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HUNTERS POINT
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

May 8, 1991

Commanding Officer
Naval Facilities Engineering Command
Western Division
ATTN: Louise Lew (1811)
PO Box 727
San Bruno, CA 94066

Dear Ms. Lew:

Enclosed are EPA's comments on the **Draft Plans and Specifications for the Removal Action at the Tank Farm at Hunters Point Annex.**

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

Sincerely,

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

Chuck Flippo
Remedial Project Manager

cc: Eddie Sarmiento, NSTI
Bill Brown, DHS
Tom Gandesbery, SFRWQCB
Scott Lutz, BAAQMD
David Wells, SFPD

COMMENTS ON TANK FARM REMOVAL ACTION WORK PLAN, VOLUME 2: DESIGN AND
TECHNICAL SPECIFICATIONS

COMMENT NO.

1. SECTION 02050: Subsection 3.1.1 b; The scope is unclear as to how many tanks and how many foundations are to be removed. Refer to drawings.
2. SECTION 02050: Subsection 1.5; Suggest adding 1.5.1 NOISE CONTROL: Conform to local ordinances.
3. SECTION 02050: Subsection 3.1.1c; Suggest adding that the procedures be submitted for approval by the appropriate agency.
4. SECTION 02050: Subsection 3.3.3; How do you plan to decontaminate tank foundations which you remove? Where will decontamination take place? How will cleaning fluids be collected?
7. SECTION 02080: Subsection 1.1; Correct last reference to read 1988 rather than 1888. Additionally, are there any California Water Quality Control Board requirements?
8. SECTION 02080: Subsection 1.3.6 SD-93, Administrative or Closeout Submittals should include:
 - c. Employee's training certificates
 - d. List of employees who worked at site during 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.
9. SECTION 02080: Subsection 3.3.3 Disposal of Asbestos. This section should refer to the Asbestos Abatement Work Plan.
10. SECTION 02080: General comment for this section ; This section should address the condition and type of construction equipment to be used, for example:

•All construction equipment brought on site shall be steam cleaned and free from contamination from previous work and in good working order, with as little leakage of hydraulic fluid, motor oil, and fuel as possible.

May 7, 1991

COMMENT NO.

•All equipment used in or near any explosive atmospheres shall be explosion proof, grounded/bonded, and non-sparking.

•All equipment used to haul contaminated or hazardous wastes off site shall be operated by a licensed hazardous waste transporter company.

11. SECTION 02085: Subsection 1.2: Suggest the following at the beginning of the subsection:

"The removal, handling, and disposal of PCB materials shall comply with local, state, and federal laws, rules, and regulations. The key regulations include:"

12. SECTION 02085: For subsection 1.2 REFERENCES the following additional references are suggested::

California Administrative Code:

Title 13, Article 13 California Highway Patrol Hazardous
Material Transportation

Title 8, Article 6-CAL/OSHA, Safety: Construction, Trenching,
Excavation , and Shoring

Title 22, Division 4, Chapter 30- DHS, Hazardous Waste Management

Code of Federal Regulations:

29 CFR 1910.120 OSHA, Hazardous Waste Operations

40 CFR Part 260 EPA Hazardous Waste

California Water Quality Control Board requirements

Uniform Fire Code, by ICBO, latest edition.

13. SECTION 02085: Subsection 1.6.2.1 Licenses should include parenthetical title "(Permits and Notifications)".
14. SECTION 02085: Subsection 1.6.2.1 Licenses should include a statement that "evidence that all notifications have been made as required by the applicable regulations shall be submitted to the Contracting Officer prior to start of work".
15. SECTION 02085: A subsection 1.6.6 Site Work Zones should be included and include a statement that "prior to beginning work activities at the site, establish and construct site work zone as per NAVFAC Drawing No.: 6381828"

COMMENT NO.

16. SECTION 02090: Title should include "Recycling".
17. Section 02090: General comment and points you may want to consider;
 - Recycling of tank contents may be a disposal option based on whether the tank contents are classified as a petroleum product or a RCRA-regulated hazardous waste.
 - In subsections 3.8.1 and 3.8.2 you mention "disposal and recycling facility" in the text, therefore, you may want to emphasize this throughout the document.
 - You may want to include the recycling option as a line item on the bid sheet in order to obtain a better quote.
18. SECTION 02226: According to the Work Plan no soil removal was planned; however, this section indicates excavation of up to 4 feet of soil to allow for removal of tanks and piping. If soil removal is planned, the following specific comments should be considered:
 - Change title to include "Disposal".
 - Define scope more clearly, and cross reference to drawings.
 - Drawing 6381343 maintains existing grade and calls for a 12-inch cap plus 6-inch gravel to drain. This suggests that disposal of visibly contaminated soil is not planned.
 - Subsection 3.1.3 indicates disposal of PCB contaminated material.
 - If soil removal is planned, quantify the amount and indicate where contaminated soil to be removed and possibly the vertical extent of removal.
 - If there is a time lag between contaminated soil removal and 12-inch capping, then a temporary impermeable cover should be installed to minimize surface water infiltration within bermed areas.
19. SECTION 02226: For subsection 1.1 REFERENCES the following additional references are suggested:
 - Uniform Building Code, 1988 edition

COMMENT NO.

20. SECTION 02226: Subsection 3.2; It is suggested that reference to California Administrative Code- Title 8, Article 6 - CAL/OSHA Safety; Construction, Trenching, Excavation, and Shoring be included in this paragraph.
21. NAVFAC DRAWING NO.6381339: Are you removing the foundation for the tank in Area 2? This tank is the same size as the eight tanks in Area 3. As per Work Plan page 20 of 46, all nine vertical tank foundations are to be removed (eight in Area 3 and one in Area 2). As per specification 02050 section 3.1.1.b, only tank foundations in Areas 1 and 3 are to be removed. This conflicts, please clarify.
22. NAVFAC DRAWING NO.6381340 and 6381341: The Sequence of Work should provide for "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 29 CFR 1926.58, paragraph (e) 6. '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 of job".
23. NAVFAC DRAWING NO.6381341: As per specification 02050 section 3.1.1.b, there is a concrete retaining wall in Area 4 which should not be removed. This wall should be indicated on the drawing. As per section 3.1.1.b, there is no mention of removal of foundation for the tank in Area 4. This may be the intent, but it is not indicated in specification 02050.
24. NAVFAC DRAWING NO. 6381343: D Section; Before installation of catch basins, make sure there is adequate shoring to prevent soil from caving in. E Section; Soil removal will likely be required under this tank. Minimizing soil excavation until the extent of soil contamination is fully characterized will reduce public exposure to potentially hazardous materials.