

5090
Ser 1832.4/L6340
15 Aug 1996

Gary Elston
International Technology Corporation
4585 Pacheco Boulevard
Martinez, CA 94553

Dear Mr. Elston:

This letter forwards the Navy's comments on various draft plans submitted for the removal actions at Site IR 1/21, Industrial Landfill Groundwater Plume (Delivery Order 60), and Site IR 50, Storm Drain System (Delivery Order 61), at the Hunters Point Shipyard.

The draft Removal Action Work Plan, the draft Contractor Quality Control Plan, the draft Sampling and Analysis Plan, and the draft Health and Safety Plan have been reviewed and accepted for sufficiency provided the comments of enclosures (1) and (2) are considered and incorporated as appropriate into the subject documents. The Navy recommends that IT Corporation make appropriate corrections prior to any work commencing at the job site. As discussed previously, International Technology Corporation cannot start field work on these removals until approval of the Action Memorandums, which are expected by August 30, 1996.

As requested previously, a copy fo the Federal Facility Agreement for Naval Station Treasure Island, Hunters Point Annex, is enclosed as enclosure (1). If you have any questions, please contact Ms. Luann Tetirick, Code 1832.4, at (415) 244-2561 or Mr. William Radzevich, Code 1832.2, at (415) 244-2555.

Sincerely,

ORIGINAL SIGNED BY:

~~RICHARD POWELL~~
Lead Remedial Project Manager for HPS/TI
By direction of
the Commanding Officer

Encls:

- (1) Review Comments for Site IR 1/21, Industrial Landfill Groundwater Plume
- (2) Review Comments for Site IR 50, Storm Drain System
- (3) Federal Facility Agreement for Naval Station Treasure Island - Hunters Point Annex

Copy to:

ROICC San Francisco Bay Area (Attn: Wayne Coffey, w/o encl (3))

Ser 1832.4/L6340
15 Aug 1996

Blind copies to: (w/o encl (3))
62.3, , 1832, 1832.4, 1832.2,
09CMN, 09CRG, HPS CSO (Eddie Sarmiento, w/o encls)
Information Repository (3 copies, w/encls
Chron, Green
Activity File: HPS (aka HPA)

REVIEW COMMENTS FOR SITE IR 1/21
INDUSTRIAL LANDFILL GROUNDWATER PLUME

Enclosure (1)

MEMORANDUM
Job Order No. 96B62BRC
29 July, 1996

RPM MS Luann R. Tetirick
Code 1832.4

From: Gilbert Nickelson, Jr., Code 18253

To: Luann R. Tetirick, Code 1832.4

**Subject: DRAFT SITE HEALTH AND SAFETY PLAN HUNTERS POINT
ANNEX SITE IR-1/21 INDUSTRIAL LANDFILL GROUNDWATER
PLUME, CONTRACT NO. N62474-93-D-2151, DELIVERY ORDER
NO. 0060**

References: (a) Draft Site Health and Safety Plan for Hunters Point Annex Site IR-1/21 Industrial Landfill Groundwater Plume. Contract No. N62474-93-D-2151, Delivery Order No.0060.
(b) 29 Code of Federal Regulations (CFR) 1910.120 (Hazardous Waste Operations and Emergency Response)
(c) 29 Code of Federal Regulations (CFR) 1926.65 Subpart D
(d) Navy/Marine Corps Installation Restoration Manual (February 1992)
(e) American Conference of Governmental Industrial Hygienist (ACGIH) 1995-1996 TLV Booklet

1. The subject document, reference (a) was prepared for ENGFLDACT WEST by IT Corporation. and is dated July,1996. I have reviewed and compared the Site Health and Safety Plan (SHSP) for environmental health compliance. to federal requirements under the Occupational Safety and Health Administration (OSHA) regulations, and to the Navy requirements under the "Navy/Marine Corps Installation Restoration Manual" (see references (b), (c), (d), and (e), above). If there are any questions regarding this (SHSP) review please contact me at (415)-244-2577, DSN 494-2577. My review comments are provided as follows:

(a) General Comments: This document contains a wealth of information, regarding the scope of work that is anticipated for the (SHSP), reference (a). The document is orderly and complete in communication in addressing requirements in accordance with references (b), through (e).

(b) Subject document, reference (a), does meet all environmental health requirements in accordance with references (b), through (e), and is therefore accepted by Code 18253. Final acceptance of this (SHSP) is dependent upon safety compliance requirements to be reviewed by Ms Regina Eng, Code 09KRE. at (415)-244-2955, or DSN 494-2955.

