



N00217.001619
HUNTERS POINT
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105

November 23, 1990

Commanding Officer
Naval Station Treasure Island
ATTN: Eddie Sarmiento, Staff Civil Engineer
Building I (Code 84)
San Francisco, CA 94130

Dear Mr. Sarmiento:

Enclosed are EPA's comments on the following documents pertaining to removal actions at Hunters Point Annex:

Attachment 1: Comments on Draft Addendum to Removal Action Work Plan for Tank S-505 - Asbestos Removal Work Plan

Attachment 2: Comments on Draft Addendum to Removal Action Work Plan for Tank Farm - Asbestos Removal Work Plan

As with previous Removal Action workplans, it may be Navy's intention to address certain of the issues raised in our comments in Volume 2 of the Workplan, the design specifications. That should be noted in any response to our comments.

If you have any questions, please call me at (415) 744-2388.

Sincerely,

Chuck Flippo

Chuck Flippo
Remedial Project Manager

cc: Louise Lew, WESTDIV
Mark Malinowski, DHS
Tom Gandesbery, SFRWQCB
Scott Lutz, BAAQMD
David Wells, SFPD

Section 3.1 - Change address!

*US EPA
NESTAPS Coordinator
Attn: A-3-3
75 Hawthorne St.
San Francisco, CA 94105*

Attachment 1

**Comments on Draft Addendum to Removal Action Work Plan
for Tank 8-505 - Asbestos Removal Work Plan**

Compliance with CERCLA Guidance

Page Section Comment

2 1.2 Statement: "The regulations and standards pertaining to ACM removal and the conceptual remedial design are presented."

Comment: The plans' proposed objective is presenting relevant regulations and standards and providing a conceptual remedial design for removing the asbestos.

This plan doesn't include the following components for conceptual design as outlined in *Superfund Remedial Design and Remedial Action Guidance, OSWER Directive 9355.0-4A(SRDRAG)*:

1. A description outlining how removing asbestos-containing materials will be managed. Various parties are mentioned, such as the Navy, a Consultant, the Navy's Consulting radiologist, the Navy's independent monitoring entity and the Contractor, but no details are provided as to who will be responsible for what.
2. Safety, and emergency procedures and contingency plans. This plan references the health and safety section of the *Removal Action For Tank S-505, Volume I - Work Plan, Naval Station Treasure Island, Hunters Point Annex, San Francisco, California, August 1990*, but both of these documents do not contain this information. Also, this plan doesn't reference the site safety plan (*Work Plan Volume 5, Site Safety Plan, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California, April 14, 1990*).

Page Section Comment

3. Background information identifying the type, condition and quantity of asbestos debris; and the condition of asbestos pipe insulation in each of the pump house, berm and tank areas.

2 1.2 Statement: "The second design task will be the preparation of abatement plans and technical specifications."

Comment: This plan is partially written as a technical specification. A number of sections, paragraphs and phrases are very specific and refer to contractual agreements between the Contractor and the Owner. Definitions included in the text are very specific and should be removed and inserted into the technical specification.

13 3.0 Line 4
 16 4.0 Line 9
 21 4.8 Lines 13 &14
 22 4.8 Lines 1-2, 5-6
 27 6.3 Lines 8-9

Comment: These sentences are examples of specific wording in the text that refer to contractual agreements between the Contractor and the Owner.

28 7.1 Statement: "The Navy will review and approve the technical specifications."

Comment: Who will be preparing these specifications?

Compliance with CERCLA ARARs**Page Section Comment**

- 3 2.0 **Statement:** "This section summarizes applicable regulations."
- Comment:** ARARs are not identified for asbestos transport and disposal. ARARs excluded from this plan include U.S. Department of Transport (DOT) regulations. Local fire department requirements should be included as "To Be Considered " ARARs.
- 3 2.1.1 **Comment:** The plan summarizes relevant regulations for asbestos. Generally, these summaries are essentially correct, but not complete. They should be either listed in detail or referenced only.
- 3 2.1.1 **Statement:** 29 CFR Part 1910.134 -- "This regulation contains respiratory protection standards for asbestos exposure and assigns respirator type according to exposure."
- Comment:** 29 CFR Part 1910.134 sets respiratory protection program requirements. 29 CFR Part 1910.1001 sets the respiratory protection standards for asbestos.

