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

To: Distribution

Subj: MONTHLY PROGRESS REPORT FOR JANUARY 1997, ENGINEERING FIELD ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Encl: (1) January 1997 Monthly Progress Report (MPR)

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RICHARD E. POWELL  
By direction of  
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ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS  
POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

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**INSTALLATION RESTORATION PROGRAM  
MONTHLY PROGRESS REPORT**

**JANUARY 1997**

**NAVAL FACILITIES ENGINEERING COMMAND  
HUNTERS POINT SHIPYARD**

**1. PROGRESS DURING THE REPORT PERIOD**

The Hunters Point Shipyard (HPS) Installation Restoration Program (IRP) 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.

**Field Work**

Remedial Investigation (RI) field work, with the exception of the Phase III Radiation Investigation, has been completed for Parcels B, C, D, and E. The Phase III Radiation Investigation will survey those buildings used by the Naval Radiological Defense Laboratory for radiation research which are missing documentation from the Nuclear Regulatory Commission's previous screening and release activities at HPS. The Phase III field screening began in mid- January and was expected to take approximately 6 weeks to complete. As a result of adverse weather conditions, the field work may take an additional 2 to 3 weeks to complete.

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

**Remedial Investigation (RI) Documents**

**Parcel A:** As stated in the December Monthly Progress Report (MPR), the draft final Parcel A finding of suitability to transfer (FOST) was scheduled for submittal in January 1997; however because additional questions were received from the City and County of San Francisco regarding lead-based paint concerns in Parcel A, the submittal date is still to be determined.

**Remedial Investigation (RI) Reports:** Response to comments on the draft Parcel D RI report from the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board were prepared. Response to comments on the draft final Parcel D RI from the Environmental Protection Agency (EPA) were also prepared. These responses to comments will be addressed as a separate attachment, and are expected to be submitted in February.

The draft Parcel C RI report was submitted on November 29, 1996, and comments from the regulatory agencies were received on January 27, 1997. Responses are in preparation and will be provided along with the draft final report which is due in 45 days after the receipt of the comments. Progress is ongoing in the preparation of the draft Parcel E RI report.

**Feasibility Study (FS) Reports:** The draft Parcel D FS was submitted to the regulatory agencies on September 26, 1996, and the Navy received comments from the regulatory agencies on November 12 and

November 14, 1996. Responses to these comments were submitted to the agencies along with the draft final Parcel D FS on January 24, 1997. The preparation of the draft Parcel C FS report is ongoing, and will be submitted in February 1997.

**Proposed Plan (PP):** The Navy submitted the preliminary draft Parcel D proposed plan (PP) on January 15, 1997.

**Record of Decision (ROD):** The Navy submitted the draft ROD for Parcel B to the regulatory agencies on October 17, 1996, and received comments on November 26, 1996. The revised Parcel B ROD incorporating previous comments was submitted on January 24, 1997.

### **Removal Actions**

**Exploratory Excavations:** Exploratory excavation removal activities continued through December. Excavations have been backfilled with clean fill and are in the process of being paved. This removal action is expected to be completed in March 1997.

**IR-1/21 Industrial Landfill Groundwater Plume:** The test section of sheet piling was installed between January 24 and January 28. Five sheet piles were installed and removed to test subsurface conditions. The results of the testing will be used to finalize the design of the sheet piling portion of the removal action.

**IR-3 Waste Oil Ponds:** To evaluate conditions at the IR-3 site, cone penetrometer testing and hydropunch groundwater sampling was begun and completed in January 1997. In addition, a test section of sheet piling was installed January 29. Five sheet piles were installed and removed to test subsurface conditions. The results from this testing will be evaluated and used to finalize the sheet piling alignment.

**Storm Drains:** Work continued through the current report period. Removal of sediments from the storm drain lines commenced on October 17, 1996, and will continue for approximately 5 months depending on field conditions.

