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Ser 1832.2/L6090
24 Jan 1996

Mr. David F. Leland, P.E.
Principal Engineer
Harding Lawson Associates
105 Digital Drive
Novato, CA 94949

Dear Mr. Leland:

This letter acknowledges receipt of your letter of December 22, 1995, regarding the "Contaminated Scrap Metal Removal at the Pickling and Plate Yard" for the Engineering Field Activity, West, Hunters Point Annex, San Francisco, California. In response to your letter and after consultation with our legal Counsel, Mr. Marvin Norman, we are providing the following information about the Pickling and Plate Yard project for your review and comments:

1. To satisfy regulatory concerns, we have requested that Public Works Center, San Francisco Bay (PWCSFB) staff confirm that the scrap metal that was transported for recycling to the Circosta Iron and Metal Company at 1801 Evans Avenue in San Francisco, was actually removed from the Pickling and Plate Yard site in a condition that did not result in the inadvertent disposal of Zinc Chromate (ZC) in transit.
2. The technique of picking up scrap metal with an excavator bucket, shaking it in the air, and dropping it to the ground would presumably be effective in creating vibrations and a jarring impact that would effectively loosen any flaky ZC adhering to the scrap. If the scrap was handled in that manner prior to loading and transporting it for recycling, one can reasonably assume that ZC would not come off the scrap (as waste) in any notable quantities during transport.
3. There is no basis to conclude that the scrap metal was improperly removed from the site and erroneously handled as recyclable material. Bills of lading and follow up inquiries support a conclusion that the material has been handled as recyclable material, and the fact that HLA personnel did not personally observe the removal of the scrap metal should not preclude a determination that the work was properly completed.
4. So long as the scrap metal transported off-site by Alco was not accompanied by ZC in a condition that caused it to flake off and become discarded in transit, hazardous waste was not transported off-site. Accordingly, the three "regulatory violations" listed in your letter of December 22, 1995, would not have occurred.

In the January 10, 1996, Electronic Mail from Charles Aldred of PWCSFB, the PWCSFB staff have confirmed that the scrap steel removed from the Pickling and Plate Yard site on December 8, 1995, was in fact subjected to not only the initial pressure wash that the set of steel racks were subjected to, but also a second such pressure wash. PWCSFB staff have concluded from this information that any Zinc

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Chromate still attached to the steel would have been firmly adhering, and would not have flaked off and become discarded in transit. In addition, during a visit to the Circosta Iron and Metal Company on December 20, 1995, the HLA, PRC and Navy Pickling and Plate Yard project managers received information that the scrap steel had been processed and had been shipped to a smelter in San Leandro, California. Since PWCSFB staff has confirmed that they took appropriate actions during the December 8, 1995, removal activities, and the scrap metal has been properly transported to a final destination for recycling, we request that HLA refer to this information as part of your overall certification to EFA West that the removal action was executed in an appropriate manner.

If you have any questions regarding this letter, please contact either myself at (415) 244-2655, or Mr. William Radzevich at (415) 244-2555.

Sincerely yours,

Original signed by:

RICHARD E. POWELL
Lead RPM Hunters Point/Treasure Island
By direction of
the Commanding Officer

Copies to:
PRC Environmental Management (Attn: Mr. James Sickles)
Public Works Center, San Francisco Bay (Attn: Mr. David Recoder)

Blind copies to:
62.3, 09CMN, 1832, 1832.1, 1832.2, 1832.3
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