



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

November 1, 2001

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BRAC Environmental Coordinator
for Hunters Point Shipyard
Southwest Division, Naval Facilities Engineering Command
1220 Pacific Coast Highway
San Diego, CA 92132-5190

**RE: DRY DOCK 4 EMERGENCY REMOVAL ACTION HUNTERS POINT
SHIPYARD**

Dear Rich,

The purpose of this letter is to provide EPA's position on the Navy's emergency removal action at Dry Dock 4 (DD4). The Navy has leased DD4 at Hunters Point Shipyard (HPS) to a contractor for decommissioning old Navy ships. This use of DD4 is ending, which leaves the Navy with the alternative of leaving DD4 dry or of flooding it by opening it to San Francisco Bay. There are issues to be addressed for either alternative. DD4 will not stay dry because groundwater infiltrates into DD4, sea water seeps around the caisson (the caisson closes DD4 off from San Francisco Bay) and rainwater accumulates in DD4; this water must be removed and disposed of. The Navy does not currently have the equipment to dewater DD4 and periodic disposal of the water that accumulates would be expensive. The Navy has chosen to have the current contractor flood DD4 before the contractor leaves; this will be done at no cost to the Navy.

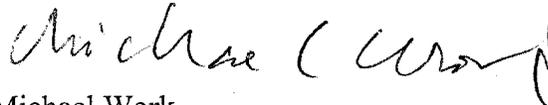
There are approximately 2200 feet of drainage pipes beneath DD4 that would also be flooded when DD4 is opened to San Francisco Bay. Over half of these drainage pipes are full or almost full of contaminated sediments that could leach contamination into sea water in San Francisco Bay. The Navy tried to remove a portion of the sediments from the drainage pipes in 1997 using a variety of techniques. High-pressure washing and other techniques did not work and the Navy discovered that these sediments had become a solid mass resembling asphalt. The only effective way to remove the sediments was manual chipping. Unfortunately, some of the pipes are only 24 or 36 inches in diameter, so manual sediment removal from all of the pipes was not possible or cost effective and many of the pipes are still full of sediment. About 6 inches of additional sediment has accumulated in the drainage pipes since 1997. The sediment remaining in the pipes was tested and the Navy learned that contaminants can dissolve (leach) into water

from the sediments. In order to minimize the potential for contamination from the sediments in the pipes to dissolve into San Francisco Bay waters when DD4 is flooded, in October 2001, the Navy began performing an emergency removal action to encapsulate all of the DD4 drainage pipes by filling them with cement so that no sea water can enter the pipes. The Navy is also removing all liquids and loose sediment, disposing of these materials and cleaning access points and entrances prior to filling the drainage pipes and access points with cement.

The United States Environmental Protection Agency (USEPA) believes that the emergency removal action being completed by the Navy is appropriate as an interim action. USEPA agrees with the Navy that sealing the drainage pipes with cement would protect human health and the environment in the short term because sea water will not be able to contact the sediments and contaminants will not be dissolved from the sediments and released to San Francisco Bay as long as the cement seal is in place. The short-term effectiveness of this interim action should be adequate, however the long-term effectiveness is unknown because it is not possible to predict how long the cold bond seal between the new and old cement will last and because the cement in the drainage pipes and access points could crack. As a result, USEPA does not consider this action to be the final action for DD4. The Navy will have to verify that the remedy is intact under oversight by USEPA and state regulatory agencies. The final action will be based in part on an evaluation of other possible actions in the Parcel C Feasibility Study, which will be issued at a later date.

Please feel free to contact me at 415-744-2392 if you have any questions or comments.

Sincerely,



Michael Work
Remedial Project Manager
Superfund Division (SFD-8-3)

cc: (see Distribution List)

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