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A Member of The IT Group

M E M O R A N D U M

To: Jose Payne (Code 06CH.DD)

Date: October 24, 2000

From: Jim Robbins
Lead Project Manager

Contract No. N62474-93D-2152

Delivery Order: 0091 - Aboveground/Underground Tank Cleaning and Removal

Subject: Work Plan, Response to Comments from the California Regional Water Control Board

Attached is the response to comments contained in the July 12, 2000 letter from Mr. Brad Job, California Regional Water Quality Control Board. This response to comments was inadvertently left out of the package transmitted yesterday that which included the revised Work Plan (and associated documents).

If you have any questions, please contact me at 925/288-2313.

enclosure

* RTC NOT IN AR INDEX 3/14/01

? { RCRA DOCUMENT ?
NOT TO BE INCLUDED IN AR/IR ?

**Response to Comments on the DO91 Aboveground/Underground Tank Cleaning and Removal Work Plan
Hunters Point Shipyard
October 25, 2000**

Comments by: Brad Job, P.E.; Associate Water Resources Control Engineer; California Regional Water Quality Control Board¹

Comment No.	Page No.	Section, Figure, Table	Comments	Response
Work Plan				
1	Page 4-2	Section 4.2.2	Permits and Notifications: Please provide RWQCB with a detailed schedule for fieldwork. In particular, we request at least 48 hours advance notice of removal and/or sampling at the following tank sites: Building 258 - Tanks 1-11; Building 203 - Tank 203-2B; and Building 302 - Tanks U302, U302-1, U302-3. Please be prepared to provide spilt samples at some or all of these locations.	Bill Radzovich, Project Engineer, ROICC, is providing Mr. Job with verbal notification regarding work at these sites. The Navy will coordinate with the RWQCB to conduct a site walk for viewing locations where tanks have been removed and samples taken. Note: Mr. Job's letter references Section 4.2.2; however, there is no Section 4.2.2. It is assumed that the correct reference is Section 3.2, which is entitled Permit and Notifications.
Sampling and Analysis Plan				
2	Page 4-4	Section 4.2.2	Product Tank Contents: Regional Board staff believes that in the case of Building 258, it would be instructive to analyze product samples for halogenated VOCs using Method 8260B.	Concur with comment.
3	Page 4-6	Section 4.4	Groundwater Sampling: Per the Tri-Regional Guidelines, in the event that groundwater is encountered in the tank pit, it will be necessary to collect and analyze a sample. We recommend that the same analyses be performed upon the potential pit water sample as are specified for tank removal soil samples.	Concur with comment.

¹ These comments are copied from the July 12, 2000 letter from Mr. Job. In the introduction, Mr. Job writes that it is not necessary to revise the documents in response to his comments, but rather document concurrence in a brief letter. The Navy has documented its concurrence with comments.

Comments by: Brad Job, P.E.; Associate Water Resources Control Engineer; California Regional Water Quality Control Board¹

Comment No.	Page No.	Section, Figure, Table	Comments	Response
Quality Assurance Project Plan				
4	n/a	General	Regional Board staff was unable to locate within the QAPP where it is specified that silica gel cleanup will be performed on extractable TPH analysis. Please ensure that it is stated explicitly if silica gel cleanup will be performed soil and/or groundwater extracts.	Silica gel cleanup is not being performed on soil and/or groundwater extracts. The QAPP will be revised to state this. Note: EPA Method 8015B does not require silica gel cleanup to be performed.
Site Health and Safety Plan				
5	n/a	General	Although we require work plans to be accompanied by a health and safety plan, review of such plans is outside of the scope of the Regional Board's authority.	Concur with comment.
Environmental Protection Plan				
6	n/a	General	In the event that excavations or soil stockpiles are left unattended overnight, it is appropriate to restrict access to the site by placing temporary fencing or caution tape. In the event stockpiles or excavations are left unattended for a longer period of time, fencing should be constructed and a routine visual monitoring schedule should be enacted that site security and environmental protection measures are not compromised.	Concur with comment.