



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
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October 21, 2010

Mr. Keith S. Forman  
U.S. Department of the Navy  
BRAC Program Management Office – West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310

**Subject: Draft Pier Demolition Work Plan, Hunters Point Shipyard, San Francisco, California, September 2010**

Enclosed are the comments of the U.S. Environmental Protection Agency (EPA) for the subject report, dated September 2010. If you have any questions regarding these comments, please call me at (415) 972-3156, or contact me by email at [kloss.sarah@epa.gov](mailto:kloss.sarah@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Kloss".

Sarah Kloss  
Remedial Project Manager  
Superfund Federal Facility Branch  
U.S. EPA, Region 9

cc (electronic only):

Ms. Melanie Kito, U.S. Department of the Navy, [melanie.kito@navy.mil](mailto:melanie.kito@navy.mil)  
Mr. Mark Ripperda, U.S. Environmental Protection Agency, Region 9, [ripperda.mark@epa.gov](mailto:ripperda.mark@epa.gov)  
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Mr. Ross Steenson, CA Regional Water Quality Control Board, [rsteenson@waterboards.ca.gov](mailto:rsteenson@waterboards.ca.gov)  
Ms. Amy Brownell, SF Department of Public Health, [amy.brownell@sfdph.org](mailto:amy.brownell@sfdph.org)

## EPA Comments Pier Demolition Work Plan

### General Comment

1. Based on the information provided, it is not clear where the scope of this work plan ends in reference to the waste stream. The EPP suggests that disposal is not part of the work plan scope. Is the waste processing (e.g., wood chipping) part of the work plan? If the waste processing in the North Pier area is part of this work plan, then air monitoring during that phase should be discussed in the body of the work plan. If the waste processing is outside the scope of this work plan, the document should reference the work plan/ SAP that includes the monitoring during waste processing.

### Specific Comments

1. Section 2.7, Environmentally Sensitive Areas, Paragraph 2: This paragraph states the Navy will coordinate with the appropriate BCT member. The document should be revised to either state that the Navy will coordinate with the BCT or identify the agency that is considered the appropriate BCT member.
2. Section 5.0, Pre-Demolition: Page numbers are off.
3. Section 6.2, Demolition Alternatives and Considerations: The second subsection, *Debris-Capture Mechanisms*, discusses four alternatives to capture debris. It is unclear based on the information provided why the fourth alternative, revised construction methodology will not be implemented. In addition, the explanation states that "several of these debris containment technologies are infeasible;" however, only two out of four seem infeasible based on the information provided. Please provide more justification if alternative four will not be used and discuss additional alternatives, if any, that were screened out. If only two of the four alternatives are actually infeasible, please removed the word "several".
4. Section 7.1, Bathymetric and Side Scan Surveys: Please change "appropriate BCT members" to "the BCT."
5. Section 7.5, Parcel F Shoreline and Quay Wall Radiological Survey and Remediation: Since Parcel F is large area, this section should have a figure that shows the extent of the Parcel F Shoreline Survey for this project. Further, since the scope of this project is limited to the piers and structures overlying the piers, the shoreline will not be remediated as part of this effort. Please revise this section to be clearer about what part of the shoreline will be surveyed and how the survey will be used. Also, please remove "remediation" from the title of this section.

6. Section 9.1, Public Information: The *Community Relations Plan* should be referenced in the references section of this document. Also, the second paragraph mentions that the Navy is the lead agency with state agency concurrence. Please add that U.S. EPA is the lead oversight agency.
7. Table 6-1: The regulatory contacts are not listed.
8. Figure 1-2: Dry Dock 4 is mislabeled.
9. Appendix B, EPP, Section 2.4.1: This section states that there will not be any transportation and disposal under this contract. Please add a citation of the EPP under which those actions will be happening. Section 2.8 discusses waste characterization for disposal, which is confusing if the waste will not be disposed of under this work plan.
10. Appendix B, EPP, Section 2.8.2: How will non-hazardous wastewater be disposed of?
11. Appendix D, SAP: Please add information about the sampling and analysis associated with air monitoring during this project. For example, WS #15 should have the references limits and project action limits for air monitoring. If there is another SAP that deals with air monitoring, that SAP could also be referenced.
12. Appendix D, SAP WS #16: The dates provided should be revised before issuing the final report. DTSC, WB and EPA should all fall under the same review period.