Technical Adequacy

The plan includes most information necessary for a technical specification. However, there are number of sections that require clarification.

Page Section Comment

3 2.1.1 Statement: "The following federal OSHA regulations pertain to occupational exposure to asbestos of workers whose work involves exposure to asbestos."

Comment: Awkward wording.

14 3.1,4.,B Statement: "The plan shall also describe ... a detailed description of the method employed in order to control pollution."

Comment: Are there other forms of pollution at the site that should be addressed in this plan?

14 3.1,4.,B Comment: The work plan should also mention that the workers may be notified of asbestos air monitoring results at their request.

14 3.1,4.,B Comment: The personnel air sampling portion of the plan should also include criteria for laboratory analysis.

15 3.1,4,D Statement: "... employee must undergo a respiratory fit test."...

Comment: Documentation should be provided verifying that employees have been successfully fit tested.

15 3.2,F Statement: "The Contractor will be requested to submit ... Certificates of visual inspection "

Comment: Will the Contractor be visually inspecting work? This conflicts with Section 4.5 of this report.

<u>Page</u>	<u>Section</u>	<u>Comment</u>
17	4.1.1.1	<p>Statement: "If variances occurs, the Contractor will be required to adjust work practices accordingly."</p> <p>Comment: To what extent will variances be allowed? How will work practices be adjusted?</p>
18	4.1.2	<p>Statement: "The quantity of ACM at the tank and berm areas does not warrant the construction of an enclosed containment and can be removed as described in 29 CFR 1926.58, Appendix G for small - scale, short duration projects."</p> <p>Comment: The Bay Area Air Quality Management District determines the need for enclosed containment. Have they approved this exception? Also, 29 CFR 1956.58, Appendix G doesn't state any specific quantities for allowing exceptions to the use of containment structures.</p>
18	4.1.2	<p>Statement: "Personal and area air monitoring of airborne fibers will be performed during the work shift at the designated area perimeter"</p> <p>Comment: The sample turnaround time is not indicated.</p>
18	4.1.2	<p>Statement: "as described in Section 7.0."</p> <p>Comment: Should this reference be Section 6.0?</p>
18	4.2	<p>Comment: How is containment constructed with debris present?</p>

<u>Page</u>	<u>Section</u>	<u>Comment</u>
20	4.7	<p>Statement: "Damaged bags will remain in the drum and the entire contaminated drum will be buried."</p> <p>Comment: How will any potential airborne releases from damaged bags be controlled once drums are opened at the disposal site?</p>
21	4.7	<p>Comment: The last paragraph of this section has the right ideas but needs rewording. The Contractor may complete the manifest except in places where the generator, transporter and disposal facilities sign.</p>
23	5.1.2	<p>Statement: "... will wear fire-retardant, disposal protective whole body clothing, head coverings, gloves and foot coverings. Disposable plastic or rubber gloves will be used ..."</p> <p>Comment: Why fire-retardant clothing? If fire retardant clothing is required, plastic and rubber gloves are inappropriate.</p>
25	5.3	<p>Statement: "... and employees are to shower before changing into street clothes in the clean room."</p> <p>Comment: Respirators should be wetted in the shower before removal. Change to read " .. and employees are to shower before removing respirators and changing into street clothes in the clean room".</p>
25	5.3	<p>Statement: "Wastewaters will be handled and disposed as ACM or will be filtered ..."</p> <p>Comment: How will wastewaters be handled and disposed if they are not filtered before discharging?</p>

Page Section Comment

19 4.4 Statement: "The wetted ACM , asbestos waste ... will be removed and immediately placed in sealed impermeable disposal bags constructed of 6-mil plastic sheeting."

Comment: Change the wording to read: "The wetted ACM , asbestos waste ... will be removed and immediately placed in impermeable disposal bags constructed of 6-mil plastic and sealed."

19 4.4 Statement: "Where circumstances prohibit the use of sealed impermeable bags, ..."

Comment: What conditions will prohibit the use of impermeable bags?

19 4.5 Statement: "If recleaning is required, the Consultant will monitor the airborne fiber concentration will be monitored after recleaning."

Comment: Change the wording to read "If recleaning is required, the Consultant will monitor the airborne fiber concentration after recleaning."

19 4.5 Statement: "Once surfaces are certified by the Consultant and the Navy to be free on dust or debris, the Contractor will encapsulate all removal surfaces."

