

5090
Ser 62210LT/L9244-1
1 Sep 1999

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Engineering Command
To: Distribution
Subj: MONTHLY PROGRESS REPORT FOR JULY 1999, ENGINEERING FIELD
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA
Encl: (1) July 1999 Monthly Progress Report (MPR)

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By direction

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MONTHLY PROGRESS REPORT

JULY 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: Additional field work which remains from the initial data gap field effort consists of:

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

Fieldwork for the revised infiltration study was completed in this period and the preliminary results presented at the Base Realignment and Closure Act (BRAC) Cleanup Team (BCT) meeting held on July 28, 1999. The results of the infiltration study are expected to be presented in a technical memorandum to be submitted in August or September 1999. The off-site work adjacent to IR-7 and IR-18, which is part of the data gaps work, has been combined with the remedial action monitoring plan well installation. The monitoring wells have been installed and will be sampled in August. Results are expected to be received and validated by the end of November 1999.

The Phase IV Radiation field work was completed in Parcel D and E during this period. The field work consisted of the collection of background samples to confirm the effectiveness of the previous removal action taken behind Building 364 in Parcel D and the previous survey conducted by Building 707 in Parcel E.

Remedial Investigation (RI) Documents

All of the RI documents are now complete.

Feasibility Study (FS) Reports

PARCEL C: As was discussed in last month's monthly progress report (MPR) the revised schedule for the submittal of the revised draft Parcel C FS is January 15, 2000. The FS schedule was adjusted to allow the submittal of two documents which will be incorporated into the FS; an analysis of the classification and beneficial uses of groundwater and potential A/B interconnections issues in Parcel C, and a risk management review of the soil and groundwater proposed remedial action. The revised dates for the submittal of both of these two documents was August 15, 1999 but will need to be revised again. This revision is necessary because the risk management review document will be due 60 days after the completion of the meetings which is still to be completed (although they are expected to be complete in

August 1999) and the submittal of the groundwater technical memorandum will be delayed to allow the consideration of the issues which are expected to be raised in the review comments on the Parcel D groundwater technical memorandum which are due by August 30, 1999. The new date for the submittal of the Parcel C groundwater technical memorandum will be September 30, 1999. Currently the schedule for the submittal of the revised draft Parcel C FS has not been changed from the January 15, 2000 date based on the assumption that the delays in the two technical memoranda discussed above will not impact the delivery of the FS.

PARCEL D: The submittal of a FS addendum has been agreed to by the BCT to address several issues brought up in the Parcel D ROD discussions. The schedule was revised to allow the submittal of two documents which will be incorporated into the FS addendum, an analysis of the classification and beneficial uses of groundwater and potential A/B interconnections issues in Parcel D (submitted on July 15, 1999), and a risk management review of the proposed soil remedial action (submitted on June 21, 1999). The draft FS Addendum was scheduled for submittal on September 1, 1999 and was then extended to November 1, 1999 as requested by the U. S. Environmental Protection Agency (EPA). The current date for submittal of agency comments on the risk management memo is now September 7, 1999.

PARCEL E: The current proposed revised schedule for the submittal of the draft final FS is July 13, 2000. The schedule needs to be revised to allow the submittal of two technical memorandum documents that will be incorporated into the FS. The draft Groundwater Technical Memorandum, an analysis of the classification and beneficial uses of groundwater and potential A/B interconnection issues in Parcel E, is proposed for submittal on November 15, 1999. The draft Risk Management Technical Memorandum, a risk management review of the soil and groundwater proposed remedial action, is to be submitted on March 1, 2000. The draft final Parcel E Data Gaps Work Plan and Sampling Analysis Plan, which included the response to agency comments, was submitted on April 26, 1999. Comments on the draft final version were received from the EPA on May 13, 1999 and from DTSC on May 26, 1999 and discussions on the issues were subsequently held between the Navy and the BCT specifically discussing some of the sampling techniques to be used. Written responses will be provided in the reissued version of the work plan and sampling analysis plan, which is expected to be submitted in September 1999.

