STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
2151 BERKELEY WAY, ANNEX 9
BERKELEY, CA 94704

N00217.001205
HUNTERS POINT
SSIC NO. 5090.3

March 23, 1990

Commanding Officer
Naval Station Treasure Island
Building I (Code 70)
San Francisco, CA 94130-5000
Attn: Kam Tung

Dear Mr. Tung:

DHS COMMENTS ON THE DRAFT WORK PLAN - VOLUME I, REMOVAL ACTION FOR THE PICKLING AND PLATE YARD - HUNTERS POINT ANNEX

Enclosed are the Department of Health Services (Department) comments on the draft copy of the above referenced report. Please respond on a point-by-point basis and add comments and responses as an appendix to the final draft work plan - Volume I, Removal Action for the Pickling and Plate Yard - Hunters Point Annex.

The final draft of the work plan should be submitted to the Department within 30 days of receipt of this letter.

If you have any questions regarding these comments, please contact Mark Malinowski at (415) 540-3816.

Sincerely,

Mark Malinowski
Engineering Geologist
Region 2
Toxic Substances Control Program

Enclosure

cc: See Next Page

cc: Richard Powell
Naval Facilities Engineering
P.O. Box 727
San Bruno, CA 94066-0720

EPA - Region IX
Chuck Flippo (T-4-2)
Remediation Project Manager
215 Fremont St.
San Francisco, CA 94105

MM:jdm(54)

Comments on the
Draft Removal Action Work Plan - Volume I
for the Pickling and Plate Yard
Hunters Point Annex

Specific Comments

Pg	Sec.	Pgph.	Comment
1	ES	3	Bullet 1. Is the zinc chromate residue subject to land disposal restrictions?
3	1.0	2	Line 6. "California Administrative Code" should be replaced with California Code of Regulations (CCR).
4	1.1	3	Line 6. As described in the report, no soil will be removed during this removal action. If soil is removed, identify characterization and disposal procedures.
10	2.2	2	Line 1. Each zinc chromate sample contained chromium, lead and zinc at hazardous levels. Identify that hazardous levels (above TTLC) of copper and barium were also present.
11	2.2	1	Where is the "paint spot" located. Since the chemical composition of the paint spot is the same as the residue, the material has been characterized as hazardous and must be removed.
12	3.0	2	Identify potential state and federal ARARs in a table format.
13	3.1.2	2	Precisely identify where the nonhazardous liquids will be discharge into the sanitary sewer system.
14	3.1.2.1		Was recycling of the pickling tank contents considered?
15	3.2	1	Lines 5 and 6. Clarify and rewrite.
			Line 8. Does this mean the tanks will be steam cleaned (high temperature and high pressure)?
			Were the tanks filled via an underground or above ground piping system? If under ground piping is found, how will you deal with it?
16	3.3		Prior to capping, inspect and photograph the vault and document the results i.e. cracks, piping and relative locations.

Pg	Sec.	Pgph.	Comment
20	3.4.2	1	How will the sandblast material be characterized?
21	3.4.3	1	Since Building 422 is constructed of cinder-block, will sandblasting be appropriate and effective?
22	3.4.3	1	Line 3. Specify that non-hazardous demolition debris can be disposed of at a Class III landfill.
24	4.1	3	How will the exclusion zone perimeter be identified (marked)?
26	4.2.1	1	Line 5. How will the pH of the nonhazardous containment vault liquids be adjusted prior to disposal into the sanitary sewer? Precisely identify where the nonhazardous liquids will be discharge into the sanitary sewer system. Will the vault sludge be characterized prior to disposal?
26	4.2.2	1	Line 5. Identify that the liquid from the pickling tanks will be sent to a permitted disposal facility.
27	4.2.4	1	How will the brick lining be tested to determine if it is hazardous?
27	4.2.5	1	Prior to capping, inspect and photograph the vault and document the results i.e. cracks, piping and relative locations.
27	4.3	1	Water volumes should be controlled during wetting.
28	4.3	3	Line 8. A WET should be run if contaminants exceed 10x the STLC.
29	4.4.1	1	Wipe tests should be performed on "decontaminated" (sandblasted) materials.
30	4.6	2	What is the anticipated volume of sandblast material? Three (3) samples may not be enough for a representative analysis.
35	5.4	1	The Health and Safety Plan must be approved by the appropriate regulatory agencies prior to any field work.
36	6.0	3	Bullet 1. Off-site treatment must be done by a permitted facility.

Pg	Sec.	Pgph.	Comment
Table 1			Add Building 422 specifications.
Tables 2 & 3			Add sampling dates.
Table 3			Add STLC numbers.
Appendix A			Section 2.1, Pgph 2. The sample of containment vault liquid may not be representative of the vault liquid. Stratification of the liquid has undoubtedly occurred and the Department is unsure of how the sample was obtained. Further discussion of the vault sampling procedures should be presented.