Comment: No mention is made of how long the waiting period will be before the encapsulant is applied.

20 4.6

Statement: "Asbestos waste containers lined with 6 mil polyethylene sheeting will be stored ..."

Comment: Where will the bags be stored.?

Page Section Comment

26 6.2 **Statement:** "Daily air monitoring will be performed throughout the glove bag removal action."

Comment: What type of monitoring? Personal, background ? Where in each area will the monitoring be performed?

28 7.2 **Statement:** "A project closeout package will be prepared ..."

Comment: Who will prepare this package? What will be in this package? At a minimum the package should contain a record of events such as

- safety meetings
- people entering the work areas
- copies of permits
- copies of manifest
- copies of field changes
- daily activities

! ADMIN REC DATA ENTRY SHEET !

ACTIVITY: HPA-----

DOCUMENT TYPE: LETTER REPORT

SUBJECT: Draft Addendum to Removal Action Work Plan for the Tank Farm, Asbestos Addendum

TITLE: (IF REPORT): -----

AUTHOR: (IF REPORT): EPA-----

COMMENTS OR KEYWORDS: EPA Comments on Draft Asbestos Addendum, Tank Farm-----

FOR INDEXING PURPOSES, CIRCLE WHICH CATEGORY THIS ENTRY FALLS INTO:

Site Identification:

Background / Notification / PA / SI / Previous Operable Unit Information

Removal Response:

Sampling and Analysis Plan (SAP) / SA Data / EECA Approval Memorandum
(non-time critical) / EECA / Action Memorandum (AM) / Amendments to AM

Remedial Investigation (RI):

SAP / SA Data / Work Plan / RI Reports

Feasibility Study (FS):

ARAR's / FS Reports / Proposed Plan / Supplements and Revisions to Plan

Record of Decision (ROD):

ROD / Amendments to ROD / Explanations to Significant Differences

State/Federal Coordination:

Cooperative Agreements / Correspondence

Enforcement:

Enforcement History / Endangerment Assessments / Admin Order /
Consent Decrees / Affidavits / PRP Technical Discussions /
Notice Letters & Responses

Health Assessments:

ATSDR Health Assessments / Toxicological Profiles

Natural Resource Trustees:

Notices Issued / Findings of Fact / Reports

Public Participation:

Comments & Responses / CRP / Public Notices / Public Meeting Transcripts/
Documentation of Other Public Meetings / Fact Sheets: Other Press Releases
Responsiveness Summary / Late Comments

Attachment 2

**Comments on Draft Addendum to Removal Action Work Plan
for Tank Farm - Asbestos Removal Work Plan**

Compliance with CERCLA Guidance

Page Section Comment

2 1.2 **Statement:** "The regulations and standards pertaining to ACM removal and the conceptual remedial design are presented in this work plan."

Comment: The plan's proposed objectives are presenting relevant regulations and standards, and providing a conceptual remedial design for removing the asbestos.

This plan doesn't include the following components for conceptual design as outlined in *Superfund Remedial Design and Remedial Action Guidance, OSWER Directive 9355.0-4A(SRDRA)*:

1. A description outlining how removing asbestos-containing materials (ACM) will be managed. Various parties are mentioned, such as the Navy, a Consultant, the Navy's independent monitoring entity, the abatement Contractor and the removal action Contractor, but no details are provided as to who will be responsible for what.
2. A description of safety and emergency procedures and contingency plans. Reference is made to the health and safety section of the work plan (*Removal Action For Tank S-505, Volume I - Work Plan, Naval Station Treasure Island, Hunters Point Annex, San Francisco, California, August 1990*), but it also doesn't contain the necessary information. No reference is made to the site health and safety plan (*Work Plan Volume 5, Site Safety Plan, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California, April 14, 1990*).

Page Section Comment

3. Background information identifying the type, condition and quantity of asbestos-debris associated with the pipe insulation; and the condition of asbestos pipe insulation in each area.

2 1.2 Statement: "The second design task will be the preparation of abatement plans and technical specifications."

Comment: This plan is partially written as a technical specification. A number of sections, paragraphs and phrases refer to contractual agreements between the Contractor and the Owner. Definitions included in the text should be removed and inserted into the technical specification.

12 3.0 Line 4 & 5.

