

5090
Ser 1832.4/L7051
12 Dec 1996

Mr. Daniel W. Baden
International Technology Corporation
4585 Pacheco Boulevard
Martinez, CA 94553

Dear Mr. Baden:

This letter forwards the Navy's comments on various draft plans submitted for the removal action at Site IR 03. Waste Oil Reclamation Ponds (Delivery Order 62) at the Hunters Point Shipyard.

The draft Removal Action Work 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 enclosure (1) are considered and incorporated as appropriate into the subject documents. The Navy recommends that International Technology Corporation make appropriate corrections prior to any work commencing at the job site.

If you have any questions regarding this enclosure, please contact Ms. Luann Tetirick, Code 1832.4, at (415) 244-2561, at FAX (415) 244-2654.

Sincerely,

Original signed by:

RICHARD E. POWELL
Lead Remedial Project Manager
By direction of
the Commanding Officer

Encl: (1) Review Comments for Site IR 03, Waste Oil Reclamation

Copy to:
ROICC San Francisco Bay Area (Attn: Wayne Coffey)

Blind copies to:
183, 1832, 1832.4, 62.3
09CMN, 09CRG, HPS CSO 62C (Eddie Sarmiento)
Information Repository (3 copies, w/encl)
Chron, Green
Activity File: NAS Alameda (File: LL7051LT.DOC) ab

REVIEW COMMENTS FOR SITE IR 03, WASTE OIL RECLAMATION PONDS

Comments from Luann Tetrick:

REMOVAL ACTION WORK PLAN:

1. Page 1-2, Section 1.3, second line down. Change: "impacts resulting from the transport" to "impacts resulting from the potential transport".
2. Page 1-3, fourth line down. Change: "intended to reduce migration" to "intended to reduce potential migration".
3. Last page, figure 5, prepare plans section. The date listed for prepare plans is earlier than actual submission of the draft project plans (Revision B). This changes some of the dates for activities following submission of the draft project plans. Figure 5 needs to be updated to match current plans.
4. Page 5-3, Hydroseeding: Seeding is required for this project. This section should be revised to reflect this.

SAMPLING AND ANALYSIS PLAN

5. Page 3, section 2.0. The sampling analysis plan is being reviewed to develop a mix of TPH and TOG samples. This plan will need to be updated to include TOG sampling when the proposed mix of TPH and TOG samples is approved by the Navy.

COMMENTS ON LEVINE FRICKE RECON COMMENTS

6. Encountering Refusal during CPT and Geoprobe Investigations: The Removal Action Work Plan for CPT and Geoprobe investigations is considered adequate.
7. TPH Analyses: See comment 4 for the TOG and TPH analyses comments.

11 Dec 96

MEMORANDUM

From: Code 09K:RE
To: Code 1832.4 (Luann R. Tetirick)

Subj: REMEDIAL ACTION CONTRACT (RAC) N62474-93-D-2151, DELIVERY
ORDER 0062, SITE 1R-03 WASTE OIL RECLAMATION PONDS,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA, SITE-
SPECIFIC HEALTH AND SAFETY PLAN REVIEW COMMENTS

Ref: (a) EFAWEST 1832.4 E-Mail of 25 Nov 96
(b) IT Corp. Site-Specific Health and Safety Plan, Revision B of Nov 96
w/Workplan
(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). Final acceptance of the SSHP by this office is dependent upon IT Corporation review and consideration of the comments provided by this office and Mr. Gilbert Nickelson, Code 1825.3 Industrial Hygienist.
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 0062, SITE 1R-03 WASTE OIL RECLAMATION PONDS, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CA, SITE-SPECIFIC HEALTH AND SAFETY PLAN REVIEW COMMENTS

