

5090  
Ser 62210/L9109-2  
19 Apr 1999

**From:** Commanding Officer, Engineering Field Activity, West, Naval Facilities  
Engineering Command  
**To:** Distribution  
**Subj:** MONTHLY PROGRESS REPORT FOR MARCH 1999, ENGINEERING FIELD  
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND,  
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA  
**Encl:** (1) March 1999 Monthly Progress Report (MPR)

1. Enclosure (1) is forwarded for your information.
2. If you have any questions, please contact the undersigned at (650) 244-2655.

Original signed by:   
RICHARD E. POWELL  
By direction

Distribution:

U. S. Environmental Protection Agency (Attn: Ms. Claire Trombadore)  
U. S. Environmental Protection Agency (Attn: Ms. Sheryl Lauth)  
Roy F. Weston, Inc. (Attn: Ms. Karla Brasaemle)  
TechLaw Inc. (Attn: Mr. Adam Klein)  
California Department of Toxic Substances Control (Attn: Mr. Chein Kao)  
California Regional Water Quality Control Board (Attn: Mr. David Leland)  
San Francisco City Attorney (Attn: Ms. Rona Sandler & Ms. Elaine Warren)  
Department of Public Works, Site Assessment and Remediation Division (Attn: Mr. John Chester)  
San Francisco Department of Public Health (Attn: Ms. Amy Brownell)  
San Francisco Public Utilities Commission (Attn: Ms. Carole Ruwart)  
San Francisco Department of Public Health (Attn: Mr. Ed Ochi)  
City and County of San Francisco, Public Utilities Commission, Bureau of  
Environmental Regulation and Management (Attn: John Mundy)  
San Francisco Redevelopment Agency (Attn: Mr. Byron Rhett)  
Bay Conservation & Redevelopment Commission (Attn: Mr. Steve Goldbeck)  
National Oceanic & Atmospheric Administration (Attn: Ms. Laurie Sullivan)  
U.S. Department of the Interior (Attn: Ms. Patricia Port)  
U.S. Fish & Wildlife (Attn: Mr. Jim Haas)  
Agency for Toxic Substances & Disease Registry (ATSDR) (Attn: Ms. Diane Jackson)  
California Department of Fish & Game (Attn: Ms. Susan Ellis)  
California Office of Environmental Health (Attn: Ms. Margy Gassel)  
California Department of Health Services (Emeryville) (Attn: Ms. Alyce Ujihara)  
California Department of Health Services (Sacramento) (Attn: Ms. Dierdre Dement)  
Bay Area Air Quality Management District (Attn: Ms. Catherine Fortney)  
Port of San Francisco (Attn: Ms. Roberta Schoenholz)  
Ms. Bernestine Beasley

5090  
Ser 62210/L9109-2  
19 Apr 1999

Subj: MONTHLY PROGRESS REPORT FOR MARCH 1999, ENGINEERING FIELD  
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND,  
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Ms. Wendy Brumer-Kocks  
ROSES (Attn: Mr. Charles L. Dacus, Sr.)  
Ms. Janet Ellis  
Labor Neighbor (Attn: Ms. Laurie Espinoza)  
Mr. Manuel J. Ford  
Innes Avenue Coalition (Attn: Ms. Jill Fox)  
Hillside Homeowners (Attn: Ms. Bonnie Fraenza)  
ROSES (Attn: Mr. Greg Freeman)  
Lawyers Com. Civil Rights (Attn: Mr. Michael Harris)  
Forest Hill Association (Attn: Mr. James A. Heagy)  
Mr. David E. Jackson  
All Hallows Tenants Association (Attn: Ms. Helen Jackson)  
Third Street Task Force (Attn: Ms. Henrietta Jones)  
Kern Mediation Group (Attn: Mr. Douglas Kern)  
Mr. Anthony La Mell  
Mr. Hali Papazian  
ARC Ecology (Attn: Ms. Christine Shirley)  
Young Community Developers (Attn: Ms. Carol S. Tatum)  
Mayor's Hunters Point Shipyard Citizens Advisory Committee (Attn: Mr. Leon Thibeaux)  
All Hallows Young Ladies #182 (Attn: Ms. Erlinda B. Villa)  
Ms. Caroline Washington  
Senior Citizen Bayview (Attn: Mrs. Osceola Washington)  
Mr. Nathaniel White III  
San Francisco Enterprise (Attn: Mr. Andre Williams)  
Mayor's Hunters Point Shipyard Citizens Advisory Committee (Attn: Mr. Alfred Williams)  
Shoreview Residents Association (Attn: Ms. Dorothy Peterson)  
Mr. Mark Youngkin  
Southeast Alliance for Environmental Justice  
TAG (Microsearch Environmental)  
Silk V. T. Gaudin

