



# Department of Toxic Substances Control

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HUNTERS POINT  
SSIC No. 5090.3



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August 21, 2000

Commanding Officer  
Department of the Navy  
Naval Facilities Engineering Command  
Southwest Division  
Attn: Mr. Richard G. Mach Jr., P.E.  
1220 Pacific Highway  
San Diego, California 92132-5190

HUNTERS POINT SHIPYARD: DRAFT ACTION MEMORANDUM, TIME CRITICAL  
REMOVAL ACTION FOR STEAM LINES, FUEL LINES, AND NON VOLATILE  
ORGANIC COMPOUNDS SOIL SITES AT PARCELS C AND D, HUNTERS POINT  
SHIPYARD, SAN FRANCISCO, CALIFORNIA

Dear Mr. Mach:

The Department has reviewed the above-mentioned document dated July 31, 2000. Our preliminary comments are attached.

If you have any questions, please contact me at (510) 540-3822, or Mr. Daniel Murphy in my absence at (510) 540-3772.

Sincerely,

Chein Ping Kao, P.E.  
Senior Hazardous Substances Engineer  
Office of Military Facilities

cc: Ms. Claire Trombadore  
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Mr. Richard G. Mach Jr., P.E.

August 11, 2000

Page 2

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Mr. John Chester  
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## Memorandum

Date: August 21, 2000  
To: Chein Ping Kao, P.E., Project Manager  
From: Eileen Hughes

Attachment: Site Specific Health and Safety Plan Guidance Document for Site Assessment/Investigation, Site Mitigation Projects, Hazardous Waste Site work, Closure, Post-Closure and Operation and Maintenance Activities (Draft), dated July 2000

### **Hunters Point Shipyard: Comments on Draft Action Memorandum for Steam Lines, Fuel Lines, and Non-VOC Soil Sites at Parcels C and D**

At your request, I have reviewed Draft Action Memorandum for Steam Lines, Fuel Lines, and Non-VOC [volatile organic compounds] Soil Sites at Parcels C and D, Hunters Point Shipyard, San Francisco, California (dated July 31, 2000). The document was prepared for the Department of the Navy, Southwest Division, Naval Facilities Engineering Command (Navy) by Tetra Tech EM Inc. The document describes a time-critical removal action (TCRA).

#### **General Comments**

1. California Health and Safety Code (Ca-HSC) Requirements. This report does not meet the substantive requirements of the Ca-HSC: the TCRA will need to be revised as discussed in this memorandum.

Chapter 6.8, Article 2, Section 25323.1: “‘Removal action work plan’ means a work plan prepared or approved by the department or a California regional water quality control board that is developed to carry out a removal action, in an effective manner, that is protective of the public health and safety and the environment. The removal action work plan shall include a detailed engineering plan for conducting the removal action, a description of the onsite contamination, the goals to be achieved by the removal action, and any alternative removal actions that were considered and rejected and the basis for that rejection.” This TCRA should contain a description of the techniques and methods to be used in excavating, storing, handling, treating, transporting and disposing of materials from the site, as discussed in Specific Comment 8. An adequate description of the onsite contamination is not included.

Moreover, a Field Sampling Plan (FSP), a Quality Assurance Project Plan (QAPP), and a Health and Safety Plan (HSP) should be included in the TCRA work plan. The TCRA work plan, FSP, QAPP and HSP should be considered as one document with respect to agency and public review and approval.

The FSP, QAPP and HSP have not yet been received at the Department of Toxic Substances Control (DTSC). The FSP, QAPP and HSP can be submitted as appendices to the revised TCRA work plan. For your convenience, DTSC’s draft guidance on HSPs is attached. This draft guidance is expected to be finalized in the near future with no significant revisions.

The TCRA work plan should be a stand-alone document, summarizing all relevant material, including the results of previous investigations. Reference to other documents (e.g.,

remedial investigation reports) is not sufficient. When reports are cited which have not been approved by agencies, the fact that they have not been approved should be stated: similar notations should be made in Appendix A.