PARCEL F: The approach to Parcel F and its relationship to the Navy's bay wide sediment approach was discussed previously on May 11, 1999 where the Navy proposed that Parcel F be included in the bay wide approach. The approach would include a work plan for re-evaluating the ecological risk assessments at several facilities and proposing additional sampling if necessary for sites such as HPS. The submittal date for the draft Bay-wide Ecological Risk Assessment Work Plan was July 16, 1999 but has been revised to August 27, 1999.

Proposed Plan (PP)

The dates for the submission of the draft PPs for Parcels C, E and F have been revised to accommodate proposed changes to the submittal schedules for the documents which precede the PPs. The revised submission dates are July 15, 2000 for Parcel C, October 11, 2000 for Parcel E and April 19, 2001 for Parcel F. To allow for a revision to the Parcel D ROD based on the results of the ongoing risk management review process, a revised PP for Parcel D was scheduled for submittal on November 30, 1999. However, based on the extended regulatory review period for the risk management memo, the schedule for the revised PP is now February 1, 2000.

Record of Decision (ROD)

The revised schedule for the Parcel D ROD continues to be discussed at the BCT/Remedial Project Managers (RPM) meetings, but the current schedule for submittal of the draft Parcel D ROD is May 15, 2000. The Navy is still evaluating their approach to the cleanup. However, in the interim they met with the BCT and conducted a re-evaluation of the proposed excavation areas. The evaluation used a risk management approach to determine if this is a more appropriate way to handle the cleanup rather than the original parcel wide scheme. The results of the evaluation process were documented in a technical memorandum that was submitted on June 21, 1999.

Remedial Design Documents

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

As was discussed in last months' monthly progress report the Navy, DTSC and EPA are involved in an informal dispute process regarding the appropriate mechanism to enforce institutional controls. Within the Parcel B ROD it was stated that the remedial design package would include an appendix that would detail how the institutional controls which are used as part of the remedy would be implemented and enforced. The Navy had proposed in that appendix (appendix A) the use of a quitclaim deed, while DTSC proposed a land use restriction covenant. To address the issue the Navy requested an extension for the response to the agency comments from the original date of June 18, 1999 to July 23, 1999. This extension request was not agreed to by EPA and DTSC, but a meeting to discuss the issues was held with the Navy on June 7, 1999. As a result of that meeting and several subsequent conference calls on June 30, 1999 the Navy then modified their request for an extension to July 2, 1999 and proposed to drop the use of a quitclaim deed and proposed a Land Use Control Implementation Plan (LUCIP). This approach would be described in Appendix A. EPA expressed concern over the contents of the LUCIP and requested an extension until July 28, 1999 to further resolve the issues. The Navy and DTSC have agreed with the approach and a revised Appendix A was to be submitted on July 30, 1999 along with a schedule for the LUCIP. Since some of the EPA issues regarding the LUCIP remain to be resolved and following a meeting of the respective legal staff a revised schedule if necessary will be issued. The current proposed schedule for the LUCIP calls for the submittal of the draft on October 15, 1999 and the draft final on January 15, 2000.

Additional secondary documents which support the Remedial Design documents consist of the Final Technical Memorandum on the Distribution of the Bay Mud Aquitard and Characterization of the B-Aquifer in Parcel B which was also expected to be submitted in July 1999 but has been delayed until August and the Draft Parcel B Infiltration Study Report which was to be submitted in July 1999 but has also been delayed until August. As was mentioned in the fieldwork section above, the preliminary results were presented at the July 28th BCT/RPM meeting.

Currently only the addenda for storm drain work remains to be submitted for the remedial action documents. If work on the storm drains is found to be necessary the addenda will be prepared following the evaluation of the results of the infiltration study.

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 current Parcel B remedial action activity is almost complete. The work in Parcel B-1 and B-2 consisted of 101 excavations comprising both remediation areas and de minimus areas. Of the 101 excavations requiring step outs all are complete and a majority have been 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 July approximately 99,000 tons of contaminated soil had been disposed of off site from the work in B-1 and B-2. Approximately 104,000 tons of backfill has been imported for backfilling the excavations.