Good luck with this project. and be safe.

Gilbert Nickelson, Jr., Code 18253

Industrial Hygienist

30 July 96

MEMORANDUM

From: Code 09K:RE

To: Code 1832.4 (Luann R. Tetirick)

Subj: REMEDIAL ACTION CONTRACT (RAC) N62474-93-D-2151, DELIVERY ORDER 0060, SITE 1R-1/21 INDUSTRIAL LANDFILL GROUNDWATER PLUME, HUNTERS POINT ANNEX, CALIFORNIA. SITE-SPECIFIC HEALTH AND SAFETY PLAN REVIEW COMMENTS

Ref: (a) EFAWEST 1832.4 E-Mail of 9 July 96
(b) IT Corp. Site-Specific Health and Safety Plan, Revision B of July 96
(c) 29 CFR 1910.120 and 29 CFR 1926.65

Encl: (1) Safety Review Comments

1. As requested by reference (a), reference (b) has been reviewed for compliance with contract safety requirements and reference (c). I have also reviewed the environmental health comments provided by Mr. Gilbert Nickelson, Code 1825.3 Industrial Hygienist. Final acceptance of the HASP by this office is dependent upon IT Corporation review and consideration of comments provided.

2. Please request IT Corporation to review and consider the provided comments. Recommended changes should be clearly identified. This may be done in several ways: by submitting revised pages with reasons for the changes noted, by the use of ~~strikeout~~ and underline, by the use of shading and italics, or by cover letter stating how each comment has been addressed.

3. For clarification of the above items, please contact the undersigned at (415) 244-2955.

REGINA ENG

Copy to: 09K: Chron, Contract (w/c ref (b)), 1825GN, RE

Subj: REMEDIAL ACTION CONTRACT (RAC) N62474-93-D-2151, DELIVERY ORDER 0060, SITE 1R-1/21 INDUSTRIAL LANDFILL GROUNDWATER PLUME, HUNTERS POINT ANNEX, CALIFORNIA, SITE-SPECIFIC HEALTH AND SAFETY PLAN REVIEW COMMENTS

1. Sec. 2.0 and Table 11-1. When known provide the ROICC names of Project Superintendent, Site Health and Safety Officer and his/her alternate, and update Table 11-1.
2. Sec. 3.0. Maintenance and troubleshooting of field equipment and machinery and related lockout/tagout procedure is addressed in several of the provided Activity Hazard Analyses (Appendix D) but is not discussed in this section. Recommend including a section on Maintenance and troubleshooting of field equipment and machinery to include lockout/tagout procedures.
3. Sec. 3.2.18. Unless **CESPD Form 160-3** is the inspection checklist used, please add that **CESPD Form 160-3** will be used to document inspection.
4. Sec. 3.2.20. Excavation Bullets, Pg. 3-34, are a repeat of those listed in Sec. 3.2.19. Pages 3-31 and 3-32. Provided for information only.
5. Sec. 3.2.22. Recommend adding a barricade bullet, i.e.. Barricades will be placed around manholes.
6. Table 11-1 and Hospital Map. Correct spelling of Potrero Avenue.
7. Appendix B. Provide MSDSs for sealants, epoxy cement, and cement grout to be used.
8. Appendix C. Provide a copy of Underground and Overhead Utility Checklist, Hot Work Checklist, and Permit-Required Confined Spaces Checklist.
9. Appendix D. Various AHAs. Overhead power lines. Recommended controls section. For those that just say "See distances," recommend adding Table 3-5.
10. Installation/Removal of Sheet Pile AHA. Inspection Requirements for Heavy Equipment. Replace NAVFAC Form 5100/20 reference with **CESPD Form 160-3**. Heavy Equipment Checklist.
11. Demobilization AHA, Heat Stress, Recommended Controls. Change reference to Sec. 3.2.7.

