



California Regional Water Quality Control Board

San Francisco Bay Region



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Secretary for
Environmental
Protection

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Commanding Officer
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
San Diego, Ca 92132-5190
Attention: Mr. Richard Mach

July 12, 2000
File 2169.6032 (LBJ)

Subject: Comments on Aboveground/Underground Tank Cleaning and Removal Work Plan, Hunters Point Shipyard, San Francisco, California.

Dear Mr. Mach:

Regional Board staff have reviewed the document titled *Aboveground/Underground Tank Cleaning and Removal Work Plan, Hunters Point Shipyard, San Francisco, California* dated June 23, 2000. Overall, it appears that the plan adequately addresses the concerns that were discussed on our May 31, 2000 meeting. Below, we have identified several additional minor concerns. Provided that you concur with our recommendations, we do not believe that it is necessary to revise this document, but rather document your concurrence in a brief letter.

Work Plan

4.2.2. Permits and Notifications: Please provide RWQCB with a detailed schedule for fieldwork. In particular, we request at least 48 hours advance notice of removal and/or sampling at the following tank sites: Building 258 - Tanks 1-11; Building 203 - Tank 203-2B; and Building 302 - Tanks U302, U302-1, U302-3. Please be prepared to provide split samples at some or all of these locations.

Sampling and Analysis Plan

4.2.2. Product Tank Contents: Regional Board staff believes that in the case of Building 258, it would be instructive to analyze product samples for halogenated VOCs using Method 8260B.

4.4 Groundwater Sampling: Per the Tri-Regional Guidelines, in the event that groundwater is encountered in the tank pit, it will be necessary to collect and analyze a sample. We recommend that the same analyses be performed upon the potential pit water sample as are specified for tank removal soil samples.

Quality Assurance Project Plan

Regional Board staff was unable to locate within the QAPP where it is specified that silica gel cleanup will be performed on extractable TPH analysis. Please ensure that it is stated explicitly if silica gel cleanup will be performed on soil and/or groundwater extracts.

Site Health and Safety Plan

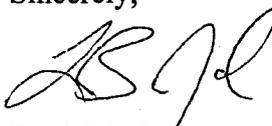
Although we require work plans to be accompanied by a health and safety plan, review of such plans is outside the scope of the Regional Board's authority.

Environmental Protection Plan

In the event that excavations or soil stockpiles are left unattended overnight, it is appropriate to restrict access to the site by placing temporary fencing or caution tape. In the event stockpiles or excavations are left unattended for a longer period of time, fencing should be constructed and a routine visual monitoring schedule should be enacted to ensure that site security and environmental protection measures are not compromised.

Should you have any questions regarding this matter, please contact me via email at lbj@rb2.swrcb.ca.gov or at (510)-622-2400.

Sincerely,



Brad Job, P.E.
Assoc. Water Resources Control Engineer

cc:

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