The requirements for removal actions that become final remedial actions are specified in Ca-HSC.

2. Applicable or Relevant and Appropriate Requirements (ARARs). Title 22 of the California Code of Regulations (CCR) and the California Health and Safety Code (Ca-HSC) are ARARs and should be added to Appendix B. In addition to Chapter 6.8, Ca-HSC Chapter 6.5 should be included: for example, the definition of non-RCRA hazardous waste is in this chapter. Resource Conservation and Recovery Act (RCRA) substantive requirements apply, as do similar requirements in California codes and regulations. For example, RCRA substantive requirements regarding transport and disposal of hazardous wastes off the site may apply, pending testing results as required under Ca-HSC Chapter 6.5.

Regional Water Quality Control Board (RWQCB) regulations should be added. Regulations and codes pertaining to above ground storage tanks (ASTs) and underground storage tanks may (USTs) also apply, since tank removals are anticipated (but not specifically identified).

Subpart E of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 Code of Federal Regulations (CFR) 300.4000 et seq) is an ARAR. RCRA and the Comprehensive Environmental Resource Conservation and Liability Act (CERCLA) are ARARs

Are there local and county regulations that, while not ARARs, may be "to be considered" (TBCs) criteria for this work plan?

3. Time-critical removal actions are defined as those responses to releases requiring action within six months. Non-time-critical removal actions respond to releases that can start later than 6 months after the determination that a response is necessary (page 3: USEPA's Guidance on Conducting Non-Time Critical Removal Actions under CERCLA, EPA540-R-93-057). The Navy should provide documentation that this TCRA meets requirements for a time-critical removal action. Statutory limits and any exemptions should be noted.

4. Total Petroleum Hydrocarbons (TPH): 1.0 Purpose, page 1, paragraph 1. TPH screening criteria should be included in the text. TPH screening criteria are used to define site study boundaries according to the Quality Assurance Project Plan (QAPP) data quality objective (DQOs) (assuming that the draft QAPP for Parcel B is similar to the documents that are under development for Parcels C and D).

The report should state that existing sites may be extended or additional sites may be added to either this program or the Regional Water Quality Control Board's (RWQCB's) Corrective Action Program (CAP) if TPH compounds are measured above screening criteria.

5. Contaminants of potential concern (COPCs). COPCs are defined as those compounds at remediation areas (RAs) or de minimus areas (DMs) which exceed the criteria listed in Table 2. For each RA and DM, all identified COPCs should be listed on a table. Spider maps should be included which indicate the concentrations of COPCs.

6. Natural resources. The following statement (page 2) is incorrect and should be removed: "The site is not adjacent to vulnerable or sensitive populations, habitats, and natural resources." A very significant natural resource--the San Francisco Bay--is adjacent to the site. The habitats

and populations of the Bay may be sensitive and/or vulnerable.

7. A status matrix should be provided for all sites in Parcels C and D, indicating which sites will be addressed by this TCRA, and by other programs or work plans.
8. Public participation activities related to the TCRA should be summarized.
9. Signatories. The TCRA should be signed by a licensed professional engineer, since soil excavation is proposed.

### Specific Comments

1. Delineation reports: 1.0 Purpose, page 1, paragraph 1. The text says: "The results of the pre-excavation soil sample analyses will be documented in delineation reports for each of the parcels. Based on the Base Realignment and Closure Team's (BCT) review of the delineation reports, the proposed soil excavation sites and volumes presented in this Action Memorandum may change." The Navy has canceled delineation reports for Parcel B. Does the Navy still intend to provide delineation reports for Parcels C and D? If they are, DTSC comments on the Parcel B delineation reports apply to Parcels C and D. If not, then these sentences should be re-written.

Will delineation reports be provided for each parcel--or for each site (as proposed for Parcel B)?