**Tank Farm (IR-6):** Removal action work in the tank farm consists of excavating metals and polychlorinated biphenyl (PCB) contaminated soil from the tank farm for off-site disposal. To ensure that the cleanup levels under the removal action is consistent with the Parcel B FS cleanup levels, the proposed excavation plan has been reviewed and modified as appropriate. The contracting for the excavation required modification to allow the use of the RAC contractor since the Public Works Center is closing in April 1997 and will be unable to complete the work. Currently, the excavation is proposed to be conducted concurrently with the exploratory excavation removal action and is expected to take place in March and April 1997. A treatability study addressing bioremediation is being conducted concurrently with the soil removal and was expected to be completed in January 1997 but is now expected to be submitted in March 1997.

### **Ecological Risk Assessment Phase 1B**

The Navy received comments on the draft phase 1B ecological risk assessment report from U.S. EPA and the National Oceanic and Atmospheric Administration (NOAA) on December 30, 1996, and from DTSC on January 3, 1997. The Navy feels that the suggestions received from the regulatory agencies and NOAA in their comments would be better addressed in a feasibility study for Parcel F. The Navy and the BCT met on January 30, 1997 to discuss the approach for the preparation of the draft final ecological risk

assessment report and how it would fit into a schedule for an FS, PP and ROD for Parcel F. The resolution of the meeting was: (1) the Navy would take an additional 30 days (as allowed by the FFA) to complete the response to comments, and (2) the Navy would not finalize the draft final ecological risk assessment phase 1B at this time. A proposed schedule for the Parcel F FS, PP, and ROD will be submitted at the same time as the response to comments. A meeting to discuss the scope of the Parcel F FS will be arranged after the submittal of the response to comments.

### **Radiation Issues**

The Navy is still attempting to obtain the documentation requested by the EPA in their response to the draft final Phase III Radiation Investigation Workplan which was submitted on October 13, 1996. Since the issue concerns only one of the multiple sites proposed for screening, the Navy has proceeded with field work on these other sites while resolving this one issue. The Navy began to implement the phase III radiation investigation work plan in January 1997, to allow incorporation of the results into the draft Parcel E RI report.

As was stated in the December MPR, sampling to confirm the results that the water in the subsurface secondary containment vault outside of Building 364 will be conducted as part of the Phase III radiation investigation field work. The preliminary results indicate no radionuclides at levels above discharge criteria. The results from the Phase III radiation investigation will be reported in an appendix in the Parcel E RI report.

Radiation-related field activities conducted during January included weekly inspections and maintenance of drums and bins containing potentially radioactive IDW. The remaining drums and bins of IDW from IR-01 and IR-02 will be chemically characterized and disposed of by a naval subcontractor in March 1997. The characterization data from the surveying and sampling of drums and bins of IDW in September has been analyzed and evaluation of the data does not indicate any radioactive contamination other than in two drums containing radium dials and decontamination water. Following authorization for release, the IDW will be transported off site for proper disposal.

### **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. The Navy agreed to respond to DTSC's comments in mid-October 1996, but due to the need to update the roster of new Restoration Advisory Board (RAB), the response to DTSC's comments was scheduled for submittal in late November. In the December MPR it was reported erroneously that the document was submitted on December 24, 1996; the document was actually distributed on January 31, 1997.

## **2. MEETINGS AND REPORTS SUBMITTED**

### **Meetings in January 1997**

Meetings of the Base Realignment and Closure (BRAC) Cleanup Team (BCT)/remedial project manager (RPM) meetings were held on January 7 and 30, 1997.

A RAB meeting was held on January 22, 1997. The RAB meeting in January consisted of (1) an informal discussion of the Parcel C RI report, (2) a presentation concerning the status of the ongoing removal actions at HPS, and (3) the projected budget for work at HPS in fiscal year 1997.

