

CAMPAIGN AGAINST MILITARY POLLUTION

A partnership between Arc Ecology, San Francisco BayKeeper and affected communities created to halt the Military's pollution of San Francisco Bay

December 22, 1996

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
(Attn.: Mr. Richard Powell, Code 1832)
900 Commodore Drive
San Bruno, CA 94066-5006

RE: Comments on the Hunters Point Parcel B Proposed Plan, Draft Final, dated October 16, 1996

Dear Mr. Powell:

This letter addresses our concerns regarding the Proposed Plan for Parcel B at Hunters Point Shipyard. After reviewing this document, CAMP has grave concerns regarding the Navy's assumption that a cap will be part of an appropriate remedy for the industrial landfill at Parcel E. For various reasons, outlined in this letter, CAMP questions whether this landfill will qualify for EPA's presumed remedy of a cap. We ask that the Navy craft and evaluate all remedial actions at the Shipyard, including those on Parcel B, such that the Parcel E landfill is not relied upon as part of a proposed remedy until such time as an agency-approved decision has been made regarding remediation of the industrial landfill site.

According to Navy documents, the 36-acre industrial landfill at Parcel E was created between 1942 and 1974 by filling a wide slough of the San Francisco Bay with industrial and solid wastes. The Initial Assessment Study (1984) estimated that "over 1 million cubic yards of solid waste, 21,000 gallons of liquid chemical waste, 500 cubic yards of asbestos, 6000 pounds of fluorescent radium dials and knobs from ships, were disposed of over the 16 years the landfill was open." Other materials specifically reported to be deposited in the landfill include paints, solvents, and sandblast waste. In 1975 the landfill was closed, capped and landscaped with natural grasses. Soon thereafter, the Navy unsuccessfully tried to stop contaminated leachate flowing from the capped landfill into the Bay. Furthermore, Triple A Machine Shop, who leased the Shipyard from 1976 until 1986, reportedly stored drums (which leaked and stained the ground surface) and disposed of sandblast waste in the area of the landfill. Recently, documentation prepared to support a removal action at the Parcel E landfill concluded that the entire debris zone should be considered a source for contaminated groundwater discharging into the Bay. Furthermore,

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the Navy reported that the debris zone is located below the water table, and therefore, that it is saturated.

Since 1975, the Navy has unsuccessfully tried to stop the flow of leachate from the landfill into the Bay. This indicates that water flows into the landfill, under the existing cap, from upland areas of Parcel A. Water also moves in and out of the debris zone via the tides. This situation seems entirely predictable given that the landfill was created by filling a slough. Under these conditions, it seems highly unlikely that additional capping will stop the flow of contaminated leachate from the Parcel E landfill into the Bay.

In 1996, the Navy planned a removal action to contain leachate emanating from the Parcel E landfill. This temporary measure would involve driving sheet piling into the Bay shoreline which would cause contaminated leachate to stack up behind the wall, where it could be pumped out and disposed of off-site. If, however, a cap becomes part of a remedial action for the Parcel E landfill then the sheet piling and groundwater extraction would become part of a permanent remedy. This is unacceptable. Not only would it saddle the Navy with a long-term obligation to pump contaminated groundwater, but also create a very unstable situation in the likely event of an earthquake.

CAMP fears that even temporarily storing cleaned soils from base remedial actions at the Parcel E landfill will set the stage for selecting a cap as the remedial action for the Parcel E industrial landfill. After all, the sheet piling and extraction wells will already be installed and the cap foundation in place. At the very least, placing cleaned soils at the Parcel E landfill potentially will increase costs to remediate if capping is *not* selected as the remedial action. CAMP urges the Navy to place cleaned soils from Parcel B at a different site, or dispose of it off-site at an approved landfill. Over the long run, given what is known about the contents of and the hydrodynamics in the area of the Parcel E industrial landfill, CAMP urges the Navy to plan on removing contaminated landfill debris and affected soils rather than to try to contain and pump contaminated leachate.

Respectfully Submitted,


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San Francisco Baykeeper


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