To : Luann R Tetirick@Code 18@NAVFAC EFDWEST
Cc : Wayne Coffey@ROICC SFBAY@NAVFAC EFAWEST, Andrew K Uehisa@
ROICC SFBAY@NAVFAC EFAWEST
From : Mariano Perez@ROICC SFBAY@NAVFAC EFAWEST
Subject : 2151-0060 HPA GROUNDWATER PLUME, IR-1/21
Date : Thursday, August 1, 1996 at 8:06:17 pm EDT
Attachment : (none)
Certify : N

Luann

The following are my review comments on subject contract, delivery order #0060, Work Plan:

1. Paragraph 2.5, second sentence - spell out completely the word "decontamination".
2. Paragraph 3.2.2., last sentence of last paragraph (page 3-4) - the phrase "a new scope" should read "modifications to the original scope", unless the work on the sanitary and storm sewer lines is planned to be done under a separate delivery order.
3. Paragraph 5.6.3., at the end of first paragraph - state that the electric service will have enough capacity to supply the pumps electrical system in addition to the electrical service to the trailer.
4. Paragraphs 6.0 (last sentence) and 8.0 (last paragraph) - the scope of work calls for 45 calendar days not 2 months.

I will provide comments on the rest of the plans as soon as each one will be complete. I expect to complete the reviews on Friday 2 Aug 96.

To : Luann R Tetirick@Code 18@NAVFAC EFDWEST
Cc : Wayne Coffey@ROICC SFBAY@NAVFAC EFAWEST, Andrew K Uehisa@
ROICC SFBAY@NAVFAC EFAWEST
From : Mariano Perez@ROICC SFBAY@NAVFAC EFAWEST
Subject : 2151-0060 HPA IR-1/21 GROUNDWATER PLUME
Date : Friday, August 2, 1996 at 1:51:35 pm EDT
Attachment : (none)
Certify : N

Luann:

The following are my comments on subject contract, delivery order #0060, Environmental Protection Plan (Appendix A of the Work Plan):

1. On Section 4 of IT's plan, before the first paragraph, insert the following statements (or paragraph) in compliance with Section C, Part 4.0 of the basic contract:

- a. A general statement based on the requirements of paragraph 4.1.
- b. A statement based on the requirements of paragraph 4.2.
- c. A statement based on the requirements of paragraphs 4.5.1. through 4.5.3.
- d. A statement based on the requirements of paragraph 4.5.4.
- e. A statement based on the requirements of paragraphs 4.5.6 and 4.5.7.

2. Follow the above with the following statement:

"The contractor will carefully preserve and report immediately to the Contracting Officer the finding or discovery of any historical or archeological resources."

3. Follow the above with the following statement:

"The contractor will follow the applicable erosion and sediment control measures required by the basic contract."

4. Follow with the following statement:

"The disposal and control of hazardous waste will be accomplished following the procedures on the approved Work Plan and the Site Safety and Health Plan (SSHP)."

5. After the last paragraph, on page 4 of your plan, include a statement to meet the requirements of Section C, paragraphs 4.10 and 4.11 on dust control and noise respectively.

We recommend that IT Corporation make the above corrections to the Work Plan prior to any work commencing at the job site.

If you have any questions regarding these comments contact me at
510) 302-3369.

Mario M. Perez
Navy Technical Representative (NTR)



To : Luann R Tetirick@Code 18@NAVFAC EFDWEST
Cc : Wayne Coffey@ROICC SFBAY@NAVFAC EFAWEST, Andrew K Uehisa@
ROICC SFBAY@NAVFAC EFAWEST
From : Mariano Perez@ROICC SFBAY@NAVFAC EFAWEST
Subject : 2151-0060 HPA GROUND WATER PLUME
Date : Monday, August 5, 1996 at 6:14:37 pm EDT
Attachment : (none)
Certify : N

Luann:

The Site Safety and Health Plan (SSHP) for subject contract, Delivery Order #0060, has been reviewed and accepted for sufficiency upon revision of the following items:

1. Paragraph 3.1 - on first paragraph the word "piezometer" may have been used erroneously in place of "penetrometer". Revise accordingly.
2. Paragraph 3.2 - correct misspelled word "penztrometer" with "penetrometer".

The above revisions are in addition to the revisions forwarded by other reviewers from EFA WEST.

The contractor should make the revisions noted.

If you have any questions regarding the above contact me at (510) 302-3369 as soon as possible.

Mario M. Perez, NTR

COMMENTS FROM LUANN TETIRICK FOR

SITE IR 1/21 INDUSTRIAL LANDFILL GROUNDWATER PLUME

1. The title has changed from Hunters Point Annex to Hunter Point Shipyard. Please change all references to the new title.
2. Field work cannot begin until the Action Memorandum has been signed.

