STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
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September 28, 1992

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TREASURE ISLAND
SSIC NO. 5090.3.A

Commanding Officer
Western Division
Attn: Mr. Ernesto Galang, Code 1813
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-0720

Dear Mr. Galang:

INVESTIGATION-DERIVED WASTE MANAGEMENT PLAN FOR RI/FS, NAVAL STATION TREASURE ISLAND

The staff of the Department of Toxic Substances Control (Department) and the San Francisco Bay Regional Water Quality Control Board (SFRWQCB) has completed its review of the draft Investigation-Derived Waste Management Plan (IDWMP) dated August 18, 1992 for Naval Supply Center Treasure Island. The following comments should be incorporated into the final IDWMP. The first set of comments presented here are those of the Department. The second set of comments have been provided by the SFRWQCB.

Comments of the Department of Toxic Substances Control

SECTION 2.2 IDW STORAGE.

1. Page 2-4, first paragraph:

Clarification is needed for the last two sentences in the paragraph. Drums should be secured with lids as soon as they are filled or at the completion of field activities at a site.

2. Page 2-4, second paragraph:

The application California Code of Regulations, Title 22 on the management of IDW has not been negotiated with the Department of Toxic Substances Control. Management of IDW should comply with the final IDWMP and applicable portions of Title 22. Applicable portions of CCR, Title 22 include Chapter 12, Standards Applicable to Generators of Hazardous Waste, Chapter 11, Identification and Listing of Hazardous Waste, and Chapter 15, Land Disposal Restrictions. Once IDW is determined to be a hazardous waste Title 22 requirements apply. Prior to determining if the waste is a hazardous waste the containers should be labeled as defined in Section 2.3 of the IDWMP. All IDW should be stored closed and in a central, secure (fenced and locked) area.

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SECTION 3.1 IDW CHARACTERIZATION

3. Page 3-2, last paragraph:

The characterization of IDW as detailed in the Waste Management Plan in not consistent with CFR, 40, Part 261, or with CCR, Title 22, Chapter 11 and not acceptable to the Department. The IDWMP must be rewritten to be consistent with CFR 40 and CCR, Title 22.

The first step in characterizing waste is to determine if the waste contains any listed RCRA or California hazardous waste. If the waste contains a listed hazardous waste the waste is considered hazardous. Further, if the soil contains a listed RCRA waste, it will always be a hazardous waste, even after treatment. If purge water contains a listed hazardous waste, it must meet treatment standards prior to disposal.

The second step in characterizing waste is to determine if the waste exhibits hazardous characteristics. The characteristic of toxicity may be the most applicable characteristic for IDW; however, other characteristics need to be considered.

4. Page 3-3, first paragraph:

The IDWMP states that as a result of the testing procedures for the TCLP and STLC, analyte concentrations measure in environmental samples cannot be compared directly to TCLP and STLC results. Environmental samples could, however, be compared with California's Total Threshold Limit Concentrations (TTLC). Comparison of the environmental samples to the TTLC should be conducted before any comparison to the STLC or TCLP. Analysis for STLC must be conducted if the total concentration exceeds the STLC value by ten times.

5. Page 3-3, last paragraph:

The third step described in the IDWMP calls for the testing of the containerized IDW if the quantitative review of data suggests that sample concentration could exceed appropriate regulatory thresholds. Why is there a question of whether a samples concentration exceeds appropriate regulatory thresholds, if they could be directly compared to the TTLC? What would occur if the containerized sample concentrations do not exceed regulatory thresholds, when the environmental samples do?

If concentrations of contaminants present in the sample are greater than regulatory thresholds (TTLC), the IDW should be considered hazardous. If concentration of contaminants present in the sample are lower than regulatory thresholds, the IDW should be considered non-hazardous.

SECTION 3.2 MANAGEMENT OF INVESTIGATION-DERIVED SOILS

6. Page 3-4, Section 3.2.2 Analyses:

Before spreading "non-hazardous" soil cuttings at or near the boring or source area, the level of contamination should be considered. Although soil cuttings may not be classified as a Hazardous Waste they may still be contaminated. Spreading contaminated soil at the site could potentially cause a health risk. Background levels should be established to determine what constitutes contamination. Contaminated soil should not be returned to a site before a risk assessment determines that the levels of contamination pose no health or environmental risk. Without this information Navy may cross contaminate clean soil at the surface. These comments also apply to the application of IDW aqueous liquids.

