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HUNTERS POINT
SSIC NO. 5090.3

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Ser 1832.2/L6378
19 Sep 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:

In accordance with Section 9 of the Federal Facility Agreement (FFA), the Navy hereby proposes a modification to the existing Hunters Point Shipyard FFA schedule for delivery of the Draft Ecological Risk Assessment Phase 1B Report. The proposed modification is an extension of the submittal date for the Draft Ecological Risk Assessment Phase 1B Report from September 30, 1996, to November 15, 1996.

The Navy is proposing this schedule modification to allow sufficient time for development of toxicity reference values (TRVs) for aquatic and avian receptors for consideration in the ecological risk characterization section of the Draft Risk Assessment Report. The issue of TRVs for the HPS report was discussed at a September 11, 1996, meeting that was attended by representatives from the Navy, the Department of Toxic Substances Control, the Regional Water Quality Control Board, and the City and County of San Francisco. During this meeting, members of the San Francisco Bay Area Navy/Regulatory Agency Biological Technical Assistance Group (BTAG) indicated that Bay Area TRVs are anticipated to be finalized at an October 3, 1996, BTAG meeting. TRVs that have been approved by the Navy and the regulatory agencies are necessary for inclusion into the Ecological Risk Assessment Phase 1B Report because these values represent the critical exposure levels to a receptor from a chemical of potential concern (COPC) occurring at the site. These TRVs are critical parameters used to support the site specific exposure calculations for the Willet (a shorebird) and the Peregrine Falcon at HPS. These TRVs will be derived for up to thirty COPCs identified at HPS. These TRVs will then be used to calculate hazard quotients and indices for the receptors, based on the calculated dose values contributed by the site's contamination in conjunction with the agreed upon TRVs for each COPC for each receptor. All of this will be the basis for the ecological risk estimation and characterization section of the report.

The proposed schedule change would consist of the delivery of the data presentation (Volume II) on 16 September 1996, and the submittal of the remainder of the report (Volume I), excluding the ecological risk characterization section, on 30 September 1996. The final portion of the report, the risk characterization, would be submitted 46 days later on November 15, 1996. The proposed schedule revision and anticipated impacts are summarized as follows:

5090
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1. September 16, 1996 - Submittal of Draft Ecological Risk Assessment Phase 1B Report Volume II (Chemistry and Toxicity Test Results)
2. September 30, 1996 - Submittal of Draft Ecological Risk Assessment Phase 1B Report Volume I (Data Presentation without Risk Characterization)
3. November 15, 1996 - Submittal of Draft Ecological Risk Assessment Phase 1B Report (Comprehensive Risk Characterization section of report)
4. At this time, it appears that the "estimated date" for the Draft Ecological Risk Assessment Phase 2 Workplan will have to be changed from April 02, 1997, to May 02, 1997.
5. 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.

If you have any questions regarding this request for an extension , 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

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, ~~w/e-ene~~)

5090
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