### Documents Submitted in January 1997

The following summarizes the documents submitted by the Navy during the report period:

- Final Revised CRP
- Revised Draft Parcel B ROD
- Draft Final Parcel D FS
- Preliminary Draft Parcel D PP

### **3. PROBLEMS ENCOUNTERED AND RESOLUTIONS**

#### Petroleum-Only Sites at Hunters Point Shipyard (HPS)

This issue occurs due to the exclusion of petroleum-only issues from CERCLA. The petroleum-only sites at HPS are being addressed as part of the Navy's voluntary corrective action plans (CAP) for petroleum contamination. To evaluate the appropriate remediation or actions for the petroleum contaminants, those sites that contained petroleum-only needed to be identified. As a result, the Navy has identified the IRP sites that (1) contain petroleum-only constituents and will be covered by the CAP; and (2) those sites that contain petroleum mixed with CERCLA regulated substances that will be cleaned up under the parcel-specific CERCLA remedial actions. This identification process will insure that all of the cleanup (petroleum and CERCLA) will be addressed in a consistent and timely manner. The preparation of these CAPs for all four parcels (B, D, C, and E) has begun, with the Parcel B CAP due in April 1997. Field sampling for bioassays began December 16, 1996. This work is being performed by AFA Construction. Initial evaluation of the field sampling indicates that another set of samples will be needed to provide samples with a gasoline component. A proposed sample location for the additional set of samples has been selected and is expected to be sampled in February.

#### Scope of the Basewide Remedial Investigation (RI) Report

The need for a basewide RI/FS/ROD was discussed by the BCT on January 30, 1997 as part of the discussion of the Draft Ecological Risk Assessment Phase 1B report and the Parcel F schedule. The resolution of that discussion was the possible need for a basewide ROD to document currently ongoing activities, such as removal actions and data gaps, that can not be included in their parcel-specific RI/FS studies due to schedule agreements. The BCT sees the possible need for a basewide ROD to document these actions completed after a particular parcel-specific ROD (which normally contains the necessary documentation). As such, the suggested approach was to remove the base wide RI/FS/ROD from the Parcel E FFA schedule and include it, if it is required, as part of the Parcel F FFA schedule which is to be proposed with the response to comments on the draft Ecological Risk Assessment Phase 1B report in March.

#### 4. REPORTS AND ACTIVITIES FOR FEBRUARY 1997

##### Documents Scheduled for Submittal in February 1997

The following documents are to be submitted in the next report period:

- Draft Final Parcel A FOST (tentatively)
- Draft Parcel C FS
- Response to Comments on the Draft Final Parcel D RI Report
- Draft Parcel C FS
- Revised HPS BRAC Closure Plan

##### Activities Planned for February 1997

**Removal Actions:** Continue work at IR 1/21, IR 3 and IR-6. Continue the removal documentation for the exploratory excavations initiated in August 1996. Continue field work on the storm drain removal action began in September 1996.

**Meetings:** Attend the BCT/RPM meeting scheduled for February 24, 1997. Attend the RAB meeting scheduled for February 26, 1997.

**Radiation Issues:** Continue the screening of Naval Radiological Defense Laboratory sites. Continue the radiation-related waste management activities until Radiological Affairs Support Office contractor takes the IDW offsite. Continue to work on the resolution of the issues that EPA has brought up regarding the draft final phase III radiation investigation field work plan.

**RI/FS Reports:** Continue the preparation of the Parcel E RI report and the Parcel C FS report.

**Proposed Plan:** Continue preparation of the Parcel D PP, after receiving comments from the BCT.

**Draft ROD Document:** Continue preparation of the Parcel B ROD after receiving comments from the regulatory agencies on the draft ROD and incorporating any comments received from the public into the responsiveness summary to be attached to the ROD. Continue preparation of the preliminary draft Parcel D ROD.

**BCT Activities:** Prepare for the monthly BCT/RPM meeting. Continue the preparation of the annual update of HPS BCP.

#### 5. KEY PERSONNEL CHANGES

None

## 6. DELIVERABLES STATUS

This listing consists of installation deliverables organized by parcel or multiparcel (or facility wide), removal actions, and their status. Please note that as deliverables are completed, they are not included in subsequent progress reports.

### Parcel A Reports

**Draft Final Parcel A FOST:** Scheduled for submittal to the agencies following resolution of the lead-based paint issue brought up by the City and County of San Francisco.

### Parcel B Reports

**Draft Final Parcel B ROD:** Originally scheduled for February 9, 1997, pending resolution of applicable or relevant and appropriate requirements (ARARs) issues.

