



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, Ca. 94105

August 24, 1989

Commander, Western Division  
Naval Facilities Engineering Command  
ATTN: Lousie Lew, Code 1811  
PO Box 727  
San Bruno, CA 94066-0720

Dear Ms. Lew:

At the request of Mr. Jeff Heath of the Naval Civil Engineering Lab, I met with Mr. Heath and Mr. Jeff Means of Batelle to discuss EPA's comments on the Work Plan and EECA for Treatment and Removal of Metal Contaminated Sandblasting Grit at Naval Station, Treasure Island, Hunter's Point Annex. A brief summary of our discussion is attached.

The two major concerns EPA has are: (1) the documents' failure to address potential air emissions (primarily contaminated dust particles from trucks and loader operations), and (2) inadequate discussion of how waste materials from decontamination operations will be handled. Mr. Heath noted that these concerns had already been raised by the Bay Area Air Quality Management District and the Department of Health Services, respectively.

Inasmuch as our meeting provided an ample opportunity to discuss these and other comments, I am providing a copy of the meeting summary in lieu of other formal comments from EPA. Please provide us with any amendments or clarifications made to the documents, or other materials prepared to respond to comments from the BAAQMD, DHS, or other regulatory agencies.

If you have any questions, please call me at (415) 974-8638.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chuck Flippo".

Chuck Flippo  
Federal Enforcement Section (T-4-6)

Encl.

~~E/N/H~~

# CONVERSATION RECORD

TIME 1:30 pm

DATE 8/23/89

TYPE  VISIT  CONFERENCE  TELEPHONE  
 INCOMING  OUTGOING

ROUTING	
NAME/SYMBOL	INT

Local: Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU: Jeff Heath, US Navy  
 Jeff Means, Batelle

ORGANIZATION (Office, dept., bureau, etc.): Naval Civil Engineering Lab

TELEPHONE NO.:

SUBJECT: EPA Review of Workplan & EECA for Hunter's Point Sandblasting Grit Removal Action (Solidification Project)

SUMMARY: I said we will defer a detailed technical review to DHS Alternative Technology Section. I noted the following general questions or concerns:

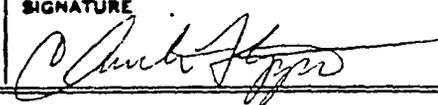
- Location is unclear; they noted site is on the Landfill, not the area designated "Fill Area" as indicated in the workplan.
- Air emissions (dust). BAAQMD has already raised this concern. They plan to wet roads to reduce dust due to truck traffic; will operate mist sprayers to reduce emissions from front-loader operations.
- Will they monitor wind direction so they'll always know "upwind"? Hadn't planned to. Will do a risk analysis at BAAQMD request to assess potential for exposure.
- Hydrogen Sulfide Monitoring: wording isn't clear that equipment will be used continuously during operations. They said it will.
- More detail is needed on decon operation (how exactly they'll collect and handle decon washwater, etc.) They will collect it and reuse it on the pile.

We also discussed EPA's greater involvement in oversight since the site is now proposed for the NPL. Roles of the various regulatory agencies will be worked out; for now, we will review documents as well as DHS.

Heath will notify us when work is to commence in case we'd like to observe.

**ACTION REQUIRED**

I indicated I would send a copy of these notes in lieu of formal written comments, since most of our concerns have been raised by other agencies

NAME OF PERSON DOCUMENTING CONVERSATION Chuck Flippo	SIGNATURE 	DATE 8/23/89
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**ACTION TAKEN**

SIGNATURE	TITLE	DATE