPA Region 9 tap water preliminary remediation goal (PRG), or National Ambient Water Quality Criteria (NAWQC). The Navy completed the preliminary statistical

analysis for submittal to the regulatory agencies on June 21, 1996. The Navy issued draft HGALs to the regulatory agencies on July 1, 1996. The Navy has documented the calculations of the HGALs in a technical memorandum which is currently undergoing review and will be submitted in September.

- **Community Relations:** The Draft Final Revised Community Relations Plan (CRP) was submitted to the regulatory agencies on June 11, 1996; comments were received from DTSC on July 3, 1996 and the proposed response is under evaluation.

2. REPORTS SUBMITTED AND MEETINGS

Meetings

- The BCT/remedial project manager (RPM) meeting was conducted on August 7, 1996.
- A RAB meeting was held on August 28, 1996. During this meeting, the Navy provided a introduction for the new members of the RAB. The presentation consisted of explaining how the RAB functions as part of the cleanup process ongoing at HPS. Over 30 of the new RAB membership were able to attend the presentation and question and answer period. At the next RAB in September the new members will be taken on an on-site tour of HPS to familiarize them with the ongoing cleanup activities at the site.
- A Pre-Construction meeting was held by the Resident Officer in Charge of Construction, San Francisco Bay, on August 5, 1996 for the Industrial Landfill Water Plume Removal Action and August 29, 1996, for the Storm Drain Removal Action.

Submittals

- Draft Pickling and Plate Yard Construction Summary Report
- Revised Draft Final IR-6 EE/CA
- Draft IR-6 Removal Action Memorandum
- Technical Memorandum - HGAL Calculations
- Draft Dry Dock 4 EE/CA.

3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

- **Offsite Access for RI Work:** The Navy completed four groundwater monitoring wells off-facility, adjacent to the western boundary of IR-01 in Parcel E. Two of the wells were installed on City of San Francisco property as planned. The other two wells were inadvertently located on State property. The California Department of Parks and Recreation, which manages the property, has not indicated what action is needed to resolve the issue. If well abandonment is required, the Navy hopes that groundwater level measurements can be conducted prior to destroying the wells.

- **Parcel A FOST:** The Navy will perform a property boundary survey of Parcel A to provide a legal description for the FOST.
- **Petroleum-only Sites at HPS:** The Navy has started the identification of installation restoration sites within Parcels B through E that contain (1) petroleum-only constituents (non-CERCLA hazardous substances) in soils; (2) petroleum constituents with CERCLA substances in soils below screening levels; (3) CERCLA substances in soils above screening levels; and (4) sites that require no further action. The purpose is to segregate petroleum-only issues from CERCLA issues for administrative purposes, and inclusion of these sites in a petroleum corrective action plan.
- **Scope of the Basewide RI Report:** The current FFA lists a deliverable for a Basewide RI Report to accompany the delivery of the Parcel E RI Report. The scope of the Basewide RI is not currently defined. Current discussions concerning the Basewide RI are focusing on a Basewide ROD to address ecological issues. The preparation of the draft Parcel E RI Report before the final reports from the ecological risk assessment may result in a data gap which could support the preparation of a Basewide RI/FS/ROD. The scope of a Basewide RI report and potential Basewide ROD are under discussion between the Navy and the BCT. The Navy submitted a proposed scope of work for the Basewide RI to the agencies on June 14, 1996. The Navy and BCT are still evaluating the need and or scope for a Basewide ROD.
- **Groundwater Investigation:** The Navy will prepare the Draft Final Study of Groundwater Sampling Methods for Metals Technical Memorandum following receipt of agency comments if necessary.
- **Ecological Risk Assessment:** The current approach for the Phase 1B ecological risk assessment is to use those toxicity reference values (TRV) for avian receptors which have been agreed to by the regulatory agencies for use at other San Francisco Bay Navy installations. The goal of the approach is to provide assessments that use agreed-upon TRVs to establish a uniform Bay Area-wide approach. Since the values necessary for the HPS assessment have not yet been determined during ongoing discussions with the other installations, the Phase 1B ecological risk assessment could be impacted. Inclusion of TRVs into the HPS assessment that have not been agreed-upon at the other installations could result in a duplication of work once the agreed-upon TRVs have been issued if significant differences are found requiring reanalysis. Solutions to this issue include: (1) submit the Phase 1B report on schedule without the risk assessment section and TRVs, which would be submitted at a later date; or (2) submit the entire report following issuance of the agreed-upon TRVs. This issue is under discussion by the BCT, and a Bay Area Biological Technical Advisory Group meeting to discuss the last group of TRVs necessary for the HPS assessment is scheduled for early October. The Navy is proposing to submit Volume II on September 16, 1996 and Volume I (without the risk assessment) on September 30, 1996, and the risk assessment section of the report on November 15, 1996.

4. REPORTS AND ACTIVITIES FOR SEPTEMBER 1996

Documents Scheduled for September 1996 Submittal

- Draft Final Parcel A FOST
- Draft Final Parcel B FS
- Draft Parcel B Proposed Plan
- Draft Final Parcel B Proposed Plan
- Final Parcel B Proposed Plan
- Draft Parcel D FS
- Draft Final Parcel D RI (delayed until October 1996)
- Draft Phase IB Ecological Risk Assessment
- Final Storm Drain Action Memorandum
- Final IR-1/21 Action Memorandum
- Final IR-3 Action Memorandum
- IR-3 Implementation Work Plan
- Draft Final Phase III Radiation Investigation Work Plan

Activities Planned for September 1996

- **Field Investigations:** Continue with the implementation of groundwater sampling at Parcel E, including conducting the soil gas survey at SI-74, outdoor air sampling, and surface soil sampling.
- **Removal actions:** Continue work at Dry Dock 4 and IR-6. Continue the removals at the exploratory excavations initiated in August 1996. Continue with the preparation of the documentation for upcoming removal actions. Anticipate starting the Storm Drain Removal project and the Industrial Landfill Groundwater Plume Removal project the latter part of September.
- **Parcel A Legal Description:** Complete the documentation of the Parcel A survey boundary to provide a legal description for the FOST.
- **Meetings:** Attend the BCT/RPM meeting scheduled for September 17, 1996. Attend the RAB meeting scheduled for September 25, 1996.

