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From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: REMOVAL ACTION AT THE PICKLING & PLATE YARD, NAVAL
STATION, TREASURE ISLAND, HUNTERS POINT ANNEX

Encl: (1) Final Removal Action Work Plan (Volume I)

1. Enclosed please find an addendum to the Draft Final Removal Action Work Plan (Volume I) for the Pickling and Plate Yard, Naval Station, Treasure Island, Hunters Point Annex (HPA). This addendum has been prepared in response to U.S. Environmental Protection Agency (EPA) and Department of Health Services (DHS) comments, both dated 11 June 1991.

2. A copy of this letter and the addendum should be inserted in front of the title page of the Draft Final Work Plan for the Pickling and Plate Yard. This updated document, in conjunction with the Final Air Model for the Pickling and Plate Yard and the Tank Farm at NAVSTA Treasure Island, HPA dated 17 April 1991 constitute the Final Removal Action Work Plan (Volume I) for subject project.

3. Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Julie Carver, Code 1811JC, (415) 244-2557.)

original signed by:

MICHAEL A. MIGUEL
By direction

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ADDENDUM TO DRAFT FINAL REMOVAL ACTION
WORK PLAN FOR THE PICKLING AND PLATE
YARD HAS BEEN INSERTED IN THE REMOVAL
ACTION FOR PICKLING AND PLATE YARD
(VOLUME I) WORK PLAN

REMOVAL ACTION FOR PICKLING AND PLATE
YARD (VOLUME I) WORK PLAN
IS ENTERED IN THE DATABASE AND FILED AT
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**ADDENDUM TO DRAFT FINAL
REMOVAL ACTION WORK PLAN FOR THE
PICKLING AND PLATE YARD
HUNTERS POINT ANNEX**

**RESPONSE TO EPA COMMENTS
DATED JUNE 11, 1991**

**RESPONSE AND ERRATA SHEETS IN RESPONSE TO DHS COMMENTS
DATED JUNE 10, 1991**

NAVY RESPONSES TO EPA COMMENTS

The following are the EPA comments of June 11, 1991 on the draft final *Removal Action for Pickling and Plate Yard, Volume I - Work Plan, Hunters Point Annex, San Francisco, California*, and the Navy's responses.

Comment: In the Response to Regulatory Comments, Appendix A, at the top of Page 7 (currently page 9) states that three samples will be taken from each of the three bins. These specifications are not included in Section 4.6 of the text. Does the Navy intend to specify this sampling scheme in Volume II, the design specification documents? If not, how will the Navy ensure that representative samples are taken by the chosen contractor?

Response: One grab sample for each 5 cubic yards of waste material will be collected prior to placing the waste into the bins, for a total of 3 samples per bin. One-gallon samples of decontaminated solid construction debris (i.e., concrete and bricks) will be sent to the chemical laboratory in bulk. The laboratory will crush and composite the samples prior to chemical analysis. This sampling scheme will be included in Volume II of the Removal Action for Pickling and Plate Yard - Plans and Specifications.

NAVY RESPONSES TO DHS COMMENTS

The following are the DHS June 10, 1991 comments on the draft *Removal Action for Pickling and Plate Yard, Volume I - Work Plan, Hunters Point Annex, San Francisco, California*, and the Navy's responses.

Comment: On page 7, (currently page 9) of Appendix A, it was stated that STLC values were added to Table 3, but Table 3 does not show STLC values.

Response: STLC values have been added to Table 3.

Comment: On Tables 2 and 3, the same 6 collection dates are noted as June 16, 1990 and June 16, 1989. Please check the accuracy of these dates.

Response: The date June 16, 1990 on Table 2 has been corrected to June 16, 1989.

**Table 2. Analytical Data Summary
Pickling Tanks and Containment Vault**

Constituent	Liquid Sample Location ¹					
	PT-1 (mg/l) ²	PT-2 (mg/l)	PT-3 (mg/l)	CV-1 Containment Vault (mg/l)	TCLP (mg/l) ³	STLC (mg/l) ⁴
Chromium, total	230	6.8	320	0.44	5.0	560
Copper	3.1	0.88	32	0.21	NV ⁵	25
Lead	0.5	3.6	4.1	0.3	5.0	5
Nickel	1.2	1.8	2.3	ND ⁶	NV	20
Selenium	220	2.5	2.2	ND	1.0	1.0
Zinc	4.2	3.4	23	0.58	NV	250
TPH	ND	0.41	0.16	ND	NA ⁷	NA
pH (standard units)	2.1	0.9	1.5	5.3	NA	NA

Notes:

1. All samples were collected on June 16, 1989.
2. mg/l: Concentrations expressed in milligrams per liter, equivalent to parts per million.
3. TCLP: Toxic Characteristic Leaching Procedure, 40 CFR 268, Appendix I.
4. STLC: Soluble Threshold Limit Concentration, CCR, Title 22, Article 11, Section 66699.
5. NV: No value established for these compounds.
6. ND: Not detected above the laboratory reporting limit.
7. NA: Not applicable.

Table 3. Analytical Data Summary
Zinc Chromate Residue

Constituent	Sample Description				STLC ³ (mg/l)	TTLC ⁴ (mg/kg)
	Drying Rack 1 (mg/kg) ¹ (RES1)	Drying Rack 2 (mg/kg) (RES2)	Drying Rack 3 (mg/kg) (RES3)	Wipe Sample (mg/cm) ² (WP-1)		
<u>Metals</u>						
Barium	20,000	390	1,400	0.02	100	10,000
Cadmium	24	50	29	0.003	1.0	100
Chromium, total	50,000	53,000	38,000	0.11	560	2,500
Chromium, hexavalent	190	430	91	<0.005	5	500
Copper	21,000	2,100	460	0.02	25	2,500
Lead	4,600	4,600	3,500	0.53	5	1,000
Nickel	71	52	290	0.0028	20	2,000
Zinc	120,000	130,000	93,000	0.31	250	5,000
<u>Organics</u>						
Phthalates	5.4	19.2	ND(13.7)	--		NA ⁵
Phenols	ND(0.37)	ND(0.24)	ND ⁶	--		NA
Polynuclear Aromatics (PNAs)	ND(0.87)	ND(1.50)	ND	--		NA

Note: All samples were collected on June 16, 1989.

1 mg/kg: Concentrations expressed in milligrams per kilogram.

2 mg/cm²: Values expressed in milligrams per square centimeter.

3 STLC: Soluble Threshold Limit Concentration, CCR, Title 22, Article 11, Section 66699.

4 TTLC: Total Threshold Limit Concentration, CCR, Title 22, Article 11, Section 66699.

5 NA: Not applicable.

6 ND: Not detected above the laboratory reporting limit. Values in parentheses are reported below the laboratory detection limit.