1. Sec. 2.4 and 2.5. **When known, provide the ROICC the name of the alternate Project Superintendent and Site Health and Safety Officer.**
2. Sec. 3.2.22 and/or 3.2.24. Recommend adding a barricade bullet, i.e., Barricades will be placed around sewer manholes.
3. Sec. 3. Pile driving and sheet piling installation operations are discussed in Work plan, Section 4.3, Pg. 4-1 and Sec. 5.1, Pg. 5-1 but not specifically within the SSHP. Recommend inclusion.
4. The work plan mentions no field work involvement with the HPS sewer system. Potential entry is addressed in SSHP, Sec. 3.2.14 and 3.2.24.
5. Tables 3-1 and 3-2 list asbestos as a chemical of concern with MSDSs provided at Appendix B. Potential contact, exposure (i.e., work activity, location) and precautions are not discussed within SSHP, Sec. 3. or the Work plan.
6. Section 5.1, Par. 1 and 2, Pg. 5-1. The level(s) of project activities PPE needs to be fill in as discussed in the Work plan, Sec. 2.1.1, Pg. 2-3.
7. Section 5.3.2, Pg. 5-5. Recommend cross referencing Sec. 3.2.24 for decontamination procedures for PPE used during sewer entry.

SSHP Administrative/typographical. Recommend the following corrections or changes.

1. List of Tables, Pg. viii. Emergency Phone Numbers are found at Table 12-1 in this SSHP not 11-1.
2. References, Pg. 1-3, Please change the USACE EM 385-1-1 date to September 1996. Please change date on the master boilerplate. Latest publication is 3 Sep 96.
3. Sec. 3.2.18, Pg. 3-29, Sec. 12.1. and other Fire Prevention and Protection sections. Recommend consistency as to the naming of the supporting Fire Department. Hunters Point Shipyard, HPS, Base or facility are used interchangeably within SHSP to name.
4. Sec. 6.4, Last sentence, Pg. 6-2. Change Section 11 to Section 12.
5. Table 12-1 and/ or Hospital Map. Recommend including route directions and highlighting route to hospital.
6. Installation and Removal of Sheet Pile AHA. Pg. 5 of 5. Change NAVFAC form 5100/20 to CESPDP 150-R.

To : Luann R Tetirick@Code 18@NAVFAC EFDWEST
Cc : John Anderle@ROICC SFBAY@NAVFAC EFAWEST, Wayne Coffey@ROICC SFBAY@
NAVFAC EFAWEST, Andrew K Uehisa@ROICC SFBAY@NAVFAC EFAWEST
From : Mariano Perez@ROICC SFBAY@NAVFAC EFAWEST
Subject : 2151-0062 HPA OIL PONDS, SSHP PLAN
Date : Friday, December 6, 1996 at 12:28:21 pm PST
Attachment : (none)
Certify : N

Luann

The Site Safety and Health Plan (SSHP) for subject contract, Delivery Order #0062 Removal Action at Site IR-03 Waste Oil Reclamation Ponds, has been reviewed and accepted for sufficiency upon revision of the following items:

1. Provide Table 8-1 Action Levels.
2. Provide Table 8-2 Air Monitoring Frequency and Locations.

The above tables were inadvertently left out of Section 8.0.

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.

Thanks.

Mario M. Perez, NTR

To : Luann R Tetirick@Code 18@NAVFAC EFDWEST
Cc : John Anderle@ROICC SFBAY@NAVFAC EFAWEST, Andrew K Uehisa@
ROICC SFBAY@NAVFAC EFAWEST
From : Mariano Perez@ROICC SFBAY@NAVFAC EFAWEST
Subject : 2151-0062 HPA OIL PONDS, PLANS
Date : Thursday, December 5, 1996 at 4:45:29 pm PST
Attachment : (none)
Certify : N

Luann

The Work, CQC, Environmental Protection, and Sampling and Analysis Plans were reviewed with the following comments:

-WORK PLAN

No comments. Recommend approval for constructibility purposes.

-C PLAN

No comments are provided. I will prepare letter of approval.

-ENVIRONMENTAL PROTECTION PLAN

No comments are provided. Plan is acceptable.