Copies to:

NAVSEA DET RASO (Attn: LCDR Vinny Deinnocentiis)  
Tetra Tech EM Inc. (Attn: Mr. Jim Sickles)

Blind copies to:

62A, 62A.1, 622, 6221RP, 6222JT, 6223GC, 6229WR, 62210LT, 702P3  
09CNB, 7024, 60PA.2, 62A.3 (HPS CSO), 62C HPS CSO (Dave Quichocho)  
Admin Records (3 Copies)

RF

Chron File: Ser 62210/L9109-2

Activity File: HPS

# MONTHLY PROGRESS REPORT

MARCH 1999

## NAVAL FACILITIES ENGINEERING COMMAND

### HUNTERS POINT SHIPYARD

#### 1. PROGRESS DURING THE REPORT PERIOD

The Hunters Point Shipyard (HPS) 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

**PARCEL B:** As was discussed in earlier monthly progress reports, concern had been expressed about the detection of trichloroethene (TCE) in a monitoring well at Installation Restoration Site 10 in the remedial investigation. The concern was that even though the detection was at low levels that it could indicate potential degradation into vinyl chloride. The results from the resampling were presented in a brief memorandum that was submitted on March 30, 1999. The TCE was detected in the sample at approximately the same levels as in the original sampling and the potential degradation product, vinyl chloride, was not detected. Additional field work which remains from the initial data gap field effort consists of:

- (1) an additional phase of the infiltration study, and
- (2) additional sampling on the off-site property adjacent to IR- 07 and 18 to determine the extent of contamination and possible migration.

The fieldwork for the revised infiltration study is now scheduled for April 1999 with the results being incorporated in the construction summary for Parcel B-2. In addition to the evaluation of those sections with potential infiltration, the Navy is planning another attempt at removing sediments from the portions of the storm drains that are continuously submerged that they were unable to handle in the facility wide removal action of storm drain sediments conducted in 1996. The off-site work adjacent to IR-7 and IR-18, which is part of the data gaps work, will be combined with the remedial action monitoring plan well installation. This work is now planned for April 1999 and is expected to be complete by mid May 1999.

Fieldwork has been completed in a sub-portion of Parcel B (preliminarily designated as B-3 using the area designations arising from the accelerated remedial action in this parcel) to better define the boundaries of the suspected nickel plume in the groundwater in IR-7 adjacent to the shoreline. This area may require groundwater monitoring of minimum 4 quarters duration to confirm the effectiveness of the source removal action being conducted as part of the cleanup. If 4 quarters monitoring is required, it could impede the accelerated transfer of the Parcel B property to the City of San Francisco. To avoid this possible constraint, the area of the contaminated groundwater will be deleted if necessary from the property to be transferred under the B-1 Finding of Suitability to Transfer (FOST) document. The results of the field work which consisted of groundwater sampling with a Hydropunch sampler equipped cone penetrometer testing rig to evaluate the boundaries of the plume are being evaluated. The evaluation was presented in a short technical memorandum on March 12, 1999 and comments are expected from the

U.S. Environmental Protection Agency (EPA) and State of California Department of Toxic Substances Control (DTSC) in early April.

