



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 17, 2000

Mr. Richard Mach
Southwest Division Naval Facilities
Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5180

RE: Aboveground/underground Tank Cleaning and Removal Work Plan, Hunters Point Shipyard

Dear Mr. Mach:

EPA has completed its review of the above referenced document. Comments are included as an attachment. If you have any questions regarding these comments, please call me at (415) 744-2409.

Sincerely,

A handwritten signature in black ink, appearing to read "Claire", followed by a long horizontal flourish.

Claire Trombadore
Remedial Project Manager

cc: Mr. Chein Kao, DTSC
Mr. Brad Job, RWQCB
Ms. Sheryl Lauth, EPA
Mr. Jason Brodersen, TTEMI
Mr. Adam Klein, Tech Law Inc.
Mr. John Chester, City of SF
Ms. Amy Brownell, City of SF
Mr. Dave DeMars, Navy

USEPA Review and Comment
Aboveground/Underground Tank Cleaning and Removal Work Plan
Hunters Point Shipyard

GENERAL COMMENTS - WORK PLAN

1. The Work Plan, Aboveground/Underground Tank Cleaning and Removal, Hunters Point Shipyard (the WP) does not address the issue of on-site dismantling of tank system components. Tanks and/or piping may be too large for off-site transport/recycling/disposal without size reduction. Dismantling operations provide an opportunity for spreading contaminants. For example, cutting a tank with a torch could volatilize contaminants remaining on the tank system's inner surfaces and dismantling activities conducted on a polyethylene sheet pose the risk of puncturing the plastic sheet. Please provide information regarding expected tank system dismantling activities and precautions to be taken to prevent the spread of contaminants during dismantling.
2. The Navy may want to briefly review the RCRA issues EPA identified on the Pickling and Plate Yard Removal Action Construction Summary Report just to ensure the same issues do not become potential problems with this removal action as it pertains to ASTs potentially containing RCRA hazardous wastes.

SPECIFIC COMMENTS - WORK PLAN

1. **Section 3.7.4, page 3-4, paragraph one.** The WP states that stockpiles of contaminated soil will be established and maintained in accordance with RCRA regulations and guidelines. While this may be a typical procedure for underground petroleum product tank excavations, it may not be appropriate for soil impacted by hazardous wastes. The WP does not explain which RCRA regulations are applicable nor does the WP describe how the activity conforms to the regulations. For example, under RCRA, a generator can accumulate waste for up to 90 days in tanks or containers without a permit provided that certain facility standards are met. Generator accumulation on a waste pile requires a permit and compliance with different facility standards. Please revise the WP by citing the RCRA regulations/guidelines applicable to the various WP activities and please describe how the activities comply with the cited RCRA regulations/guidelines.
2. **Section 4.3, page 4-2, paragraph two.** The WP states that aboveground storage tanks (ASTs) to be recycled will be rinse-sampled, as described in the Sampling and Analysis Plan (the SAP). We were unable to locate the procedure for tank rinse-sampling. Please clarify where in the WP or the SAP the rinse-sampling procedure is described.
3. **Section 4.3, page 4-2, paragraph two.** The WP stresses adequate tank cleaning and cleaning documentation to allow recycling metal tank components, but does not provide sufficient information regarding the cleaning and disposition of non-metal components such as concrete tanks and brick liners. Please provide additional details regarding the cleaning and disposition of non-metal tank components.
4. **Section 4.6.3, page 4-5, paragraph one.** The WP states that polyethylene sheets will be

used to temporarily stage removed tank piping and minimize the spread of rinsate and other waste materials. Please describe any run-on and runoff controls that will be used during the temporary staging activities.

5. **Section 4.8.1, page 4-7, paragraph one.** The WP states that potentially contaminated soil will be excavated and typically stockpiled on 10-mil plastic sheets. However, the WP does not specify the type of plastic sheets, and 10-mil thick plastic sheets may not be sufficiently sturdy to ensure that stockpiled soil does not impact soil beneath the plastic sheeting. Additionally, because of the wide variety of chemicals that were used in the AST/USTs, there is the potential for the plastic sheets to be chemically incompatible with the soil contaminants. It is possible that solvent-laden soil or low/high pH soil placed on plastic sheeting could attack incompatible plastic, resulting in a release of contaminants to the subsurface. Please provide additional information regarding the type of plastic sheets that will be used for the soil stockpiling, or alternatively, please indicate which type of plastic sheeting will be used for soil potentially contaminated with the different chemicals of concern identified at each AST/UST site.

ERRATA AND OMISSIONS - WORK PLAN

1. **Section 2.5, page 2-5, paragraph four.** The text refers to a Bldg. 302 drip tank as AST A302-2 while Table 1 refers to the same tank as U302-2. Please correct this discrepancy.
2. **Section 2.5, page 2-5, paragraph six.** The text refers to a Bldg. 302 tank as A302-1 while Table 1 refers to the same tank as U302-1. Please correct this discrepancy.
3. **Section 2.5, page 2-5, paragraph six.** The text designates a Bldg. 302 drip tank as AST A302-2 while Table 1 refers to the same tank as U302-2. Please correct this discrepancy.
4. **Table 1, first column.** Tanks A439-1 and A439-2 are designated as U439-1 and U439-2 in the text. Please correct this discrepancy.