SECTION 3.5 DISPOSAL OF WASTE ON-SITE WITHIN AN AREA OF CONTAMINATION (AOC)

7. Page 3-7, last paragraph:

Returning hazardous IDW to the AOC for placement is considered disposal by the Department and shall not occur on Treasure Island. Once the hazardous IDW leaves the AOC RCRA treatment, storage, and disposal requirements apply.

<u>Comments from the San Francisco Bay Regional Water Quality Control Board</u>

1. In addition to the California Hazardous Waste Regulations -- Title 22 of the California Code of Regulations, cited in Section 1.2 of the Appendix, the Waste Management Plan should also outline procedures to comply with siting, construction and monitoring requirements specified in Chapter 15, Article 3, Title 23 of the California Code of Regulations, if creation of a waste management unit for soil treatment or disposal is to be considered (Appendix B: Identification of Applicable or Relevant and Appropriate Requirements; Figures 29, 30, 31).

2. Handling and storage of Investigation Derived Waste (IDW) must consider potential threats to the environment, including groundwater and surface water quality, in addition to the precautions used to protect human health (Appendix B).

3. Please describe the exact procedures for returning soil to the trenches and state how many soil samples will be required to adequately characterize the excavated soil, instead of merely referring to EPA guidance documents (p. A-2). Since "the total number of drums that will require sampling is not known at this time" (p. A-2), a table showing the ranges of sample numbers for numbers of drums of soil cuttings should be presented (e.g., 1 to 10 samples for 1 to 5 drums).

4. Backfilling the soil into the trenches or test pits from which it was originally excavated is appropriate if doing so will not pose and incremental risk to human health and the environment and the final remedial actions will address any risk posed by the wastes. Specifically, soil that is excavated should be separated by depths (for example, by one foot intervals). During backfilling, the soil should be placed back into the trench or test pit in the order of the depths from which it was removed. This approach will prevent vertical cross contamination, for example, in situations where contaminated surface soil is replaced into the trench or test pit at depths where soil contamination had not previously existed (p. 2-2). The surface of the excavated area should be restored to its original condition to prevent soil erosion.

5. Results from environmental samples of IDW should be compared first with TTLC values. If TTLC values are exceeded, then the waste is considered hazardous. If the results from the environmental samples are lower than TTLC, but higher than 10 times the STLC or 20 times the Toxicity Characteristic Leaching Procedure (TCLP) action levels, the IDW is still considered hazardous until the Waste Extraction Test (WET) or TCLP is performed to prove otherwise (Section 3.1).

For compounds that have different TCLP action levels and STLC values, always use the lower value to determine whether or not the waste is hazardous. For compounds that have the same TCLP action levels and STLC values, always use the STLC value to determine whether or not the waste is hazardous because the WET procedures involve a ten-times instead of a twenty-times dilution factor and are, therefore, more stringent than the TCLP action levels. A

good example is presented on page 3-3. Soil that contains 2 mg/kg of mercury (one-half of what was provided in the example on p. 3-3), would have been considered hazardous if the concentration was compared with the STLC value. The concentration of 2 mg/kg is ten times the STLC value (0.2) for mercury.

6. Substantive NPDES requirements must be met for discharge of treated IDW liquids off-site (p. 3-6). Such permits may be obtained through the SFRWQCB.

7. The pretreatment discharge limits for the Treasure Island treatment plant and the San Francisco Sanitation District or other proposed POTW(s) should be presented in the document. Some sanitation districts do not accept well-development or purge water. A copy of the appropriate authorizations should be included in the waste management plan because the decision to accept IDW liquids rests with the Treasure Island wastewater treatment plant or with the sanitation district to which the waste is to be disposed.

If you have any questions regarding these comments on the IDWMP, please call me at (510) 540-3809.

Sincerely,

Thomas P. Lanphar

Thomas P. Lanphar
Associate Hazardous Materials Specialist
Site Mitigation Branch

cc: Ms. Barbara Smith
San Francisco Bay
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

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