-SAMPLING AND ANALYSIS PLAN

No comments are provided. Plan is acceptable.

-SITE SAFETY AND HEALTH PLAN

I will review this plan tomorrow, December 6, and will provide comments, if necessary, as soon as the review is completed.

Thanks.

Mario M. Perez/NTR

December 3, 1996

5105.00-006

Ms. Luann Tetirick
Department of the Navy - EFA West
Naval Facilities Engineering Command
900 Commodore Drive, Building 208
San Bruno, California 94066-2402

Subject: Technical Comments
Remedial Action Contractor's Work Plan
IR-03 Removal Action, Delivery Order 62
Hunters Point Shipyard, San Francisco, California

Dear Luann:

This letter provides Levine-Fricke-Recon's (LFR's) technical review comments to the Remedial Action Contractors (RAC) Work Plan for the IR-03 Removal Action dated November 25, 1996. Based on our review of the work plan, LFR suggests that the following items be considered.

Underground Utilities

We suggest that the tentatively identified storm drain and fuel line be verified in the Phase I work and considered in the future design of the wall. The RAC should consider a slurry wall or appropriate composite section if the Navy does not want to disturb these lines.

At Parcels B and D, the Navy has proposed a cutoff collar or similar method to eliminate groundwater from traveling along the storm drainpipe bedding into the Bay. The RAC should consider this as an alternative. At a minimum, the RAC should ensure that floating product does not travel along this pathway during this Removal Action.

Encountering Refusal during CPT and Geoprobe Investigations

The wall alignment will be influenced by confirming a path clear of obstructions. If significant obstructions are found, the addition of non-standard Z-type sheet piles may be needed. The intent of the Phase I actions and details regarding the step-out logic was presented in Chapter 3.0, Tasks 1 and 2 of the Remedial Action Implementation Work Plan (RAIWP). The original intent of the investigation was to use a mobile laboratory to analyze the Geoprobe samples to confirm the hydrocarbon-affected area, define an alignment clear of obstructions, and locate the Bay Mud contact. The mobile laboratory would allow quick turnaround time on the Geoprobe sample analyses, thus potentially pulling the wall alignment inland. This would allow more distance between the existing protected shoreline and the proposed wall alignment, and reduce the

probability of encountering subsurface obstructions. Once this alignment is determined, cone penetration testing (CPT) will further identify the Bay Mud contact, and better confirm that obstacles are not present between the Geoprobe locations. Given that the RAC prefers to perform the CPT first, we recommend that the intent of the Phase I actions and the step-out logic be described in more detail.

TPH Analyses

The EE/CA and RAIWP use total oil and grease (TOG) analyte as the indicator compound for the extent of waste oil contamination. LFR suggests that TPH extractable (modified EPA Test Method 8015) and TOG (EPA Test Method 9071) analytical methods be used to ensure consistency with the existing soil data (refer to Appendix B of the EE/CA in the Final Action Memo dated October 18, 1996). TPH extractable should be reported both as the diesel range and as the oil range.

Sheet Pile Wall Design Considerations

Considerations should be given to installing a Waterloo Barrier type sheet pile wall. This would allow for long-term containment should a containment and capping alternative for IR-03 be the preferred alternative once the Feasibility Study at Parcel E is complete. Additionally, the Phase I field work and wall design should address the wall acting as a retaining wall in the future if the waste oil ponds are excavated to a total excavation depth up to 25 feet below ground surface (bgs). This may include extending the wall to an approximate depth of 40 feet bgs in the central wall area. The Phase I work should verify that Bay Mud extends well below 50 feet bgs.

We appreciate the opportunity to work with the Navy, PRC, and the RAC. Should you have any questions, please contact me or Michael Glaser at (510) 652-4500.

Sincerely,



Daniel R. Fitzgerald, P.E.
Senior Engineer

cc: Patrick Wooliever, PRC-EMI
Dan Baden, IT Corporation