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HUNTERS POINT
SSIC NO. 5090.3

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
1235 MISSION STREET
SAN FRANCISCO, CA 94103**

October 11, 1990

Commanding Officer
Naval Station Treasure Island
ATTN: Eddie Sarmiento
Building I (Code 70)
San Francisco, CA 94130

Dear Mr. Sarmiento:

EPA has reviewed the revised **Workplan, Volume 1**, for the **Removal Action for Tank S-505** at Hunters Point Annex. We have the following comments:

1). **Page 29, Section 4.3.** Reference is made in the first sentence to decontaminating the tank by double rinsing. Please note that 40 CFR 761.79 requires **triple** flushing. EPA wishes to note, however, that there may be alternatives to solvent flushing which may be environmentally beneficial, especially given the large amount of solvent needed to adequately flush Tank S-505. A list of firms permitted to conduct alternative methods of decontamination is available from Joe Karkoski of EPA's Air and Toxics Division, at (415) 556-8960.

2). **Page 33, Section 4.6.1.** Since the concentration of PCBs in the tank contents is still an open question, we feel it is crucial to complete a statistically valid sampling program before decisions concerning removal of tank contents, decontamination of the tanks, and disposal of wastes are made. We believe a sampling and analysis plan should be included in the workplan which will address the minimum number of samples to be taken, QA/QC procedures, and the statistical approach to determining PCB concentrations.

In addition to the need to confirm the PCB levels in the tank contents, we remain concerned that the tests run to date on the contents of the tank do not constitute a hazardous waste determination under 40 CFR Part 262. The tank contents may be hazardous for contaminants other than PCBs. Certain of the metals found in the sludge, as report in Table B-2, such as lead and

total chrome, are high enough to warrant running the TCLP to determine whether the waste is a characteristic hazardous waste under the Toxicity Characteristic, or TC, rule (40 CFR Part 261.24). In addition to metals, the recent TC rule covers a number of organic constituents not previously covered by the EP Tox rule (which has been replaced by the TC rule).

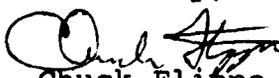
Although the treatment or disposal facility which is to receive the waste may have their own analytical requirements, 40 CFR Part 261 places on the generator the responsibility for determining whether his or her waste is hazardous. Therefore, we believe the Navy is obligated to test the tank contents for the hazardous waste characteristics under 40 CFR Part 261 Subpart C prior to arranging for its treatment or disposal.

3). Page 35, Section 4.7.2. Unless the soil removed from the berm, as well as soil removed from pipe excavation, is confirmed by analysis to be non-hazardous, it should not be removed from the Area of Contamination for storage in a waste pile as proposed. To do so would trigger Land Disposal Requirements under 40 CFR Part 268. An alternative would be storage in containers, such as roll-off bins.

4). Appendix A, page 5. We remain concerned about disturbance of surface soils containing PCBs or other potential contaminants. Neither the revised workplan nor the response to our comment resolved this concern. The detailed design and construction specifications submitted as Volume II of the workplan should address how the contractor will avoid disturbing stained areas of soil within or around the bermed area so as to minimize release of contaminants to the air.

If you have any questions concerning these comments, please call me at (415) 744-2388.

Sincerely,



Chuck Flippo
Remedial Project Manager

cc: ✓ Louise Lew, WESTDIV
Mark Malinowski, DHS
Tom Gandesbery, SFRWQCB
Scott Lutz, BAAQMD
Dave Wells, SFDPH