### **Remedial Investigation (RI) Documents**

**PARCEL E:** As was noted in previous progress reports, the issues concerning the need for field validation of the ecological risk assessment brought up in the RI report are to be addressed through field sampling. A report of the results will be incorporated in the draft final Parcel E Feasibility Study as an appendix. The draft final work plan for the validation study and its' Quality Assurance Project Plan Addendum have been submitted and finalized. The draft report of the results will be submitted in June 1999.

The response to comments on the draft Final Parcel E RI was submitted on October 7, 1998. Comments on the Navy's responses were received November 13, 1998 from the California Department of Health Services discussing the radiation investigation. Responses to this latest set of comments were submitted on March 1, 1999. The Parcel E RI will be considered complete once the results of the validation study have been published.

### **Feasibility Study (FS) Reports**

**PARCEL C:** Issues in regards to the draft FS such as the level and depth of cleanup, classification of groundwater as a drinking water source, and the impact of the hydrogeologic interconnections between the A and B aquifers continue to be discussed. These issues are also being discussed in regards to the Parcel D Record of Decision (ROD) and are still germane to the schedule for the submittal of the revised draft final Parcel C FS. Based on the interrelated aspects of the issues, the Navy submitted a revised schedule for the FS on March 25, 1999. Following receipt of comments from the members of the BRAC Cleanup Team (BCT) on the proposed schedule the schedules will be discussed at the next BCT/ Remedial Project Managers (RPMs) meeting on April 13, 1999.

**PARCEL E:** The submittal date for the draft final Parcel E FS was April 19, 1999. The Parcel E FS submission schedule is under discussion for revision due to delays in laboratory testing and in the validation of data and a revised schedule proposal was submitted on March 25, 1999 and will be discussed at the BCT/RPM meeting on April 13, 1999. To be included as an appendix in the FS is the evaluation of the feasibility of wetlands creation in Parcel E, which was submitted on November 3, 1998. The draft final Parcel E Data Gaps Work Plan and Sampling Analysis Plan which will include the response to agency comments is due to be submitted on April 26, 1999.

**PARCEL F:** The draft Parcel F FS was submitted on April 3, 1998. The Navy's draft response to agency comments on the draft FS was issued on January 11, 1999 with comments received from the EPA on February 25, 1999. The Navy is incorporating this work as part of a San Francisco Bay wide sediments working group internal to the Navy. A revised schedule reflecting this approach was incorporated in the schedule submittal of March 25, 1999 and will also be discussed along with the other parcel schedules at the April 13, 1999 BCT/RPM meeting.

### **Proposed Plan (PP)**

The dates for the submission of the draft PPs for Parcel C and Parcel F will have to be revised due to various raised issues, which have delayed the completion of those FS documents. The submission date for the Parcel E Draft PP is currently July 5, 1999 however it will require revision as well.

### **Record of Decision (ROD)**

The revised schedule for the Parcel D ROD continues to be discussed at the BCT/Remedial Project Managers (RPM) meetings. A revised schedule was proposed by the Navy on March 25, 1999 and will be discussed at a meeting to be held on April 13, 1999. The Navy is still evaluating their approach to the cleanup. However, in the interim they are meeting with the BCT and conducting an evaluation of the proposed excavation areas. The evaluation is using a risk management approach to determine if this is a more appropriate way to handle the cleanup rather than the original parcel wide scheme. Additional meetings to address the use of a more detailed risk management approach were held on March 9, 11, 23 and 25, 1999 with a Parcel D site walk for the BCT held on March 30, 1999.

### **Remedial Design Documents**

**PARCEL B:** The Remedial Design (RD) and remedial action documents have overlapping submittal and review cycles due to the accelerated schedule for the cleanup.

As was discussed in previous monthly progress reports, RD documents included in the latest submittal consisted of the Remedial Action Monitoring Plan, RD drawings and replacement pages for technical specifications, Confirmation Sampling and Analysis Plan, and Work Plan. The draft final revised approach to the infiltration study for the storm drains in Parcel B was submitted on March 1, 1999. Revised sections and appendices to the RD documents were submitted on March 23, 1999 updating the originally submitted documents with subsequent changes such as the addition of areas of petroleum cleanup and additional chemicals of concern that were encountered during the cleanup. The submittal of these documents completes the work on the remedial design documents for Parcel B.

