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07 JUN 1991

From: Commander, Western Division, Naval Facilities Engineering Command
To: Commanding Officer, Naval Station, Treasure Island

Subj: REMOVAL ACTION AT TANK S-505, NAVAL STATION, TREASURE
ISLAND, HUNTERS POINT ANNEX

Encl: (1) Action Memorandum for subject project

1. Enclosed please find an Action Memorandum which briefly synthesizes the Removal Action at Tank S-505, Naval Station, Treasure Island, Hunters Point Annex.
2. We recommend that a Removal Action as described in enclosure (1) be implemented at Tank S-505 to reduce potential hazards to the public health and the environment which could occur through accidental releases of hazardous substances at subject project site.
3. WESTNAVFACENGCOM requests your concurrence in our recommendation to implement this removal action. Please indicate your approval by signing enclosure (1).
4. Please direct any questions you might have regarding this matter to Ms. Julie Carver, at (415) 244-2557.

Original signed by:

MICHAEL A. MIGUEL
By direction

Copy to:
HLA (Attn: Ashook Verma)
PRC (Attn: Gary Welshans)
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OIC Treasure Island, HPA
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ACTION MEMORANDUM

SUBJ: INTERIM REMOVAL ACTION AT TANK S-505, NAVAL STATION TREASURE ISLAND, HUNTERS POINT ANNEX.

1. Petroleum Hydrocarbons (PHCs) and Polychlorinated Biphenyls (PCBs) have been detected in surface soils and sludges in and around Tank S-505. The PHCs and PCBs in surface soils and sludges pose a potential threat to human health and the environment if not mitigated. Access to the site is currently partially controlled by fencing and warning placards. However, the contaminants are exposed to the environment and can potentially migrate via wind erosion, storm water run off, and ground water percolation.

2. The objective of this removal action is to remove the continued point source of contamination: the remaining sludge in Tank S-505 and the tank structure itself, and to thereby reduce the potential threat to human health and the environment posed by the organic contamination of the surface residues, sludges, and structures.

3. The removal action consists of the following tasks as described:

- Removal of the contents of the tank and associated piping. Approximately 1.5 feet of PCB containing sludge remains in the bottom of Tank S-505 and as residual in the associated piping. This material will be removed, characterized and disposed of by incineration.

- Removal of the tank and associated piping and pumps. The tank, piping within the berm, and two fuel-oil pumps will be removed, decontaminated, and salvaged for scrap metal. The tank will be decontaminated in place, then dismantled; the piping and pumps will be removed first, then decontaminated. Disposal of decontamination fluids will depend on PCB concentrations and will either be by recycling or incineration at a permitted facility.

- Removal of limited volumes of contaminated soil, concrete tank foundation, and containment berm. At this time, the presence and distribution of PCBs and petroleum hydrocarbons in the soil is not well known. It appears that the contamination is not limited to only the surface soils, which could be easily excavated. Therefore, extensive soil excavation is not included in this removal action. A portion of the containment berm will be removed to provide equipment access; it will be repaired with clean fill, and the contaminated soil generated in this process will be disposed of in accordance with all governing regulations.

- Placement of storm water runoff controls. An impermeable cover will be placed over the surface soils within the berm. The purpose of this cover is to minimize infiltration of rain water into the subsurface, minimize mobilization of contaminated sediment into the site's storm drain system, and to provide some isolation of the contaminated soils from the public and the environment.

- Removal of incidental Asbestos Containing Material (ACM). Prior to implementation of the main removal action, two sites (the pump station and the berm area) within the access area to Tank S-505 will require abatement of friable ACM.

4. The estimated cost of this removal action is \$500,000 to \$1,000,000, with a scheduled completion within 210 calendar days after the required commencement of work. Cost elements include labor, equipment, chemicals, laboratory analysis, transportation, disposal costs, and clean fill/capping costs.

5. The proposed removal action is outlined in the following documents:

- "Implementation Assessment, Removal Action for Tank S-505" by Harding Lawson Associates, dated 14 April 1989.
- "Final Work Plan, Volume I, Removal Action for Tank S-505" by Harding Lawson Associates, dated 20 November 1990.
- "Final Asbestos Abatement Work Plan, Addendum to Volume I, Removal Action for Tank S-505" by Harding Lawson Associates, dated 19 December 1990.
- "Construction Plans & Specifications, NAVFAC Contract Number N62474-91-C-9477, Removal Action at Tank S-505" by Harding Lawson Associates, dated April 1991.

These documents were submitted to the California Department of Health Services, Environmental Protection Agency Region 9, Regional Water Quality Control Board, Bay Area Air Quality Management District, California Department of Fish & Game, U.S. Fish & Wildlife Service, National Oceanic & Atmospheric Administration, City & County of San Francisco, Bay Conservation and Development Commission, Department of the Interior, and the Hunters Point Technical Review Committee Public Member for review and comments. All comments which were generated during the review of the above specified document have been addressed, and when appropriate, have been incorporated into the respective documents.

6. The removal action proposed is consistent with present Remedial Investigation activities. Approval is requested to implement this removal action as described above.

7. The California Department of Health Services (representing the State of California) and the Environmental Protection Agency have reviewed and found all documents pertaining to this removal action to be acceptable, allowing the removal action to commence. Per Section 121.e., of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986, permits are not required for on-site removal actions.

Indicate approval by signing below.

Signature Date

Name

Title