

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704



6 September, 1989

Commanding Officer
Naval Station Treasure Island
Building I (Code 70)
San Francisco, CA 94130-5000
Attn: Kam Tung

Dear Mr. Tung:

DHS COMMENTS ON DRAFT WORK PLAN AND ENGINEERING EVALUATION AND COST ANALYSIS FOR FIELD TREATMENT AND DISPOSAL OF METAL-CONTAMINATED SANDBLAST GRIT- HUNTERS POINT ANNEX

Enclosed are comments on the draft copy of the work plan and Engineering Evaluation/ Cost Analysis (EE/CA) for Field Treatment and Disposal of Metal-Contaminated Sandblast Grit for Hunters Point Annex. The enclosed comments address the concerns of Region 2 - Emeryville Toxic Substances Control Program and the Alternative Technologies Division of the Department.

Please revise the draft Work Plan and EE/CA for Field Treatment and Disposal of Metal-Contaminated Sandblast Grit for Hunters Point Annex in accordance with our comments.

If you have any questions regarding the Hunters Point Annex, please contact Mark Malinowski at (415) 540-3591.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chein Kao".

Chein Kao
Senior Waste Management Engineer
North Coast California Section
Toxic Substances Control Program

Enclosure

cc: attached list

MM

~~D/A 64~~

Mailing List

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EPA - Region IX
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COMMENTS ON HUNTERS POINT ANNEX
DRAFT WORK PLAN for FIELD TREATMENT
DEMONSTRATION AND REMOVAL OF METAL-CONTAMINATED
SANDBLAST GRIT - July, 5 1989

Comments and questions should be addressed in the final revision of the Work Plan.

Pg	Sec	Pgph	Comments/Questions
1	1	1	Line 5. More than 3000 cubic yards of waste sandblast grit are present at HPA. Only 3000 cubic yards will be treated during this field demonstration. Please clarify the sentence in the Work Plan.
1	1	2	Line 2. Replace "corrosion control grit" with "waste sandblast grit" to maintain consistent terminology. Missing page number.
4	2.2	1	Line 7. Include the results of the Chromium III & VI testing. Identify the specific EPA method(s) used for analysis of metals in the text and in Appendix A, Tables A-1, A-2, A-3 and A-4.
5	2.3	2	How long was the waste allowed to "stabilize and cure" prior to the WET being run?
7	3	1	Since the plastic is meant to prevent contaminated material from coming in contact with the ground, precautions should be taken to ensure that the plastic is not run over by heavy equipment or otherwise caused to rip or tear. Please note in the Health and Safety section that when the plastic becomes wet (by rain or the process water) the surface may become slippery and may cause accidents.
7	3	2	Bullet 8. Please list the type of "dry chemicals" to be used.
7	3	3	Line 4. Discuss how "the appropriate amount of additional chemicals and water" will be determined, metered and added. Will the chemicals be added dry or as a liquid/slurry? The water hose should have a valve so the operator can control the stream flow and turn the water off when not in use.

Comments on HPA Sandblast Grit Fixation Draft Work Plan

Pg	Sec	Pgph	Comments/Questions
9	4.1	1	Line 8. Because of the varying proportions associated with the described mixing technique, the Department feels a single sample from each 150 cubic yard pile will not allow a valid statistical analysis of the treatment data. In this instance, where the mixing process is varied or poorly controlled, the pile values could not be pooled to define confidence limits. At least two samples are required per pile.
9	4.1	1	How many aliquots will make up the composite sample?
9	4.2	2	Line 1. Since only twenty total samples are being taken, this means only 2 QC blind replicate samples will be collected. The Department recommends that four blind replicates be collected to provide a more accurate statistical comparison.
9	4.3	2	Line 3. Samples should be kept refrigerated using blue ice or similar "packaged ice".
11	5	1	Line 3. How long will the treated material cure before sampling?
11	5	2	Line 4. All "raw" data should be submitted to the Department - Region 2, Site Mitigation Unit and Headquarters, Alternative Technologies Division.
11	5	2	Line 10. How many "treatment area" soil samples will be collected. Will locations be chosen at random? What types of analyses will be run? What compounds are you testing for?
12	bullet	7	The Department recommends one blind replicate per every 5 samples.
18	7.3.1	3	The sodium sulfide compound will also be present as dust and personnel will be required to use a respirator when conditions warrant.
18	7.3.2		Add Equipment Noise to the <u>Potential Safety Hazard</u> list and Ear plugs/Ear muffs to the <u>Required Control Measure(s)</u> .

Comments on HPA Sandblast Grit Fixation Draft Work Plan

Pg	Sec	Pgph	Comments/Questions
20	7.5		Since heavy equipment will be used, include a section on noise monitoring and use of a hearing protection program.
20	7.5.3		How often will the H ₂ S sensor be sensitized and calibrated?
21	7.6		Add bullet for Ear plugs/Ear muffs.
22	7.8.3		Please indicate that the detergent solution for respirator decontamination will be separate from the detergent solution used for all other protective equipment. How will the waste water be characterized and what is the method of treatment and disposal?
22	7.8.4		Identify the decontamination pad location and construction components. How will waste water be collected and contained at the pad? Will the waste water be transferred to barrels or Baker Tanks for characterization, treatment and disposal? How will waste water be characterized and what methods will be used for treatment and disposal? Will non-phosphate detergent, hexane, or other type of solvent or detergent be used during decontamination procedures?
23	7.9	23	This portion should also include a section on the safe operation of machinery (ie. hoppers, loaders, etc.) Personnel must ensure that electrical lines are not run through water puddles or located where the lines will be damaged by heavy equipment.
27	7.12		Provide a detailed description (as done with the disposal facilities) of the route to the nearest hospital or emergency services. A readable map, with the hospital route clearly identified, should also be included in the <u>Contingency Plans</u> . The Department recommends that emergency phone numbers, hospital route description and a route map be placed at the front of the Work Plan for easy access and reference in the case of an emergency.

Comments on HPA Sandblast Grit Fixation Draft Work Plan

Pg	Sec	Pgph	Comments/Questions
27	7.12	2	Additional emergency contacts should include the Department of Health Services and the Office of Emergency Services.
30	8	1	The Regional Water Quality Control Board does not "approve" wastes as non-hazardous.

COMMENTS ON HUNTERS POINT ANNEX
ENGINEERING EVALUATION/COST ANALYSIS for FIELD TREATMENT
AND REMOVAL OF METAL-CONTAMINATED SANDBLAST GRIT
July, 5 1989

Comments and questions should be addressed in the final revision of the Engineering Evaluation/Cost Analysis Report.

Pg	Sec	Pgph	Comments/Questions
11	V B	1	The Department would like to see the analytical results from the EPA Multiple Extraction Procedure (MEP). The MEP results should be included in the Work Plan.

[mm:hpasndwp]
Sep. 89, pg. 4/4