



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105

June 3, 1991

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

Dear Ms. Lew:

EPA has reviewed the draft final **Removal Action Work Plan for the Pickling and Plate Yard, Volume 1** for Hunters Point Annex. EPA approves the work plan as submitted, contingent on resolving two matters. The first matter concerns sampling of the sandblast material, while the second concerns handling of decontaminated concrete.

- 1) In the Response to Regulatory Agency Comments, Appendix A, the response to the comment at the top of page 7 states that three samples will be taken from each of three bins. These specifications are not included in Section 4.6 of the text. Does the Navy intend to specify this sampling scheme in Volume II, the design specifications document? If not, how will the Navy ensure that representative samples are taken?
- 2) The work plan states in Section 3.4.3 (page 23) that bulk samples will be taken from decontaminated concrete structures for analysis and, if found to be hazardous, taken to an EPA-permitted TSD for disposal. The Response to Regulatory Agency Comments (Appendix A) states on page 6 (bottom of page) and page 13 (response to comment 13) that if the concrete is found to be hazardous, it will be disposed of as "inorganic solid debris (ISD)" at an EPA-permitted landfill.

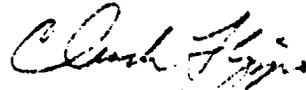
The use of the term "ISD" is confusing. Under RCRA, the concrete would be given one or more waste codes determined by the specific contaminants which exceed Toxicity Characteristic (TC) levels (e.g., D007 for chromium). If it is "hazardous" under RCRA (i.e., it exceeds one or more of the TC levels), the debris would

be subject to the Land Disposal Restrictions as ARARs. Therefore, treatment would be required prior to land disposal.

It is unclear whether the term "ISD" encompasses this understanding of the "land ban" ARAR, or whether the Navy anticipates disposal of the waste as "ISD" without further treatment. Please clarify.

EPA believes these two points can be addressed via letter without any delay in preparing Volume II of the Work Plan. If you wish to discuss these comments, please call me at (415) 744-2388.

Sincerely,



Chuck Flippo
Remedial Project Manager

cc: Jim Sullivan, NSTI
Bill Brown, DHS
Tom Gandesbery, SFRWQCB
Scott Lutz, BAAQMD
David Wells, SFPHD