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HUNTERS POINT
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

February 12, 1991

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 Volume 2 of the Removal Action, Tank S-505 at Hunters Point Annex. We have a general comment concerning the relationship between this Volume and Volume 1 of the Work Plan. Volume 2 neither incorporates nor references Volume 1, yet many details concerning how the project is to be conducted are addressed in the first volume. (See our Comment #1.) We would like clarification as to whether Volume 1 will be included in the bidders package. If not, we believe Volume 2 may need to include more detail from Volume 1.

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

Sincerely,

A handwritten signature in cursive script that reads "Chuck Flippo".

Chuck Flippo
Remedial Project Manager

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

**EPA COMMENTS ON TANK S-505 REMOVAL ACTION WORK PLAN,
VOLUME 2: DESIGN AND TECHNICAL SPECIFICATIONS**

- 1) Section 01010. Subsections 1.1, REFERENCES, and 1.4, GENERAL DESCRIPTION, should cite "Removal Action for Tank S-505, Volume 1: Work Plan" and "Addendum to: Removal Action for Tank S-505, Volume 1: Work Plan, Asbestos Abatement Work Plan."
- 2) Section 01590. Subsection 3.3.4 should require the contractor to sample and analyze the berm structure prior to removal, if contaminated materials have spilled on it (including contaminated rinsewaters).
- 3) Section 02050. Subsection 1.3.1.a, Demolition Plan, contains no reference to the Removal Action Work Plan.
- 4) Section 02050. A Subsection on Noise Control should be included which provides for conformance to local ordinances.
- 5) Section 02080. For Subsection 1.1, REFERENCES, we suggest adding the following additional references:

Code of Federal Regulations:

- | | |
|-----------------|---|
| 29 CFR 1910.120 | OSHA, Hazardous Waste Operations |
| 40 CFR Part 302 | EPA, Hazardous Substances |
| 49 CFR 171-399 | DOT, Hazardous Materials Transportation |

California Administrative Code:

- | | |
|---------------------------------------|--|
| Title 8, Article 6 | CAL/OSHA, Safety: Construction -
Trenching, Excavation, and shoring |
| Title 13,
Article 13 | California Highway Patrol Hazardous
Material Transportation |
| Title 22, Divi-
sion 4, Chapter 30 | DHS, Hazardous Waste Management |

California Water Quality Control Board Requirements

Uniform Fire Code, by ICBO, latest edition.

- 6) Section 02080. Subsection 1.1, REFERENCES, should include an ending statement such as "In the event of conflict between any of the above documents or with any part of this specification, the more stringent shall govern."
- 7) Section 02080. Subsection 1.2.2, Description of Work, makes no reference to the Asbestos Abatement Work Plan.

8) Section 02080. Subsection 1.3.2.1, Plan for Removal and Demolition of Asbestos, should include a statement that "prior to beginning work activities at the site, establish and construct site work zone as per NAVFAC Drawing No. 6381828."

9) Section 02080. Subsections 1.3.2.3 and 1.3.2.4 reference haulers and landfills "approved by the EPA." EPA does not "approve" haulers and landfills that handle waste asbestos. If you intend that the contractor send this to a landfill permitted by EPA under RCRA, you should state so specifically. Please note, however, that asbestos is not a RCRA waste and disposal of asbestos waste in a permitted RCRA landfill is not required by EPA. A second reference to an "EPA-approved sanitary landfill" appears on in paragraph 3.3.3, page 15 of Section 02080.

10) Section 02080. Subsection 1.3.4.1, Air Monitoring, does not include provision for submittal of results of clearance air samples at the conclusion of the job. This submittal should document that fiber counts after final cleanup are less than 0.01 fibers per cubic centimeter of air.

11) Section 02080. Subsection 1.3.5, SD-93, Administrative or Closeout Submittals, should include:

- c. Employees' training certificates
- d. List of employees who worked at the site during the removal contract
- e. Superintendent's certification
- f. Contractor's analytical results and OSHA compliance.

Also, the number of copies required is not stated. Usually, four copies are required.

12) Section 02080. Subsection 3.2.5, Monitoring, should also include the statement: "Air monitoring shall conform to Section 6 of the Asbestos Abatement Work Plan."

