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5 APRIL 1991

Mr. Chuck Flippo (H-7-5)
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subj: VOLUME II, REMOVAL ACTION WORK PLAN, TANK S-505, NAVAL
STATION, TREASURE ISLAND, HUNTERS POINT ANNEX
(CONSTRUCTION PLANS AND SPECIFICATIONS)

Dear Mr. Flippo:

Enclosed please find a point-by-point response to the Environmental Protection Agency's comments on subject project. Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Julie Carver, Code 1811JC, (415) 244-2557).

Sincerely,

original signed by:

MICHAEL A. MIGUEL
Head, Environmental Restoration Branch

Encl:

(1) Point-by-point Response to EPA comments

Copy to:

Dept. of Health Services (Attn: Chein Kao)
Regional Water Quality Control Board (Attn: Steve Ritchie)
Bay Area Air Quality Management District (Attn: Scott Lutz)
U.S. Environmental Protection Agency (Attn: Chuck Flippo)
California Dept. of Fish & Game (Attn: Mike Rugg)
U.S. Fish & Wildlife Service (Attn: Steve Schwarzback)
National Oceanic & Atmospheric Administration (Attn: Chip Demarest)
Hunters Point Technical Review Committee Public Member (Attn: Rev. Arelious Walker)
City and County of San Francisco (Attn: David Wells)
San Francisco District Attorney (Attn: Steve Castleman)
Bay Conservation and Development Commission (Attn: Robert Merrill)
Department of the Interior (Attn: Bill Allen)

Blind copy to: (w/o encl) 09B, 09C9, 09A2A.43, 24, PWC SF Bay (Code 420)
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COMNAVBASE S.F. Writer: Julie Carver, Code 1811JC, x2557
NAVSTA Treasure Island Typist: B. Palmer, 5 Apr 91, EPA's comments
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**EPA COMMENTS ON TANK S-505 REMOVAL ACTION WORK PLAN,
VOLUME 2: DESIGN AND TECHNICAL SPECIFICATIONS**

1) **EPA Comment:** Section 01010. Subsections 1.1, REFERENCES, and 1.4, GENERAL DESCRIPTION, should cite "Removal Action for Tank S-505. Volume 1: Work Plan" and "Addendum to: Removal Action for Tank S-505, Volume 1: Work Plan, Asbestos Abatement Work Plan."

Navy Comment: The Navy has developed plans and specifications in accordance with the approved work plans and utilized those work plans as a basis of design/conceptual design for the plans and specifications. Although the work plans will not specifically be referenced in the plans and specifications, the Navy will refer to the approved work plans as quality control documents during their review of the submittals that will be required under the removal action contract.

2) **EPA Comment:** Section 01590. Subsection 3.3.4. should require the contractor to sample and analyze the berm structure prior to removal, if contaminated materials have spilled on it (including contaminated rinse waters).

Navy Comment: Wording has been added to Paragraph 3.3.3 of the specifications which will require the contractor to steam clean the berm area and test for PCBs in the spill area if contaminated materials have been spilled

3) **EPA Comment:** Section 02050. Subsection 1.3.1.a, Demolition Plan, contains no reference to the Removal Action Work Plan.

Navy Comment: See response to EPA Comment #1.

4) **EPA Comment:** Section 02050. A Subsection on Noise Control should be included which provides for conformance to local ordinances.

Navy Comment: A Noise Control Clause which covers the entire removal action contract is found in Section 1590, Paragraph 3.7.

5) **EPA Comment:** Section 02080. For Subsection 1.1, REFERENCES, we suggest adding the following additional references:

Code of Federal Regulations:

29 CFR 1910.120	OSHA, Hazardous Waste Operations
40 CFR Part 302	EPA, Hazardous Substances
49 CFR 171-399	DOT, Hazardous Materials Transportation

California Administrative Code:

Title 8, Article 6	CAL/OSHA, Safety: Construction - Trenching, Excavation, and Shoring
Title 13, Article 13	California Highway Patrol Hazardous Material

Title 22, Division 4, Chp.. 30 DHS, Hazardous Waste Management

California Water Quality Control Board Requirements

Uniform Fire Code, by ICBO, latest edition.

Navy Comment: Most of these regulations were already cited in Section 01110, Safety, Health, and Emergency Response which covers the removal action contract in its entirety. However, those regulations which were not already cited will be added to the appropriate sections of the final plans and specifications.

6.) **EPA Comment:** Section 02080. Subsection 1.1, REFERENCES, should include an ending statement such as "In the event of conflict between any of the above documents or with any part of this specification, the more stringent shall govern."

Navy Comment: The Navy believes that such a statement in construction plans and specifications will create an unbiddable situation. The Navy will review all of the submittals required under this contract and will, should the situation arise, determine in conjunction with the regulatory agencies, which regulation is applicable and should govern the situation.