2. Section 2.1.4: Releases or Threatened Releases, first paragraph, last sentence. The sentence states that if CERCLA contaminants are detected in soil above the TCRA cleanup goals, contaminated soil may be removed (emphasis added). It is presumed that all soil at concentrations greater than cleanup goals will be removed. Under what circumstances does the Navy intend to not meet the TCRA cleanup goals?

This sentence also contradicts the first sentence in the second paragraph under 1.0: Purpose: "The proposed TCRA will remove steam lines, fuel lines, and soil at various sites within Parcels C and D that contain hazardous substances at levels exceeding those listed in Table 2." (emphasis added)

3. Section 2.1.4: Releases or Threatened Releases. Inclusion of estimated excavation volumes in this section does not seem appropriate: volumes should be included in Section 5.1.1: Proposed Action Description. Estimated excavation volumes for each site should be calculated and presented on a table, with sample calculations in an appendix.

4. Section 2.2.1: Previous Actions. Since this proposed work crosses substantial areas of Parcels C and D, information on previous removal actions is especially pertinent. For example, an unexpected contaminant measured during confirmation sampling may be associated with a site where a previous removal occurred. The Navy should provide more information on previous removals. A summary table should indicate: IR site, RA or DM site, COPCs, residential/industrial cleanup scenario, major historic activities at the location, brief description of removal, date of removal, quantities removed, etc. A figure showing the locations of previous removals should be included.

5. Section 2.2.3: Current/Future Actions. This new section should be added. Since this proposed work crosses substantial areas of Parcels C and D, information on other sites which have not yet been remediated should be provided (for the same reason as given in the previous comment). Sites not included in previous removal actions or in these proposed removal actions

should be summarized and identified on a figure.

The relationship between the work proposed in this TCRA and the work proposed in RWQCB's Corrective Action Program should be described, and figures of CAP removals should be included.

The title of Section 2.2 "Other Actions to Date" should be changed to "Other Actions" to allow for discussion of future actions as requested by this comment.

6. Section 3.1: Threats to Public Health or Welfare. In addition to the threats cited in this section, two other threats have not been ruled out: 1) actual or potential contamination of drinking water supplies or sensitive ecosystem, and 2) high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.

This section should discuss residential and industrial cleanup goals for this removal action. The text should identify which categories in the re-use plan are residential and which are industrial cleanup scenarios. The text should note that the residential cleanup criteria on Table 2 are the cleanup criteria specified for Parcel B, Record of Decision (ROD), Explanation of Significant Difference (ESD), and that the industrial cleanup criteria are the 1999 preliminary remedial goals (PRGs) for an industrial scenario. The USEPA reference for PRGs should be cited.

Figures should clearly indicate which areas are to be cleaned up to the residential criteria and which areas are to be cleaned up to the industrial criteria. All TCRA sites (fuel lines, steam lines and non-VOC sites) should be included on this figure. Figure 2 is not sufficient for these purposes. For example, some areas have no designation (i.e., streets). Other sites bridge two land-use designations.

7. Section 3.2: Threats to the Environment. The site is adjacent to the San Francisco Bay and threats that may apply are: 1) actual or potential contamination of drinking water supplies or sensitive ecosystem, and 2) high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.

8. Section 5.1.1: Proposed Action Description. This section should contain a description of the techniques and methods to be used. These include (but are not limited to): excavating (slopes, confined spaces, shoring, dewatering), storing (storage location, bins (covered/lidded), piles, etc.), handling (soil, surface water and groundwater, tanks), treating (dust control), transporting (number of trucks/railcars, routes of transportation), utility clearance, site security, traffic, backfilling (what is "clean" backfill), soil compaction (size of lifts, subgrade level, paving areas to 95% relative density as per ASTM Method D-1557, landscaping areas to 90%, topsoil?), air monitoring, dewatering, site restoration, mobilization/demobilization, permits required (if any), site surveying and disposing of materials (soil, water, PPE, debris) should be discussed. Disposal sites and analytical laboratories should be identified. Soil and groundwater sampling methods should be briefly discussed. Decontamination procedures and staging areas should be described for all tools and equipment.

