California Regional Water Quality Control Board

San Francisco Bay Region

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Arnold Schwarzenegger
Governor

Letter sent via email

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U.S. Department of the Navy
Attn: Mr. Keith S. Forman
BRAC Program Management Office – West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310
Via email only: keith.s.forman@navy.mil

Subject: Comments on the *Draft Pier Demolition Work Plan, Hunters Point Shipyard, San Francisco*, dated September 21, 2010

Dear Mr. Forman:

I reviewed the September 21, 2010 *Draft Pier Demolition Work Plan* (*Work Plan*) for Hunters Point Shipyard; the document was received at our offices on October 29, 2010. The *Work Plan* presents the activities necessary to demolish and remove several dilapidated wooden structures along the shoreline. My comments are presented below.

COMMENTS

1. **Section 6.2 (Demolition Alternatives and Considerations – Piling Demolition), p. 6-1** – This section indicates that the snapping method for pilings demolition will cause less sediment disturbance, allow mitigation of demolition debris, and is safer for the workers. Therefore, I support the Navy's selection of the snapping method for demolition of the pilings.

2. **Section 6.2 (Demolition Alternatives and Considerations – Debris-Capture Mechanisms), p. 6-3** – It is not clear if the "Revised Construction Methodology" could or will be implemented in conjunction with the "Floating Debris Boom." Please revise the text to clarify this issue.

3. **Sediment Disturbance/Turbidity Plumes** – The *Work Plan* recognizes that there will be some sediment disturbance resulting from demolition activities, but lacks a discussion of the disturbance from the selected method and any monitoring or measures that could be implemented to reduce impacts from the disturbance. For instance, will a silt curtain be deployed (e.g., from one of the booms or from temporary piles)? If not, please provide a rationale. At a minimum, there should be a monitoring program to determine if a turbidity plume(s) persists over a period of time (e.g., one hour). If a turbidity plume persists, there should be adjustments to work practices (e.g., work slowdown) or other measures, and

surface water sampling (for sediment/turbidity and pollutants known to be present in sediment or that could otherwise enter the Bay during demolition activities).

4. **Pollutant Source Assessment** – The Storm Water Pollution Prevention Plan (SWPPP; Appendix C of the *Work Plan*) should include a Pollutant Source Assessment (PSA). The PSA should identify any non-visible pollutants associated with the work (target pollutants and any pollutants present in the materials being demolished that could contact stormwater) that should be included in the monitoring program and sampled for in the event of a stormwater discharge. Background information regarding non-visible pollutant monitoring at contaminated sites is provided in the September 2, 2009 Construction General Permit Fact Sheet. Note that the *Work Plan* and the SWPPP already identified many pollutants even though the SWPPP lacks a PSA. For instance, besides potential radiological pollutants, metals (lead, cadmium, chromium), chlorofluorohydrocarbons, PCB-containing oils, PAHs (creosote), and mercury-containing equipment (see page 3-2 of Work Plan and pages 1 and 5 of the SWPPP) are identified. These and other non-visible pollutants associated with the work should be evaluated for potential inclusion in the monitoring program.

5. **Site Visit to Observe Demolition Activities** – I would like to visit the site to observe the fieldwork after the Navy and contractors begin demolition and have established the workflow.

Please contact me at (510) 622-2445 or rsteenson@waterboards.ca.gov if you have any questions.

Sincerely,

Ross Steenson

Digitally signed by Ross Steenson
Date: 2010.11.08 17:24:26 -08'00'

Ross Steenson, PG, CHG
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Cc (via email only):

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