GENERAL COMMENTS - FIELD SAMPLING PLAN

1. The descriptions of the ASTs presented in Section 2 of the Field Sampling Plan (FSP) do not indicate if the ASTs are contained within a bermed area, or whether the tanks are mounted above concrete, asphalt or soil. The presence or absence of concrete or asphalt beneath the ASTs would have a significant impact on the potential for contaminants that may have leaked from the ASTs to spread to the subsurface. Please revise the FSP to provide this information, if available.
2. Section 4.1 of the FSP describes the regulatory requirements for closure of USTs and ASTs. This section states that the *Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites* (State of California, 1990, the Tri-Regional Guidelines) will be used to address sampling requirements for USTs with wastes, used oil and unknown contents, and that since there are no guidance documents for ASTs, the closure of ASTs will be addressed in a similar manner as the USTs. According to Section II of the Tri-Regional Guidelines (page 6),

“At a minimum a visual inspection of the tank system, and soil samples (and ground water samples when appropriate) are required. Laboratory analyses of samples are necessary to comply with the provisions of Subchapter 16...**Laboratory analyses are required for closure decisions**”. However, according to Sections 4.5.1 through 4.5.7 of the FSP (pages 4-7 through 4-9), soil samples will only be collected if visual staining is evident at the ASTs. Some of these tanks have unknown prior uses or contain clear aqueous liquids, and the absence of surface staining under these conditions may not adequately demonstrate that there have not been releases to the environment. Additionally, this approach appears to contradict the Tri-Regional Guidelines, which require the collection of soil samples for tank closure. Please revise the FSP to indicate soil samples for laboratory analysis will be collected from beneath each of the ASTs. Alternatively, please provide additional justification for the Navy’s recommended approach.

3. Table 4 of the FSP presents a Summary of Field Sampling and Analysis. However, this table is organized according to analytes, and does not address the specific sampling requirements for each AST/UST. While it is recognized that the Chemicals of Concern for each AST/UST are listed in Table 1 of the FSP, and the number of field samples for each matrix are listed in Table 4 of the FSP, it is still not clear from these two tables how many samples will be collected from each area, and what type of samples will be collected. Please revise Table 4, or provide an alternative table which specifies the type (liquid, soil, groundwater and waste) and number of samples to be collected for each AST/UST, and the analytes for each of these samples.
4. Section 4 and Table 1. For clarity and ease of review, would it be possible to identify in Section 4 and Table 1 which parcels the tanks are located?

SPECIFIC COMMENTS - FIELD SAMPLING PLAN

1. **Section 4.6, page 4-9, paragraph two.** The FSP states that final disposition of all waste will be determined within 90 days of the accumulation start date. Please clarify text to state that no RCRA hazardous waste will be stored at HPS in excess of 90 days and that all RCRA hazardous wastes will be disposed of in accordance with RCRA requirements within 90 days of the accumulation start date.
2. **Section 4.6.1, page 4-10, paragraph one.** The FSP states that tank cleaning rinsate will be collected in either 55-gallon drums or a Baker tank, and that one sample will be collected and analyzed for the listed parameters. If the rinsate is stored in multiple 55-gallon drums, one sample may not provide an accurate characterization of this waste stream. In particular, it may not be appropriate to composite samples for volatile organic compound (VOC) analysis. Please revise the FSP to state that if the tank cleaning rinsate is stored in multiple containers, then either multiple samples will be collected for waste characterization, or a composite sample will be collected for waste characterization. Alternatively, please explain how one sample will adequately characterize a variable waste stream collected in multiple containers.
3. **Section 4.6.4, page 4-11, paragraph one.** The FSP states “...As a basis for

characterization...the following analysis may be performed...". The statement is followed by a list of analytical parameters. Please clarify how the determination of which analyses will be applied to which waste stream will be made.

ERRATA AND OMISSIONS - FIELD SAMPLING PLAN

1. **Section 4.6.3, page 4-10, paragraph one.** The FSP states that soil cuttings will be stockpiled on 10-millimeter plastic sheets, which differs from the WP, which states that soil will be stockpiled on two layers of 10 mil plastic sheets. Please note that 10 millimeters is approximately equivalent to 390 mils. Please correct this discrepancy.
2. **Table 4, page 2.** The heading "AST Soil Characterization (Estimated)" has footnote 2, however, there is no footnote at the end of the table. Please correct this discrepancy.

SPECIFIC COMMENTS - ENVIRONMENTAL PROTECTION PLAN

1. **Section 3.1.2, page 3-1, paragraph one.** The Environmental Protection Plan states that a temporary facility will be set up for decontaminating all equipment leaving the site. Please describe any controls to prevent run on/runoff and percolation into the soil from decontamination activities at this temporary facility.

ERRATA AND OMISSIONS - ENVIRONMENTAL PROTECTION PLAN

1. **Section 1.2, page 1-1, paragraph one.** The Environmental Protection Plan states that 27 tanks are to be removed. The Work Plan states that 25 tanks are to be removed and two closed in place. Please correct this discrepancy.

ERRATA AND OMISSIONS - CONTRACTOR QUALITY CONTROL PLAN

1. **Definable Features of Work Matrix, second column.** Paragraph numbers listed in this table do not correspond with paragraph numbers in the text. Please correct this discrepancy.
2. **Definable Features of Work Matrix, third column.** Work Plan paragraph # 4.7.1, listed in the table as 'Removal of ASTs' appears in the text as 'Sampling of ASTs'. Work Plan paragraph # 4.7.2, listed in the table as 'Removal of USTs' appears in the text as 'Sampling of USTs'. Please correct this discrepancy.
3. **Testing Plan and Log, first column.** Work Plan paragraph numbers shown on this table do not correspond to paragraph numbers in the text. Please correct this discrepancy.
4. **Testing Plan and Log, last column.** Please provide a specification number for the Asphalt Mix test shown on the table as 'Standard Caltrans'.