At the BCT/RPM meeting on July 28th the Navy presented the current status of the cleanup and proposed halting the excavation based on the excessive number of stepouts which creates a situation in which meeting the cleanup goals of the ROD is both technically and practically infeasible. Those areas that did not meet the goals stated in the ROD could be addressed by the use of institutional controls. Based on the concerns expressed by the BCT a meeting to further review the issues is scheduled for September 9th.

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 July 1999

A BCT/RPM meeting was held on July 28, 1999 in the morning, with an afternoon meeting to discuss the Parcel B remedial action status. Meetings were held between the Navy and the regulatory agencies to discuss the Parcel C risk management review on July 1st, 8th, 13th, and 29th, 1999, and the Ecological Risk Assessment Validation Study on July 15, 1999.

A Restoration Advisory Board (RAB) meeting was held on July 28th during this period.

Documents Submitted in July 1999

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

- Draft Parcel D Groundwater Technical Memorandum
- Draft Final IR-3 Waste Oil Reclamation Ponds Removal Action Post Construction Report
- Draft Final IR-1/21 Industrial Landfill Removal Action Post Construction Report
- Response to Comments on the Draft Final Work Plan for Additional Data for the Petroleum Corrective Action Plans

3. PROBLEMS ENCOUNTERED AND RESOLUTIONS

Target Cleanup Level for Nickel in the Parcel B Remedial Action

As was discussed in previous monthly progress reports, 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. One additional comment was received from EPA on April 1, 1999 and additional discussions concerning minor points were held in March and April, which have been 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 will be documented in a revised document. The revised document and responses to EPA's comment will be submitted August 6, 1999.

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 has documented a 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. Response to comments on the draft final work plan from the Regional Water Quality Control Board (RWQCB) and ARC Ecology were submitted on July 15, 1999. The schedule for the submittal of the Draft Final Parcel B Petroleum Corrective Action Plan is November 12, 1999.

Cleanup Scenario for Remedial Action at Parcel D

As was discussed in previous monthly progress reports, discussions have been held between the Navy and the BCT to discuss the issue of the cleanup approach for the soil cleanup in Parcel D. To resolve the issues, it was determined that a review of the risk management process and the proposed remediation areas by the BCT could provide a fully protective remedy for human health and environment while being cost effective. The process, which took ten meetings to complete, was documented in a technical memorandum that was submitted on June 21, 1999. Based on the results of this process, the ROD for Parcel D would be revised to reflect the changes that may result. The issues raised by such a risk management review process could have a significant impact on the cleanup in the other parcels with a proposed industrial reuse, and a similar review is expected in Parcels C and E. The delays required to conduct such reviews are reflected in the revised FFA schedules for those parcels.

Revised FFA Schedules

The Navy and the members of the BCT have been discussing the need for revised FFA schedules for the parcels at HPS. A conference call was held on May 4, 1999 to further discuss the issues and agree on new FFA schedules. The new FFA schedules agreed to in that conference call were included in a letter from the EPA received on May 12, 1999 and will be submitted by the Navy in September 1999 following

finalization of the dates by the BCT. Additional revisions to the FFA schedules were also discussed in the BCT/RPM meeting on July 28, 1999 for Parcel E.

4. REPORTS AND ACTIVITIES FOR AUGUST 1999

Documents Scheduled for Submittal in August 1999

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

- Final Construction Summary Report for the Pickling and Plate Yard Removal
- Final Proposed Nickel Screening and Implementation Plan
- Revised FFA Parcel E Schedule

Activities for August 1999

Field Work: Complete the data gaps field work in Parcel B and continue the remedial action in Parcel B sub-areas B-1 and B-2.

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

Meetings: Prepare for the BCT/RPM meeting scheduled for September 9, 1999. Also prepare for the RAB meeting to be held on August 25, 1999, the ecological risk assessment validation meeting to be held on August 4, 1999, and any Parcel C risk management review meetings if necessary.