- **Radiation Issues:** Prepare for the screening of NRDL sites to be conducted in September 1996. Continue the radiation-related waste management activities. Continue the preparation of the Draft Final Phase III Radiation Investigation Field Work Plan.
- **RI/FS Reports:** Continue the preparation of the Parcels C, D and E RI reports. Prepare for a potential meeting regarding the regulatory agency comments on the Draft Parcel D FS report.
- **Proposed Plan Reports:** Continue the preparation of the Parcel B proposed plan reports for submittal on September 3, and prepare for a possible meeting with the agencies regarding any comments.
- **BCT Activities:** Prepare for the monthly BCT/RPM meeting.
- **CRP Activities:** Provide ongoing support for the RAB and any other community relations activities requested by the Navy.

5. KEY PERSONNEL CHANGES

David Leland project manager for Harding Lawson Associates has left the project and will be replaced by Carl Michelsen who was their technical lead previously.

6. DELIVERABLES STATUS

This listing consists of installation deliverables organized by parcel, multiparcel (or facility wide), and removal actions, and their status. Please note that as deliverables are completed, they will no longer be included in subsequent progress reports.

Parcel A Reports

- Draft Final Parcel A Finding of Suitability to Transfer
Status: Scheduled for submittal to the agencies following completion of legal description of Parcel A.

Parcel B Reports

- Final Parcel B Remedial Investigation Report
Status: Response to agency comments on the report was submitted on August 8, 1996. The response to agency comments constitutes the final report submittal.
- Draft Final Parcel B Feasibility Study Report
Status: Scheduled submittal to the agencies on September 3, 1996.
 Agency review period is 30 days.

Parcel C Reports

- Draft Parcel C RI Report
Status: Scheduled submittal to agencies on November 30, 1996. Agency review period is 45 days. Currently undergoing data base quality control, data interpretation, and report preparation.
- Draft Parcel C Feasibility Study Report
Status: Scheduled submittal to the agencies on February 27, 1997. Agency review period is 45 days.

Parcel D Reports

- Draft Final Parcel D RI Report
Status: Scheduled for submittal to the agencies on September 26, 1996. Agency review period is 30 days.
- Draft Parcel D Feasibility Study Report
Status: Scheduled submittal to the agencies on September 26, 1996. Agency review period is 45 days.

Parcel E Reports

- Draft Radiation Investigation of the Tidal Area Surrounding the Bay Area Landfill (IR-02) Technical Memorandum
Status: The report was submitted to the agencies on June 20, 1996. The Navy is currently awaiting agency comments from U.S. EPA, and is preparing responses to comments to those received from DTSC and DHS.
- Draft Parcel E RI Report
Status: Scheduled submittal to agencies on April 29, 1997. Agency review period is 45 days. Currently performing quality control of the Parcel E database.

Parcel F Reports

- Draft Phase 1B Ecological Risk Assessment Report
Status: Scheduled submittal to agencies on September 30, 1996. Currently undergoing data interpretation. The Navy will propose a revised submittal schedule (see item 3, Ecological Risk Assessment).

Multiparcel/Facility-Wide Investigation Reports

- Draft Final Results of Subsurface Radiation Investigation on Parcels B and E
Status: The report was submitted to the agencies in mid July.
- Draft Final Phase III Radiation Investigation Field Work Plan
Status: Submittal due to the Navy was April 26, 1996; however, due to agency requests for complete historical documentation, the delivery has

been delayed pending guidance from RASO and a discussion with the regulatory agencies on July 11, 1996. The Navy is preparing responses to the agency comments, and expects to submit the responses in October.

- Draft Annual OU II Groundwater Monitoring Report
Status: Submitted to the agencies in June 1996.
- Draft Final Revised Community Relations Plan
Status: Delivered to the agencies on June 11, 1996. Comments were received from DTSC and the proposed responses are being evaluated by the Navy.
- Final Basewide Environmental Baseline Survey
Status: Submitted to the agencies on June 3, 1996; no comments are expected from the agencies.
- Draft Study of Groundwater Sampling Methods for Metals Technical Memorandum
Status: Distributed to the agencies in May and currently awaiting comments.
- Draft Review of PCB Occurrences in Soil and Groundwater Technical Memorandum
Status: Submitted to the agencies on June 26, 1996.

Removal Actions

- Final IR-1/21 Groundwater Removal EE/CA
Status: Submitted to the agencies on July 26, 1996, with the Draft IR-1/21 Action Memorandum.
- Draft Final IR-3 Floating Product Removal EE/CA
Status: Submitted to the agencies on July 19, 1996, with the Draft IR-3 Action Memorandum.
- Final Storm Drain Sediment Removal EE/CA
Status: Submitted to the agencies on July 26, 1996, with the Draft Storm Drain Action Memorandum.
- Draft Construction Summary Report of Pickling and Plate Yard Removal Action
Status: Submitted to the agencies on August 2, 1996. The agency review period is 30 days.

- Revised Draft Dry Dock 4 Removal EE/CA
Status: Submitted to the agencies on August 8, 1996.

Richard E. Powell

RICHARD POWELL
LEAD REMEDIAL PROJECT MANAGER

9-17-96

DATE