### Parcel C Reports

**Draft Parcel C RI Report:** Submitted to agencies on November 29, 1996. Agency comments received on January 27, 1997. The response to the agencies comments along with the draft final Parcel C RI report are due 45 days later on March 13, 1997.

**Draft Parcel C FS Report:** Scheduled for submittal to the agencies on February 27, 1997. Agency review period is 45 days with comments due on April 13, 1997.

### Parcel D Reports

**Draft Final Parcel D RI Report:** Submitted to the agencies on October 25, 1996. Agency comments were received on December 3, 1996, and will be addressed in a separate attachment, to be submitted in February 1997.

**Draft Final Parcel D FS Report:** Submitted to the agencies on January 24, 1997. Agency comments on the document are due in 30 days on February 24, 1997.

**Parcel D Proposed Plan:** The preliminary draft Parcel D PP was submitted to the regulatory agencies on January 15, 1997.

### Parcel E Reports

**Draft Parcel E RI Report:** Scheduled for submittal to agencies on April 29, 1997. Agency review period is 45 days with comments due on June 13, 1997.

### Parcel F Reports

**Draft Phase 1B Ecological Risk Assessment Report:** The Navy received comments on the Draft Phase 1B Ecological Risk Assessment Report from the regulatory agencies on December 30, 1996. As a result of the extensive nature of the regulatory comments and the desire to incorporate some of the suggestions

into a subsequent FS the submittal date has been extended 30 days from the original date of February 14, 1997. The new submittal date is March 31, 1997.

### **Multiparcel/Facility-Wide Investigation Reports**

**Draft Final Phase III Radiation Investigation Field Work Plan:** Submitted to the regulatory agencies on October 15, 1996. As stated previously, discussion between the Navy and agencies will be necessary to finalize specific response to comments received from Cal/EPA and comments received from U.S. EPA on the Draft Phase III Radiation Investigation Field Work Plan.

**Draft Final Revised Community Relations Plan:** Submitted to the agencies on January 31, 1997.

**HPS BRAC Closure Plan:** Scheduled for submittal on February 28, 1997.

### **Removal Actions**

**Draft Final Construction Summary Report of Pickling and Plate Yard Removal Action:** The draft report was submitted to the agencies on August 2, 1996. Agency comments were received on October 23, 1996, and a response to EPA comments is expected to be submitted in February 1997.

**Draft Construction Summary Report of Exploratory Excavations:** To be prepared following completion of removal action.

**Draft Construction Summary Report of IR-1/21 Groundwater Removal Action:** To be prepared following completion of removal action.

**Draft Construction Summary Report of IR-3 Floating Product Removal Action:** To be prepared following completion of removal action.

**Draft Construction Summary Report of Storm Drain Sediment Removal Action:** To be prepared following completion of removal action.

7. **ABBREVIATIONS**

|        |   |
|--------|---|
| AOC    | Area of Concern   |
| ARARs  | applicable or relevant and appropriate requirements                           |
| BCT    | BRAC cleanup team   |
| CAL    | California  |
| CAP    | corrective action plan  |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act of 1980 |
| CPT    | cone penetrometer testing   |
| CRP    | Community Relations Plan  |
| DHS    | State of California Department of Health Services                             |
| DTSC   | Department of Toxic Substances Control  |
| EE/CA  | Engineering Evaluation/Cost Analysis  |
| EPA    | Environmental Protection Agency   |
| FOST   | Finding of Suitability to Transfer  |
| FS     | Feasibility Study   |
| HPS    | Hunters Point Shipyard  |
| IDW    | investigation-derived waste   |
| IR     | Installation Restoration  |
| PCB    | polychlorinated biphenyl  |
| PP     | Proposed Plan   |
| RAB    | Restoration Advisory Board  |
| RAC    | Remedial Action Contractor  |
| RI     | Remedial Investigation  |
| ROD    | Record of Decision  |
| RPM    | Remedial Project Manager  |
| SI     | Site Inspection   |

  
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Richard Powell  
Lead Remedial Project Manager

2-20-97  
Date