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 of February 16, 1999 for Parcel A was submitted to the Agencies and the San Francisco Redevelopment Agency. Comments were received from EPA on March 18, 1999. Additional comments were received from the City of San Francisco on April 13, 1999. The Navy submitted responses to the EPA and the City of San Francisco comments on the Parcel A Draft Final FOST on May 17, 1999. The draft Final FOST and the Navy response to Agency comments were forwarded to the RWQCB for review June 15, 1999. Comments are expected on August 4, 1999.

Parcel B Reports

Parcel B Remedial Design Package: The final documents were submitted in March 23, 1999 however based on comments from the EPA and DTSC additional response to comments are necessary and are expected to be submitted after institutional controls discussions are concluded.

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 revisions to the final Remedial Action Documents were submitted on May 5, 1999 with additional minor revisions on June 15, 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 and is implementing the work and expects to submit the results in August 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 received written comments from EPA on April 1, 1999. Following review of the comments, a revised version was to be submitted in May but now is expected to be submitted August 26, 1999.

Draft Final Parcel B Petroleum Corrective Action Plan: The draft final version of this document is due to be submitted to the RWQCB on November 12, 1999

Parcel C Reports

Draft Parcel C Risk Management Review Report: The revised submittal date for this document is August 15, 1999 but may require revision based on the time required by the BCT to review the data and subsequent document preparation.

Draft Parcel C Groundwater Technical Memorandum: The revised submittal date for this document is September 30, 1999.

Revised Draft Final Parcel C FS Report: The revised submittal date is January 15, 2000.

Parcel D Reports

Draft Parcel D Risk Management Review Report: The document was submitted on June 21, 1999 and comments are expected from the agencies by September 7, 1999

Draft Parcel D Groundwater Technical Memorandum: The document was submitted on July 15, 1999 with 45 days for review, and comments are due from the regulatory agencies by August 30, 1999.

Draft Final Parcel D ROD: The revised submittal date is August 15, 2000.

Parcel E Reports

Draft Parcel E Risk Management Review Report: The revised schedule for the submittal of this document will be proposed by the Navy to the BCT in August 1999. The proposed schedule will need to be agreed to by the BCT.

Draft Parcel E Groundwater Technical Memorandum: The revised schedule for the submittal of this document will be proposed by the Navy to the BCT in August 1999. The schedule will need to be agreed to by the BCT.

Final Parcel E RI Report: This document is now considered complete with the submittal of the draft ecological risk model validation study on June 14, 1999.

Draft Parcel E Ecological Risk Assessment (ERA) Model Validation Study Report: The draft ERA Validation Study Report & cleanup level technical memorandum was submitted on June 14, 1999.

Draft Parcel E FS Report: The proposed submittal date for the draft Final Parcel E FS is September 13, 2000. The schedule will need to be agreed to by the BCT.

Parcel F Reports

Please note that Parcel F has been incorporated into the Navy's bay-wide Sediments Working Group which is addressing sediment contamination and cleanup on a regional basis. The documents for the Parcel F portion of HPS will be included within these regional documents.

Draft ERA Work Plan: The revised submittal date for this document is August 27, 1999.

Draft Parcel F FS Report: The revised preliminary draft Parcel F FS report is to be submitted in November 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

Removal Action	Status	Draft Construction Summary Report Submitted	Draft Final Construction Summary Report (CSR) Submitted
Multi-Parcel, Exploratory Excavations	Fieldwork completed.	September 29, 1997	June 10, 1999
IR-9 Pickling and Plate Yard Removal	Fieldwork completed. The Navy has reviewed the draft final CSR report. 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 in August 1999.	August 2, 1996	To be submitted in August 1999.
IR-1/21 Groundwater Removal Action	Ongoing operations and maintenance continues for the groundwater extraction system.	January 29, 1999	July 1999
IR-3 Waste Oil Reclamation Ponds Removal Action (formerly reported as Floating Product Removal)	Fieldwork was completed.	February 26, 1999	July 1999
IR-6 Tank Farm Removal Action	Fieldwork completed.	February 23, 1998	Submittal postponed pending Parcel B risk management discussions.



Richard Powell
Lead Remedial Project Manager

9-1-99

Date