

N00217.003733
HUNTERS POINT
SSIC NO. 5090.3

McClelland

FIVE PAGES

From Valerie
Heusinkveld

Ca/EPA

Department of
Toxic Substances
Control

April 30, 1998

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Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Michael McClelland, Code 1832
900 Commodore Drive
San Bruno, California 94066-2402

**COMMENTS ON DRAFT FEASIBILITY STUDY REPORT FOR
PARCEL E, HUNTERS POINT SHIPYARD, SAN FRANCISCO,
CALIFORNIA**

Dear Mr. McClelland:

The Department of Toxic Substances Control has reviewed the draft Feasibility Study report dated Jan. 15, 1998 for Parcel E. The enclosed comments supplement the comments which were transmitted to you on March 31, 1998. Comments from the San Francisco Bay Regional Water Quality Control Board will follow soon.

We understand that the Navy will reissue the draft Feasibility Study after the Validation Study is concluded later this year. We certainly intend to provide you with comments on the reissued draft Feasibility Study report, but these comments are intended to help you revise the current document.

If you have any questions, please call me at
(510)540-3844.

Sincerely,

Valerie Heusinkveld

Valerie Heusinkveld
Hazardous Substances Scientist
Office of Military Facilities

enclosure

cc: see next page

Mr. Michael McClelland

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cc: Ms. Claire Trombadore (SFD-8-2)
U. S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105-3901

Mr. David Leland
California Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, California 94612

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Comments on Parcel E Draft Feasibility Study

GENERAL COMMENTS

1. The Navy has stated that it will remediate HPS to be compatible with the Reuse Plan. Some of the alternatives in the Feasibility Study are incompatible with the Proposed Reuse Plan as described in the draft EIS/EIR dated November 1997. The time interval provided by the Validation Study provides the Navy with two opportunities: revise the alternatives to make them compatible with the Proposed Reuse Plan, or to talk with the City of San Francisco about altering the Reuse Plan. If neither of these comes about, the Navy must state in the discussion of the nine NCP criteria which of the alternatives are incompatible with planned reuses.
2. Designating a CAMU is a rigorous process. The Feasibility Study should more accurately reflect the regulations and policies governing CAMU designation, for instance in page 3-48, et seq., page 4-31, et seq., and page 4-50, et seq. Before revising these sections, please carefully review CFR 264.552/22 CCR 66264.552, especially subsection (e), and the Federal Register for Tuesday, February 16, 1993 (Vol. 58, No.29, p. 8658, et seq.). In light of these requirements, please recalculate the cost estimates.
3. In Chapter 4, discussions of treatment technologies for water and saturated soils should specify whether the technology has been demonstrated for high-TDS media.

SPECIFIC COMMENTS

Page 3.3, Section 3.1.1.1. Two of the three cleanup scenarios use 10^{-5} as the target risk level. The previous page points out that 10^{-6} is the point of departure. How did the Navy reach 10^{-5} ?

Waste classification and Land Disposal Restrictions (p. 3-48 para. 2; p.3-49 para. 1; p. 3-50 "Offsite Class I Landfill;" p. 4-27, p.4-37 para. 4, p. 4-60 top of page).

These sections are unclear as to Land Disposal Restrictions and applicability to the project's remedial waste. An improvement would be to replace it with language similar to the Final Record of Decision for Parcel B, which is reasonably clear when it states that excavated soil and groundwater will be evaluated in accordance with 22

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CCR Section 66268.7(a) to determine whether they are subject to Land Disposal Restrictions. California-regulated hazardous wastes are not currently subject to LDRs; therefore the California classification procedures TTLC and STLC are not pertinent to LDRs.

Section 4.3. Description of Remedial Unit Alternatives. Please provide engineering studies of the efficacy of sheetpile walls in preventing contamination from migrating. If performance data is available for the sheetpile walls that already exist at HPS, please provide it.

The environmental protectiveness of the remedy at Parcel E will depend on the efficacy of the vertical barrier between the landfill at IR-01/21 and the Bay, as well as between the landfill at IR-02 and the Bay. RCRA classifies liquids that have percolated through land disposed wastes as leachate, a listed hazardous waste. Effective containment will be crucial in protecting public health and the environment, and the sheetpile wall will be an important part of that containment (depending on the alternative selected). Please provide any information available on performance or proposed operation of trenches, composition of the leachate, expected interaction of trenches with the Bay water, and any other related topics.

Sec 4.3.1.2: Alternative 2. Separate Source Containment.; also p. 4-20 "Multilayer Capping," p. 4-24 "Multilayer Capping," p. 5-6, p.5-22.

As page 5-9 notes, landfill cover requirements for Title 22 Chapter 14 are found in Section 66264.228, subsections (e) through (r) (see 66264.310 (a)(7)). Please revise the text and the cost estimate to reflect current standards for implementing this section. An example of a cap for a site on Bay Mud that might comply with Chapter 14 is:

- 24 inches of foundation layer
- 24 inches of clay attaining hydraulic permeability no greater than 10^{-7} cm/sec
- 60 ml HDPE
- Drainage layer
- 18 inches of topsoil for vegetative layer.

Page 4-21, last para. Please consider deleting the names of specific waste management facilities for recovered LNAPLs and referring simply to "authorized waste management facilities." If the Navy prefers to mention specific facilities, then

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it should confirm the status of the businesses mentioned.

Page 4-34, page 4-53 "Implementability." These pages state, "... there may be community resistance to designating a CAMU at the IR-01/21 and IR-02 Northwest debris zones." It would be more accurate to state that the community might resist a decision to bring remedial waste to IR-01/21 and IR-02 Northwest.

Page 4-45 "Single -Layer Capping." The draft FS is not clear as to the purpose of the single-layer cap. The purpose depends largely on the types of contaminated soils being capped. Some possible types are: 1) soil that would present a hazard if contacted or ingested; in this case the purpose is to contain the soil; 2) soil that would release contaminants to water; in this case the purpose is to prevent water infiltration; or 3) the soil resembles hazardous waste, in which case a single-layer cap is not adequately protective. There are many potential purposes of a cap; in order to analyze the cap's effectiveness, the draft FS should specify the intention at Parcel E.

Also, if a single cap will abut a multilayer cap, the FS should discuss design and operation conditions of the interface that will prevent the two caps from interfering with each others' functioning. Cost estimates should reflect the construction and operation of the interface.

Page 4-70, top para. What is the expected life of sheetpile walls treated with corrosion-resistant chemicals, then exposed to the conditions at Parcel E? How will the corrosion-resistant coatings be affected by being driven into the ground?

Recent discussions have indicated that an alternative technology to prevent corrosion might be the use of sacrificial cathodes, and that sheetpile walls might be expected to last for 30 years under these conditions. If this is the case, then the FS should discuss the methods that would be used to monitor the integrity of the sheetpile walls, and the options for repairing and eventually replacing the sheetpile walls.