15 4.0 Line 9

19 4.7 Lines 21 & 22

20 4.7 Lines 15, 16 & 20

Comment: These sentences are examples of specific wording in the text that refer to contractual agreements between the Contractor and the Owner.

28 7.1 Statement: "The Navy will review and approve the technical specifications."

Comment: Who will be preparing these specifications?

Compliance with CERCLA ARARs

Page	Section	Comment
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3	2.1	<p>Comment: The plan summarizes relevant regulations for asbestos. Generally, these summaries are essentially correct, but not complete. They should be either listed in detail or referenced only.</p>
3	2.1.1	<p>Statement: 29 CFR Part 1910.134 -- "This regulation contains respiratory protection standards for asbestos exposure and assigns respirator type according to exposure."</p> <p>Comment: 29 CFR Part 1910.134 sets respiratory protection program requirements. 29 CFR Part 1910.1001 sets the respiratory protection standards for asbestos.</p>

Technical Adequacy

The plan includes most information necessary for a technical specification. However, there are number of sections that require clarification.

Page Section Comment

2 1.2 Statement: " Asbestos warning signs will be posted inside Pump Houses No. 111 and No. 112 before the start of the Tank Farm removal action. The asbestos-containing gaskets in the pump houses will remain in place."

Comment: If ACM is inside the pumphouses, what is the ambient exposure level? Will signs inside the building really warn anyone in time? The person may have entered the building and been exposed to the ACM before reading the sign. Why are these gaskets remaining in place if other gaskets are being removed?

3 2.1.1 Statement: "The following federal OSHA regulations pertain to occupational exposure to asbestos of workers whose work involves exposure to asbestos."

Comment: Awkward wording.

13 3.1,4.,B Statement: "The plan shall also describe ... a detailed description of the method employed in order to control pollution."

Comment: Are there other forms of pollution at the site that should be addressed in this plan?

13 3.1,4.,B Comment: The work plan should also mention that the workers may be notified of asbestos air monitoring results at their request

<u>Page</u>	<u>Section</u>	<u>Comment</u>
13	3.1,4.,B	Comment: The personnel air sampling portion of the plan should also include criteria for laboratory analysis.
14	3.1,4,D	Statement: "... employee must undergo a respiratory fit test."... Comment: Documentation should be provided verifying that employees have been successfully fit tested.
14	3.2,F	Statement: "The Contractor will be requested to submit ... Certificates of visual inspection " Comment: Will the Contractor be visually inspecting work? This conflicts with Section 4.4 of this report.
15	4.1	Statement: "Asbestos-containing insulation is located on vertical pipe runs adjacent to each of the eight tank cradles." Comment: How many pipes are adjacent to each tank? Plate 1-1 doesn't indicate the tank cradles or the location of the pipe(s) in relation to the tank cradles.
16	4.1,3.	Statement: "Debris Pile-- ... The gearwheels are nonfriable and should not release asbestos fibers if not damaged during removal." Comment: What procedures will be used to prevent damaging the gearwheels? What will be done if the gearwheels are damaged? What is in the remainder of the debris pile?

Page Section Comment

16 4.1,4. Statement: "Steam Trench-- ... The asbestos-containing pipe insulation in the steam trench will not be disturbed during the removal action at the Tank Farm and does not present an environmental threat in its existing location. The piping will therefore be left in place and not disturbed."

Comment: Will this insulation have to be removed in the future under some other remedial action?

Statement: "To restrict access to the steamlines, all accesses to the steam trench in the Tank Farm area will be labeled ... "

Comment: Labels act as a warning. How will labels physically restrict access?

17 4.1,5. Statement: "Pump Houses No. 111 and No. 112 will be secured during the Tank Farm removal action. Before the removal action begins, asbestos warning notices will be posted inside each pump house."

Comment: If ACM is inside the pumphouses, what is the ambient exposure level? Will signs inside the building really warn anyone in time? The person may have already entered the building and been exposed to the ACM before reading the sign.

17 4.2 Statement: "The wetted ACM , asbestos waste ... will be removed and immediately placed in sealed impermeable disposal bags constructed of 6-mil plastic sheeting."

Comment: Change the wording to read: "The wetted ACM , asbestos waste ... will be removed and immediately placed in impermeable disposal bags constructed of 6-mil plastic and sealed."