REVIEW COMMENTS FOR SITE IR 50

STORM DRAIN SYSTEM

31 July 96

MEMORANDUM

From: Code 09K:RE

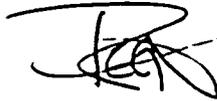
To: Code 1832.2 (William Radzevich)

Subj: REMEDIAL ACTION CONTRACT (RAC) N62474-93-D-2151, DELIVERY ORDER 0061, STORM DRAIN REMOVAL ACTION (1R-50), HUNTERS POINT ANNEX, CALIFORNIA, SITE-SPECIFIC HEALTH AND SAFETY PLAN REVIEW COMMENTS

Ref: (a) NAVFACINST 5100.11H, Sec. 5.13
(b) IT Corp. Site-Specific Health and Safety Plan, Revision B of July 96
(c) 29 CFR 1910.120 and 29 CFR 1926.65

Encl: (1) Safety Review Comments
(2) NAVFAC Form CSIR-1, Contractor Mishap Report

1. As required by reference (a), reference (b) has been reviewed for compliance with contract safety requirements and reference (c). I have also reviewed the environmental health comments provided by Mr. Gilbert Nickelson, Code 1825.3 Industrial Hygienist. Final acceptance of the HASP by this office is dependent upon IT Corporation review and consideration of comments provided.
2. Please request IT Corporation to review and consider the provided comments. Recommended changes should be clearly identified. This may be done in several ways: by submitting revised pages with reasons for the changes noted, by the use of strikeout and underline, by the use of shading and italics, or by cover letter stating how each comment has been addressed.
3. For clarification of the above items, please contact the undersigned at (415) 244-2955.



REGINA ENG

Copy to: 09K: Chron, Contract (w/c ref (b)), 1825GN, RE

Subj: REMEDIAL ACTION CONTRACT (RAC) N62474-93-D-2151, DELIVERY ORDER 0061, STORM DRAIN REMOVAL ACTION (1R-50), HUNTERS POINT ANNEX, CALIFORNIA. SITE-SPECIFIC HEALTH AND SAFETY PLAN REVIEW COMMENTS

1. Sec. 2.0 and Table 11-1. When known provide the ROICC names of Project Superintendent, Site Health and Safety Officer and his/her alternate, and update Table 11-1.
2. Sec. 3.2.2, Par. 1, Pg.3-2. Recommend changing "an active military base" to Hunters Point Annex (HPA). Par. 4, Pg. 3-3. Recommend changing "base" to HPA.
3. Sec. 3.2.8, Par. 1, Last Sentence, Pg. 3-10. Change "Alameda" to HPA.
4. Sec. 3.2.8, Bullet 3, Pg. 3-11. Correct HASP Section 12.3 reference. Section 12.3 is non-existent.
5. Sec. 3.2.11, Par. 3, Pg. 3-18. Change Section 12.6 reference to Table 11-1.
6. Sec. 3.0. Recommend adding a hazard analysis section for Video Logging of Storm Sewer Lines Inspection, and Set-up and Operation of Soil Filter Press Equipment.
7. Sec. 8.1.1, Par. 1, Pg. 8-1 and Sec. 8.1.2. Recommend adding a reference to Table 8-2 for locations to be monitored and for frequency requirements.
8. Sec. 8.1.1, Par. 2, Pg. 8-1. Required entry into manholes and waste water holding tanks is discussed in Sec. 3.2.8. Recommend rewording of first sentence to reflect.
9. Sec. 10.2, Par. 1, Last Sentence, Pg. 10-2. Change NAVFAC Form 5100/20 to NAVFAC Form CSIR-1. Form 5100/20 has been canceled and replaced with CSIR-1.
10. Sec. 10.2, Par. 1, Last Sentence, Pg. 10-3 Change Chapter 12.0 reference to Table 11-1.
11. Table 11-1 and Hospital Map. Correct spelling of Potrero Avenue.
12. Sec. 12. Contains Checklist of field equipment required and does not address record keeping and data management requirements.
13. Daily documentation of health and safety activities and other relevant site information, and accident reporting and investigating, other than first aid, is not addressed in the HASP.