The final Parcel B RA documents were submitted on March 25, 1999. Revised sections and appendices to the RA documents were submitted to update the originally submitted documents with subsequent changes such as the addition of areas of petroleum cleanup and additional chemicals of concern that were encountered during the cleanup. Currently only the addenda for storm drain work remains to be submitted for review.

**PARCEL D:** Preparation of the Parcel D preliminary RD documents has been delayed due to unresolved issues for the Parcel D ROD.

### **Remedial Action Implementation**

The Parcel B remedial action which consists of soil excavation and backfilling continues. The work in Parcel B-1 consists of 35 excavations comprising both remediation areas and de minimus areas. Of the 35 excavations requiring step outs all are complete and are being backfilled. To ensure that these open excavations do not fill up with rain water, the contractor is back-filling them with clean fill and planning to return later to dig out the area of a particular side that remained contaminated next to the clean fill. As of the end of March approximately 78,000 tons of contaminated soil had been disposed of off site from the work in B-1. Approximately 62,500 tons of backfill has been imported with 39,500 cubic yards placed in the excavations

The work in B-2 consists of excavating 65 areas, most of which are de minimus areas. Of these areas, 45 have been excavated to the original boundaries and the remaining 18 are still in progress or pending. Also ongoing in Parcel B-2 is the removal of approximately 2,300 linear feet of fuel lines and 5,800

linear feet of steam lines. As of the end of March approximately 13,200 tons of soil had been disposed of off site from the work in B-2. Approximately 2,200 tons of backfill has been imported.

### **Removal Actions**

See Section 6, Deliverables Status, for a description of the current status for the Removal Actions and a document deliverable update.

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

### **Meetings in March 1999**

The monthly BCT/RPM meeting to discuss the status of the cleanup at HPS was held on March 23, 1999. Separate meetings were held on March 9, 11, 23, 25, and 30, 1999 continuing the Parcel D risk management process in the cleanup.

A Restoration Advisory Board (RAB) meeting was held on March 24, 1999 in which the status of the community outreach for employment in the current Parcel B remedial action was presented by IT Corporation and a member of the community, Mr. Raymond Tompkins presented the results of an air monitoring study that he had participated for an area adjacent to the facility.

### **Documents Submitted in March 1999**

The documents submitted by the Navy during the report period were as follows:

- Draft Final Revised Storm Drain Infiltration Study
- Draft Groundwater Nickel Plume Delineation, A- Aquifer, Parcel B
- Final Parcel B Remedial Design Documents
- Parcel B Remedial Action Documents
- Sampling Results for Monitoring Well in IR-10, Parcel B
- Navy's Response to Comments on the Department of Health Service's Comments on the Navy's Response to Comments on the Draft Final Parcel E Remedial Investigation
- Draft Final Work Plan for Additional Data for Petroleum Corrective Action Plans
- Proposal for Revised FFA Schedules

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

### **Target Cleanup Level for Nickel in the Parcel B Remedial Action**

As was discussed in the previous monthly progress report, levels of nickel were encountered during the Parcel B remedial action which were above the target cleanup level documented in the Parcel B ROD. It appears that the nickel encountered may be due to the occurrence of nickel-rich bedrock at the site rather than due to contamination. To evaluate the possibility the Navy investigated the nature of the nickel

occurrence in conjunction with evaluating additional parameters that may be used as indicators. Following the receipt of comments from the regulatory agencies on a draft technical memorandum describing the Navy's revised approach to determining ambient nickel levels a revised technical memorandum and written responses to comments was submitted on December 7, 1998. No further comments have been received but additional discussions concerning minor points were held in March and will be reflected in a revised approach. The approach will be used in Parcel B and facility wide when nickel is encountered as a chemical of concern and documented in a revised document in April.