7) **EPA Comment:** Section 02080. Subsection 1.2.2, Description of Work, makes no reference to the Asbestos Abatement Work Plan.

Navy Comment: See response to EPA Comment #1.

8) **EPA Comment:** Section 02080. Subsection 1.3.2.1, Plan for Removal and Demolition of Asbestos, should include a statement that "prior to beginning work activities at the site, establish and construct site work zone as per NAVFAC Drawing No. 6381828."

Navy Comment: This information is already provided on NAVFAC Drawing No. 6381828 and will not be duplicated in the specifications. Such duplication inevitably leads to errors should modifications to the plans and specifications be made at a later date.

9) **EPA Comment:** Section 02080. Subsection 1.3.2.3 and 1.3.2.4. references haulers and landfills "approved by the EPA." EPA does not "approve" haulers and landfills that handle waste asbestos. If you intend that the contractor send this to a landfill permitted by EPA under RCRA, you should state so specifically. Please note, however, that asbestos is not a RCRA waste and disposal of asbestos waste in a permitted RCRA landfill is not required by EPA. A second reference to an "EPA-approved sanitary landfill" appears on in paragraph 3.3.3, page 15 of Section 02080.

Navy Comment: The reference to EPA approval of these items has been deleted from the text of the specifications.

10) **EPA Comment:** Section 02080. Subsection 1.3.4.1, Air Monitoring, does not include provision for submittal of results of clearance air samples at the conclusion of the job. This submittal should document that fiber counts after final cleanup are less than 0.01 fibers per cubic centimeter of air.

Navy Comment: The provision for submittal of results of clearance air samples at the conclusion of the job is addressed in specification Section 2080, Removal and Disposal of Asbestos Materials, Paragraph 1.3.5. The execution of the air monitoring is which addressed clean up levels is described in the same specification section, Paragraph 3.2.5.3.

11) **EPA Comment:** Section 02080. Subsection 1.3.5, SD-93, Administrative or Closeout Submittals, should include:

- c. Employees' training certificates
- d. List of employees who worked at the site during the removal contract
- e. Superintendent's certification
- f. Contractor's analytical results and OSHA compliance.

Also, the number of copies required is not stated. Usually, four copies are required.

Navy Comment: This information is already required under specification Section 01110, Safety, Health and Emergency Response, Paragraph 1.4.2. The number of copies for each submittal is specified in Section 1300, Submittals, Paragraph 1.6.

12) **EPA Comment:** Section 02080. Subsection 3.2.5, Monitoring, should also include the statement: "Air monitoring shall conform to Section 6 of the Asbestos Abatement Work Plan."

Navy Comment: See response to EPA Comment #1.

13) **EPA Comment:** Section 02085. Subsection 1.1, DESCRIPTION, should include the statement: "The removal, handling, and disposal of PCB materials shall comply with all applicable local, state, and Federal laws, rules, and regulations."

Navy Comment: This statement will not be added to the text of the specifications since Section 01560, Environmental Protection, Paragraph 1.6 contains such a statement already which governs the entire removal action contract.

14) **EPA Comment:** Section 02085. For Subsection 1.2, REFERENCES, we suggest adding the following additional references:

Code of Federal Regulations:

29 CFR 1910.120 OSHA, Hazardous Waste Operations

29 CFR 1910.651 OSHA, Safety: Construction - Trenching, Excavation, and Shoring

49 CFR 171-399 DOT, Hazardous Materials Transportation

California Administrative Code:

Title 13, Article 13 California Highway Patrol Hazardous Material Transportation

California Water Quality Control Board Requirements

Uniform Fire Code, by ICBO, latest edition.

This Subsection should also include an ending statement such as: "In the event of conflict between any of the above documents or with any part of this specification, the more stringent shall govern."

Navy Comment: See response to EPA Comments #5 and #6.

15) **EPA Comment:** Section 02085. Subsection 1.5.2.1, Licenses, might be clarified by adding a parenthetical title "(Permits and Notifications)". This Subsection should also state: "Evidence that all notifications have been made as required by the applicable regulations shall be submitted to the Contracting Officer prior to the start of work."

Navy Comment: This evidence is already required under specification Section 1300, Submittals, Paragraph 1.5 and 1.6.

16) **EPA Comment:** Section 02085. A subsection on Work Zones should be added and state: "Prior to beginning work activities at the site, establish and construct a site work zone as per NAVFAC Drawing No. 6381828."

Navy Comment: This information is already provided on NAVFAC Drawing No. 6381828 and will not be duplicated in the specifications. Such duplication inevitably leads to errors should modifications to the plans and specifications be made at a later date.