L. Work Activity Involved at Time of Accident	M. Personal Protective Equipment? (1) Available & used <input type="checkbox"/> (2) Not required <input type="checkbox"/> (3) Available & not used <input type="checkbox"/> (4) Not related to mishap <input type="checkbox"/> (5) Wrong PPE for job <input type="checkbox"/> (6) List type(s) used:
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5. Injury/Illness/Fatality Information:

A. Severity of Illness/Injury	B. Estimated Days Lost	C. Estimated Days Hospitalized	D. Estimated Days Restricted Duty
E. List Body Part(s) Effected	F. Nature of Illness/Injury	G. Type and Source of Injury/Illness (1) Type: (2) Source:	

6. A. Accident Description (Describe in your own words) (Use additional paper, if necessary):

B. Who provided first aid and/or cleanup of mishap site?

C. Any blood borne pathogen exposure by other than EMTs? If so who?

D. Was site secured and witness statements taken immediately?

E. List OSHA and EM-385-1-1 standards that were violated?

7. Casual Factors (Explain yes answers on supplementary sheet)	Yes	No
Design - Was design of facility, workplace or equipment a factor?	<input type="checkbox"/>	<input type="checkbox"/>
Inspection/Maintenance - Were inspection & maintenance procedures a factor?	<input type="checkbox"/>	<input type="checkbox"/>
Persons Physical Condition - In your opinion, was the physical condition of the person a factor?	<input type="checkbox"/>	<input type="checkbox"/>
Operating Procedures - Were operating procedures a factor?	<input type="checkbox"/>	<input type="checkbox"/>
Job Practices - Were any job safety/health practices not followed when the accident occurred?	<input type="checkbox"/>	<input type="checkbox"/>
Human Factors - Did any human factors such as size or strength of person, etc., contribute to accident?	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No
Environmental Factors - Did heat, cold, dust, sun, glare, etc., contribute to the accident?	<input type="checkbox"/>	<input type="checkbox"/>
Chemical & Physical Agent Factors - Did exposure to chemical agents, such as dust, fumes, mists, vapors or physical agents such as noise, radiation, etc., contribute to the accident?	<input type="checkbox"/>	<input type="checkbox"/>
Office Factors - Did office setting such as lifting office furniture, carrying, stopping, etc., contribute to the accident?	<input type="checkbox"/>	<input type="checkbox"/>
Support Factors - Were inappropriate tools/resources provided to properly perform the activity task?	<input type="checkbox"/>	<input type="checkbox"/>
Personal Protective Equipment - Did the improper selection use, or maintenance of personal protective equipment contribute to the accident?	<input type="checkbox"/>	<input type="checkbox"/>
Drugs/Alcohol - In your opinion, was drugs or alcohol a factor?	<input type="checkbox"/>	<input type="checkbox"/>
Job Hazard Analysis - Was the lack of an adequate (IAW EM-385-1-1 Sec 01.A) activity hazard analysis a contributing factor? - Was it site specific and addressed the type of work/operations performed when the mishap occurred?	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Management - Did a lack of adequate supervision contribute to the accident? - Was inadequate information provided at pre-con meeting?	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
8. Training:		
A. Was person trained to perform activity/task?	<input type="checkbox"/>	<input type="checkbox"/>
B. Type of training?		
C. Date of most recent formal training? / /	D. List topics discussed	
9. Fully Explain What Allowed Or Caused The Accident, Include Direct And Indirect Causes:		
A. Direct Cause		
B. Indirect Cause		
C. Action(s) taken to prevent occurrences or provide on-going corrective actions.		

D. Corrective Action Dates	
(1) Beginning (Mo/Da/Yr) / /	(2) Anticipated Completion (Mo/Da/Yr) / /

10. OSHA:

A. Date OSHA Was Notified: / /	C. Date of OSHA Citation: / / (Include cy of citation)
B. Date OSHA Investigated: / /	D. \$ Amount of Penalties: \$ _____

11. Report Preparer

Print Name & Title of Supervisor Completing Report

Signature: _____ Date (Mo/Da/Yr) _____

12. Management Review (Contracting Officer)

A. <input type="checkbox"/> Accepted	B. <input type="checkbox"/> Amendments Required	C. <input type="checkbox"/> Comments (include program improvements required for your command, NAVFACHQ construction safety program, and EM-385-1-1)
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D. Print Name & Title of Official Completing Report

Signature: _____ Date (Mo/Da/Yr) _____

13. Safety And Occupational Health Office Review

A. <input type="checkbox"/> Concur	B. <input type="checkbox"/> Non Concur	C. <input type="checkbox"/> Additional Actions/Comments
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D. Print Name & Title of Safety Personnel Reviewing

Signature: _____ Date (Mo/Da/Yr) _____

ENCLOSURE 3

FEDERAL FACILITY AGREEMENT

DATED 26 FEBRUARY 1992

THIS RECORD IS ENTERED IN THE DATABASE AND FILED
AS

RECORD NO. AR_N00217_002534