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

Significant issues were brought up in the comments on the draft Parcel B Petroleum Corrective Action Plan (CAP). The Navy is continuing to reevaluate its approach on determining petroleum cleanup levels based on its meeting with the RWQCB on May 7, 1998. The Navy has documented the revised approach which will be based on evaluating the current geochemical conditions in the petroleum contaminant plumes and the resultant implications for remediation in the Draft Final Work Plan for Additional Data for the Petroleum Corrective Action Plans which was submitted on March 11, 1999.

#### **Cleanup Scenario for Remedial Action at Parcel D**

The Navy has proposed a cleanup scenario at Parcel D in the Draft Parcel D ROD consisting of a cleanup to industrial use, with a goal of  $10^{-5}$  risk to industrial workers involving excavation to the groundwater table or to a maximum depth of 10 feet below ground surface to remove contaminants. The community and the regulatory agencies have expressed concern regarding the goal of a  $10^{-5}$  industrial risk and feel that a  $10^{-6}$  industrial risk is more appropriate. Previously, discussions have been held between the Navy and the BCT to discuss this issue. Discussions continue with the most recent occurring on March 9, 11, 23, 25 and 30, 1999. Many of the Draft Final Parcel D ROD issues that have been brought up in the comments from the BCT have been resolved. However, there are several significant issues that need resolution in addition to the issue concerning the level of cleanup. The issues raised could have a significant impact on the cleanup in the other parcels with a proposed industrial reuse, Parcels C and E and delays in the resolution of the Parcel D may affect the schedules for those parcels.

#### **4. REPORTS AND ACTIVITIES FOR APRIL 1999**

##### **Documents Scheduled for Submittal in April 1999**

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

- Draft Final Parcel E Data Gaps Work Plan and Sampling Analysis Plan
- Final Proposed Nickel Screening and Implementation Plan

## Activities for April 1999

**Field Work:** Continue data gaps field work in Parcel B and continue the remedial action in Parcel B sub-areas B-1 and B-2. Begin the implementation of the additional data collection for the Petroleum Corrective Action Plans.

**Removal Actions:** Continue operation of the groundwater extraction system at IR-1/21 in Parcel E.

**Meetings:** Prepare for the BCT/RPM meetings scheduled for April 13, 1999. Prepare for the RAB meeting to be held on April 28, 1999.

**Ongoing Work:** Continue work on various documents/studies/meetings.

### **5. KEY PERSONNEL CHANGES**

DTSC's RPM for HPS is still to be determined. Until the replacement is designated, Mr. Chein Kao will act as the DTSC representative on the BCT.

### **6. DELIVERABLES STATUS**

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

#### Parcel A Reports

**Final Parcel A Finding of Suitability to Transfer (FOST):** The draft Final FOST was submitted on February 18, 1999. Comments were received from EPA on March 18, 1999. Additional comments are expected from the City of San Francisco on April 8, 1999. The Navy will submit responses to the EPA and the City of San Francisco comments in the Parcel A Draft Final FOST in early May 1999.

#### Parcel B Reports

**Parcel B Remedial Design Package:** The draft final Revision 1 Remedial Design Documents were submitted on March 23, 1998. Additional minor modifications as requested by the agencies were submitted on April 10, 1998. The final documents were submitted in March 23, 1999.

**Parcel B Remedial Action Documents:** The draft final Remedial Action Documents (implementation work plan) were submitted on June 25, 1998 with a response to agency comments submitted in the first week of August. Additional minor corrections were submitted on November 24, 1998 with additional pages submitted on December 1, 1998. The final documents were submitted on March 25, 1999.

**Parcel B Infiltration Study:** The Parcel B infiltration study, which presents the proposed field investigation of the storm drain lines that are below the groundwater table and intersect contaminant plumes, was submitted on April 24, 1998. Comments were received from DTSC on May 18, 1998 and were received from the EPA and RWQCB on June 1 and 2, 1998. The draft final version was submitted on December 2, 1998 to the BCT. Comments have been received from EPA and RWQCB. The Navy submitted the draft final revised version with a response to comments on March 1, 1999.