<u>Page</u>	<u>Section</u>	<u>Comment</u>
17	4.3	<p>Statement: "Where circumstances prohibit the use of sealed impermeable bags, ..."</p> <p>Comment: What conditions will prohibit the use of impermeable bags?</p>
17	4.3	<p>Statement: "This paragraph assumes that some of the debris associated with pipe insulation is located outside at the Lube Oil Storage Tank Area and at Pump House No. 111. If debris is observed at the Tank Farm, it will be removed by wetting it and placing it into appropriately labeled disposal bags. This work will be performed with caution to minimize the release of asbestos fibers into the air because it (removal of asbestos-contaminated debris) will not be performed inside containment."</p> <p>Comment: What quantity and what types of debris are assumed to be associated with the pipe insulation? The asbestos pipe insulation contains up to 30 percent asbestos and any debris from this insulation may be friable and release fibers. Surfaces should be vacuumed after the ACM debris is removed.</p>
18	4.4	<p>Statement: "Once surfaces are certified by the Consultant and the Navy to be free on dust or debris, the Contractor will encapsulate all removal surfaces."</p> <p>Comment: No mention is made of how long the waiting period will be before the encapsulant is applied.</p>
18	4.5	<p>Statement: "Asbestos waste containers lined with 6 mil polyethylene sheeting will be stored ..."</p> <p>Comment: Where will the bags be stored.?</p>

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19	4.6	<p>Comment: The last paragraph of this section has the right ideas but needs rewording. The Contractor may complete the manifest except in places where the generator, transporter and disposal facilities sign.</p>
21	5.1.2	<p>Statement: "... will wear fire-retardant, disposal protective whole body clothing, head coverings, gloves and foot coverings. Disposable plastic or rubber gloves will be used ..."</p> <p>Comment: Why fire-retardant clothing? If fire retardant clothing is required, plastic and rubber gloves are inappropriate.</p>
23	5.3	<p>Statement: "An airless sprayer is to be located in the decontamination room for employees to wash before entering the clean room."</p> <p>Comment: Showers to wash personnel may be more appropriate than an airless sprayer. Personnel may contact debris contaminated with ACM and may be exposed to ACM while posting signs inside the pumphouses. ACM could be on the outside surfaces of their personal protective clothing.</p>

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23	5.3	<p>Statement: "Wastewaters will be handled and disposed as ACM or will be filtered ..."</p> <p>Comment: How will wastewaters be handled and disposed if they are not filtered before discharging?</p>
24	6.1	<p>Statement: "Three samples will be collected in the Tank Farm area."</p> <p>Comment: Limits of the tank farm area are neither shown on the drawings nor indicated in the text.</p>
24	6.2	<p>Statement: "Daily air monitoring will be performed throughout the glove bag removal action."</p> <p>Comment: What type of monitoring? Personal? background? Where in each area will the monitoring be performed? What type of monitoring will be performed while removing gearwheels in the debris pile and gaskets in piping?</p>
26	7.2	<p>Statement: "A project closeout package will be prepared ..."</p> <p>Comment: What will be in this package? At a minimum the package should contain a record of events such as</p> <ul style="list-style-type: none"> • safety meetings • people entering the work areas • copies of permits • copies of manifest • copies of field changes • daily activities

ADMIN REC DATA ENTRY SHEET I

NAVAL STATION, TREASURE ISLAND
ACTIVITY: HUNTERS POINT ANNEX

DOCUMENT TYPE: LETTER REPORT

SUBJECT: PRELIMINARY ASSESSMENT: OTHER AREAS/UTILITIES

TITLE: (IF REPORT): _____

AUTHOR: (IF REPORT): _____

COMMENTS OR KEYWORDS: PA, EPA REVIEW COMMENTS

FOR INDEXING PURPOSES, CIRCLE WHICH CATEGORY THIS ENTRY FALLS INTO:

Site Identification:

Background / Notification / PA / SI / Previous Operable Unit Information

Removal Response:

Sampling and Analysis Plan (SAP) / SA Data / EECA Approval Memorandum
(non-time critical) / EECA / Action Memorandum (AM) / Amendments to AM

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Notices Issued / Findings of Fact / Reports

Public Participation:

Comments & Responses / CRP / Public Notices / Public Meeting Transcripts/
Documentation of Other Public Meetings / Fact Sheets: Other Press Releases
Responsiveness Summary / Late Comments