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SEP 14 1987

17 DEC 1987

State of California
California Regional Water Quality
Control Board
San Francisco Bay Region
1111 Jackson Street, Room 6040
Oakland, CA 94607

Dear Mr. James:

Enclosed is our evaluation of the structural characteristics of the pickling and plate yard emergency containment structure at Naval Station Treasure Island, Hunters Point Annex, San Francisco, as requested by Ms. L. Tang in the Industrial Division of your office. This facility has been inactive since the mid-70's and the dipping tanks inside the emergency containment structure are un-filled. Approximately two to three feet of liquid remain in the containment structure, apparently from direct rainfall. The free standing dipping tanks inside the concrete containment structure are not toxic pits by Toxic Pit Cleanup Act (TPCA) criteria. The concrete emergency containment structure was designed to hold emergency releases from the dipping tanks. Under emergency conditions, the containment structure would maintain its integrity while free-standing and should be exempt from the TPCA criteria.

Additionally, to address your concerns about possible past contaminant releases to the environment from this facility, we are currently developing a Remedial Investigation and Feasibility Study (RI/FS) program in cooperation with the Toxic Cleanup Division of your office, the Department of Health Services, and the U.S. Environmental Protection Agency. The objectives of these investigations are to thoroughly characterize the hydrogeology, the vertical and horizontal extent of contamination, and to evaluate the feasibility of possible remedial actions at this and other sites at Hunters Point Annex. We are also proposing to implement removal actions at this and other sites at Hunters Point Annex consistent with the RI/FS program. As the lead federal agency for the RI/FS at Hunters Point Annex, we are required to perform remedial investigations and removal actions consistent with the National Contingency Plan and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986.

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REPRODUCED AT GOVERNMENT EXPENSE

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REPRODUCED AT GOVERNMENT EXPENSE

The RI/FS program for the pickling and plate yard will address the environmental issues at this site. Application of the TPCA regulations at an emergency containment structure would create redundant effort which would not improve upon the CERCLA/SARA process we are committed to. We hope that you will agree with our conclusions that the emergency containment structure is exempt from TPCA requirements and that you will support us in our RI/FS investigations to find effective final remedial measures for this site in a timely manner.

If, in your final evaluation, the pickling and plate yard emergency containment structure is a toxic pit regulated under the TPCA, any specific requirements (especially compliance schedules) to be imposed should be consistent with the RI/FS program. We are available to meet with you and your staff to discuss this subject in order to define a course of action consistent with our CERCLA/SARA investigations.

Should you have any questions, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Mr. Alex E. Dong, Code 1146, (415) 877-7504).

Sincerely,

P. W. DRENNON
CAPTAIN, CEC, USN
COMMANDER

Encl:
(1) Evaluation of Pickling Tank Emergency Containment Structure, Treasure Island, Naval Station, Hunters Point Annex, San Francisco, CA, November 25, 1987

Copy to: (w/ encl)
Department of Health Services (Attn: Ric Motini)
Regional Water Quality Control Board (Attn: Bill Hurley)
U.S. Environmental Protection Agency (Attn: Nick Morgan)
San Francisco District Attorney (Attn: Steve Castleman)
City and County of San Francisco (Attn: David Wells)

Blind copy to: (w/ encl)
NAVSTA Treasure Island
COMNAVBASE San Francisco

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2/11/4 cc 127
1/11/4 68B JB

ENCLOSURE (1)

EVALUATION OF PICKLING TANK EMERGENCY
CONTAINMENT STRUCTURE,
25 NOVEMBER 1987

SUBMISSION OF EVALUATION OF PICKLING
TANK CONTAINMENT STRUCTURE

THE ABOVE IDENTIFIED ENCLOSURE IS NOT
AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
SOUTHWEST DIVISION TO LOCATE THIS
ENCLOSURE. THIS PAGE HAS BEEN INSERTED
AS A PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.

QUESTIONS MAY BE DIRECTED TO:

DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
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