Excavation drawings should be provided for standard excavations, confined space excavations, shored excavations, and excavations adjacent to buildings. Will the excavations encounter streets, sidewalks, utilities or rail lines? If so, a description of the methods to be used for excavation under these features should be included. Excavations that may impact structures need to be under the supervision of a licensed professional engineer.

How will excavations be dewatered? What procedures will be in place to ensure that contaminated groundwater is properly handled? What procedures will be used to ensure that dewatering will not cause migration of contaminated groundwater?

Post-construction submittals should be described, and schedules provided.

9. Section 5.1.2: Contribution to Remedial Performance. The cleanup criteria for this removal action is based on HHRA concerns only. Ecological threats and groundwater threats have not been considered, and are not ruled out.

10. Section 5.1.4: ARARs. Comments on ARARs are provided elsewhere in this memorandum.

11. Section 5.2: Estimated Costs. A table should be provided which details the estimated costs as per page 43 of USEPA's Guidance on Conducting Non-Time Critical Removal Actions under CERCLA, EPA540-R-93-057.

12. Section 9.0: Recommendation. Comment on this section is postponed pending review by legal advisors. Postponement does not imply approval or agreement.

13. Figure 1. Parcel boundaries are difficult to read on this figure.

14. Table 1. This table is not fully consistent with DTSC's recommendations regarding site cleanup. DTSC's recommendations have been provided to the Navy on several occasions (e.g., for Parcel D, see comments dated August 4, 2000) and are not repeated here. Table 1 is ambiguous and not sufficient since it does not identify the cleanup criteria for each site. As such, it is difficult to compare with previous comments by DTSC: in those comments, a recommendation for both residential and industrial scenarios is provided for each site.

Sites for which DTSC has recommended further action for either residential or industrial criteria cleanup, but which are not included on Table 1, include the following. For Parcel C: IR25: RA25-1, BM3826; IR28: RA28-2, -4, -5, -14, -17, DM8334, -9335, -9420, -9819, -9919; IR58: RA58-4, DM8025, -8130, -8425. For Parcel D: IR08: new DMIR08B022, DM9686; IR09: new RA9-1,2,3; IR333N: DM7657; IR34: DM8258; IR35: DM9363. Other sites not included in the table were considered appropriate for institutional controls/removal action, and sites where there was a potential concern re: groundwater.

15. Table 2.

15.1 The text (page 1) should note that the residential cleanup criteria on Table 2 are the cleanup criteria specified for Parcel B, Record of Decision (ROD), Explanation of Significant Difference (ESD). The risk levels associated with the cleanup criteria and the exposure pathways should be identified.

15.2 A footnote should indicate that the industrial cleanup criteria are USEPA's 1999 PRGs for an industrial scenario. The risk levels associated with the cleanup criteria and the exposure pathways should be identified.

15.3 TPH screening criteria should be added to the table.

15.4 Footnote "h" seems to cite a cleanup criteria for cadmium (1000 mg/kg) that is different from the industrial cleanup goal of 810 mg/kg on the table. This footnote requires additional explanation.

15.5 Regressions for metals, Footnote i. Graphs showing the regressions of chromium III and nickel against magnesium and/or cobalt should be provided, as illustrations of the cleanup goals for these metals. The formulas for the regressions should also be provided.

16. Appendix A. Reports that have not been approved by agencies should be noted as such.
17. Appendix B. The table should be revised to be consistent with comments made on ARARs (above). The table should include all references to ARARs in the text. For example, the first paragraph on page 6 cites CERCLA Sec. 121 (d)(3) and 40 CFR 300.440. These should be added to the table. ARARs cited in the Federal Facilities Agreement (FFA) should also be included (e.g., RCRA/CERCLA integration).

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