17) **EPA Comment:** Section 02085. Subsection 3.1, EQUIPMENT, should be expanded to include the following:

- a. All equipment brought on-site shall be steam-cleaned and free from all contamination from previous work and in good working order, with as little leakage of hydraulic fluid, motor oil, and fuel as possible.
- b. All equipment used in or near any explosive atmosphere shall be explosion-proof, grounded, and/or non-sparking.
- c. All equipment used to haul contaminated or hazardous wastes off-site shall be operated by a licensed hazardous waste transport company.

Navy Comment: In response to EPA's comments #17.a. the Navy has added general notes to NAVFAC Drawing Numbers 6381828, 6381829, and 6381830 which require that all equipment brought on-site be free of visible soil and contamination. EPA comment 17.b. is addressed in specification Section 01110 Safety, Health and Emergency Response, Paragraph 1.1, Section 2080, Removal and Disposal of Asbestos Materials, Paragraph 1.1, and Section 2085, Removal and Disposal of PCB Materials, Paragraph 1.1. EPA comment 17.c. is addressed in specification Section 1560, Environmental Protection, Paragraph 1.1, which cites 40 CFR 263, 1989 Regulations for Hazardous Waste Transporters.

18) **EPA Comment:** Section 02085. Subsection 3.8.2, Soils and Solids, refers to "an EPA permitted RCRA PCB disposal facility." PCB disposal facilities are permitted by EPA under the Toxic Substances Control Act (TSCA), not RCRA. A number of facilities are permitted under both TSCA and RCRA so that they may handle both PCBs and RCRA regulated hazardous wastes. If the Navy's intent is to limit the contractor to that universe of facilities (anticipating, for example, the waste may contain both PCBs and RCRA regulated hazardous materials), that intent should be more clearly stated.

Navy Comment: This paragraph has been changed to read "Solids shall be transported in DOT approved containers, by licensed hazardous waste haulers to an EPA permitted TSCA and RCRA PCB disposal facility."

19) **EPA Comment:** Section 02226. We suggest adding to Subsection 1.1, REFERENCES, the Uniform Building Code, 1988 edition.

Navy Comment: The Navy does not believe that the Uniform Building Code is applicable to specification Section 02226, Site Excavation, Backfill and Compaction.

20) **EPA Comment:** Section 02226. Subsection 3.4, COMPACTION, should include a statement such as: "In the absence of a soils report, the recommendations of a soils engineer shall be followed."

Navy Comment: SD-77 Field Tests Results, which satisfy the requirements of a soils report, are already required under Section 2085, Removal and Disposal of PCB Materials, Paragraph 1.4.4.

21) **EPA Comment:** NAVFAC Drawing No. 6281829. The description of demolition requirements, "hot" metal burning or cold cutting, presented in the Removal Action Work Plan, is not repeated in nor referenced in Section 02050. Given that the drawings are likely to be the first element of the bidders package which will be closely reviewed by potential bidders, it would be appropriate to emphasize these requirements by adding a step to the Sequence of Work on the drawing between Laboratory Verification (18) and Hauling (19). This step could read: "Tank size shall be reduced by cutting into pieces of manageable size. Cold cutting is the preferred demolition technique. If hot cutting is used, the contractor shall show, by testing, that the tank atmosphere is not flammable. The Contractor's health and safety office shall witness the test."

Navy Comment: The following statement has been added to NAVFAC Drawing No. 6281829: "Cold cutting techniques shall be used if a flammable atmosphere exists."

22) **EPA Comment:** NAVFAC Drawing No. 6381829 through 6381831. The Sequence of Work should provide for a "Witness and hold" point for selected items. As an alternative, a statement should be included such as: "The Contractor shall provide a 'competent person' as specified in OSHA Regulation 29 CFR 1926.58, paragraph (e) 6. The 'competent person' shall direct monitoring and training services and shall be capable of identifying asbestos and other hazardous materials. Such person shall have authority to take prompt corrective action to eliminate hazards. Such person shall be on site during all phases if the job."

Navy Comment: A witness and hold clause has been added to selected items that the Navy believes are applicable. A 'competent person' is already required under Section 01110, Safety, Health, and Emergency Response, which governs the entire removal action contract.

23) **EPA Comment:** NAVFAC Drawing No. 6381831. Notes should include:

- a. Remove any contaminated soil surrounding the catch basin.
- b. Provide adequate shoring to avoid caving of soil.

Navy Comment: During the development of the work plan for this removal action is was agreed by all parties involved that only the soil in the immediate vicinity of

underground structures would be removed. The remaining material will be handled under the Remedial Investigation/Feasibility Study and subsequent actions required at Hunters Point Annex. Shoring requirements are addressed in specification Section 02226, Site Excavation, Backfill and Compaction, Paragraph 3.1.1.