13) Section 02085. Subsection 1.1, DESCRIPTION, should include the statement: "The removal, handling, and disposal of PCB materials shall comply with all applicable local, state, and Federal laws, rules, and regulations."

14) Section 02085. For Subsection 1.2, REFERENCES, we suggest adding the following additional references:

Code of Federal Regulations:

29 CFR 1910.120 OSHA, Hazardous Waste Operations

29 CFR 1910.651 OSHA, Safety: Construction - Trenching, Excavation, and Shoring

49 CFR 171-399 DOT, Hazardous Materials Transportation

California Administrative Code:

Title 13, California Highway Patrol Hazardous
Article 13 Material Transportation

California Water Quality Control Board Requirements

Uniform Fire Code, by ICBO, latest edition.

This Subsection should also include an ending statement such as: "In the event of conflict between any of the above documents or with any part of this specification, the more stringent shall govern."

15) Section 02085. Subsection 1.5.2.1, Licenses, might be clarified by adding a parenthetical title "(Permits and Notifications)". This Subsection should also state: "Evidence that all notifications have been made as required by the applicable regulations shall be submitted to the Contracting Officer prior to start of work."

16) Section 02085. A subsection on Work Zones should be added and state: "Prior to beginning work activities at the site, establish and construct a site work zone as per NAVFAC Drawing No. 6381828."

17) Section 02085. Subsection 3.1, EQUIPMENT, should be expanded to include the following:

All equipment brought on-site shall be steam-cleaned and free from all contamination from previous work and in good working order, with as little leakage of hydraulic fluid, motor oil, and fuel as possible.

All equipment used in or near any explosive atmosphere shall be explosion-proof, grounded, and/or non-sparking.

All equipment used to haul contaminated or hazardous wastes off-site shall be operated by a licensed hazardous waste transport company.

18) Section 02085. Subsection 3.8.2, Soils and Solids, refers to "an EPA-permitted RCRA PCB disposal facility." PCB disposal facilities are permitted by EPA under the Toxic Substances Control Act (TSCA), not RCRA. A number of facilities are permitted under both TSCA and RCRA so that they may handle both PCBs and RCRA-regulated hazardous wastes. If the Navy's intent is to limit the contractor to that universe of facilities

(anticipating, for example, the waste may contain both PCBs and RCRA-regulated hazardous materials), that intent should be more clearly stated.

- 19) Section 02226. We suggest adding to Subsection 1.1, REFERENCES, the Uniform Building Code, 1988 edition.
- 20) Section 02226. Subsection 3.4, COMPACTION, should include a state such as: "In the absence of a soils report, the recommendations of a soils engineer shall be followed."
- 21) NAVFAC Drawing No. 6281829. The description of demolition requirements, "hot" metal burning or cold cutting, presented in the Removal Action Work Plan, is not repeated in the same detail nor referenced in Section 02050. Given that the drawings are likely to be the first element of the bidders package which will be closely reviewed by potential bidders, it would be appropriate to emphasize these requirements by adding a step to the Sequence of Work on the drawing between Laboratory Verification (18) and Hauling (19). This step could read: "Tank size shall be reduced by cutting into pieces of manageable size. Cold cutting is the preferred demolition technique. If hot cutting is used, the contractor shall show, by testing, that the tank atmosphere is not flammable. The Contractor's health and safety office shall witness the test."
- 22) NAVFAC Drawing No. 6381829 through 6381831. The Sequence of Work should provide for a "witness and hold" point for selected items. As an alternative, a statement should be included such as: "The Contractor shall provide a 'competent person' as specified in OSHA Regulation 29 CFR 1926.58, paragraph (e) 6. The 'competent person' shall direct monitoring and training services and shall be capable of identifying asbestos and other hazardous materials. Such person shall have authority to take prompt corrective action to eliminate hazards. Such person shall be on site during all phases of the job."
- 23) NAVFAC Drawing N. 6381831. Notes should include:
 2. Remove any contaminated soil surrounding the catch basin.
 3. Provide adequate shoring to avoid caving of soil.

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