**Parcel B Proposed Nickel Screening Plan :** The Parcel B proposed nickel screening and implementation plan was submitted on December 7, 1998. After several conference calls between the BCT concerning the approach the Navy was notified that written comments are expected from EPA on April 1, 1999. Following review of the comments, a revised version will be submitted in April.

#### **Parcel C Reports**

**Revised Draft Final Parcel C FS Report:** The submittal date was July 15, 1998. Comments were received from the EPA, DTSC and RWQCB by the end of the review period on August 31, 1998. The Navy submitted a revised schedule on March 25, 1999.

#### **Parcel D Reports**

**Draft Final Parcel D ROD:** To resolve various issues, the draft final Parcel D ROD was rescheduled by the BCT to August 21, 1998; however, due to outstanding issues the ROD will need to be revised based on ongoing discussions by the BCT. The Navy had proposed a previous submittal date that has passed. A new date was submitted on March 25, 1999.

#### **Parcel E Reports**

**Final Parcel E RI Report:** The Navy's responses to the agency comments on the draft final Parcel E RI report were submitted on October 7, 1998 and additional comments from DHS were received on November 13, 1998. The Navy submitted a response to those comments on March 1, 1999.

**Draft Parcel E Ecological Risk Assessment (ERA) Model Validation Study Report:** The submittal date for the draft ERA Validation Study Report & cleanup level technical memorandum is June 14, 1999.

**Draft Parcel E FS Report:** The draft Parcel E FS report was submitted on January 15, 1998. The submittal date for the draft Final Parcel E FS is April 19, 1999. A revised schedule for submission of this document was submitted on March 25, 1999.

#### **Parcel F Reports**

**Draft Parcel F FS Report:** The draft Parcel F FS report was submitted on April 3, 1998. The schedule for submission of the draft final Parcel F FS had been revised to May 10, 1999 to incorporate the suggestions that came out the evaluation of the integration of the Parcel E and F remedial alternatives, and to allow resolution of all outstanding issues. ; but the Navy has proposed a revised date. The Navy's response to comments on the draft Parcel F FS was submitted on January 11, 1999 and a revised schedule for the document was submitted on March 25, 1999.

#### **Facility-Wide Reports**

**Draft Final Basewide FOSL:** The draft final FOSL was submitted on January 7, 1998. Response to Agency/SFRA comments on the Draft Final Basewide FOSL was submitted on March 23, 1998. The Final Basewide FOSL of March 1998 may need to be updated before signature.

**Removal Actions**

<b>Removal Action</b>	<b>Status</b>	<b>Draft Construction Summary Report Submitted</b>	<b>Draft Final Construction Summary Report (CSR) Submitted</b>
Multi-Parcel, Exploratory Excavations	Fieldwork completed.	September 29, 1997	June 1999
IR-9 Pickling and Plate Yard Removal	Fieldwork completed. The draft final CSR report is undergoing review by the Navy. EPA submitted comments on May 14, 1998 and suggested additional discussion of the issues. The Navy will respond to EPA comments and then finalize the CSR.	August 2, 1996	Estimated 45 days after submission of Navy response to comments.
IR-1/21 Groundwater Removal Action	Received a sanitary sewer discharge permit. Start up activities for the groundwater extraction system should be completed in April.	January 29, 1999	Estimated 45 days after receipt of Agency comments
IR-3 Waste Oil Reclamation Ponds Removal Action (formerly reported as Floating Product Removal)	Fieldwork was completed.	February 26, 1999	Estimated 45 days after receipt of Agency comments
IR-6 Tank Farm Removal Action	Fieldwork completed. Comments were received on June 4, 1998 from the EPA.	February 23, 1998	June 1999

*Luann Tetricks for*  
 Richard Powell  
 Lead Remedial Project Manager

*4/15/99*  
 Date