



San Francisco City and County
Department of Public Health
Environmental Health Section
Hazardous Waste Program

Gavin Newsom, Mayor
Mitchell H. Katz, Director of Health

Rajiv Bhatia, M.D., M.P.H.
Director of Environmental Health

October 22, 2010

Mr. Keith Forman
BRAC Environmental Coordinator
Hunters Point Shipyard
Southwest Division
Naval Facilities Engineering command
1455 Frazee Road, Suite 900
San Diego, CA 92108

Draft Pier Demolition Work Plan, Hunters Point Shipyard, dated September 2010.

This letter contains comments from the City and Lennar.

General Comment

1. After the pier demolition work is complete, we do not see a reference to a physical survey of remaining (and newly exposed) sections of seawall. The pier demolition will potentially reveal degraded concrete seawall that is no longer holding back soil from falling into the bay, similar to the section of Parcel B seawall that is requiring the installation of steel plate, as has been discussed in the Parcel B RD documents. We suggest that the Navy have a process in place to survey the newly exposed sections of seawall after the piers are demolished to address this concern.

Specific Comments

2. **Section 5.12 – Radiological Control Area (RCA):** This paragraph states that “MACTEC procedure RPO-403 ‘Access to Radiological Areas’ outlines the requirements for access to this controlled area.” Please include a copy of MACTEC RPO-403 in this Work Plan. If it is already included, please refer the reader to its location.
3. **Section 6.2 – Demolition Alternatives and Considerations – Piling Demolition:** While this presents the preferred methodology for initial removal of wood and wood/gunnite encased piles (i.e., snapping), it is unclear what steps will be taken, if any, if the piles snap off above the mud line. We agree that one of the primary goals of the demolition project should be to remove current hazards to navigation. Any broken piles above mud line in shallow water should be classified as a hazard to navigation. Given this, we suggest that the bathymetric survey after the work is complete document all remaining broken piles above the mud line but below the water surface.

4. **Section 6.2 – Demolition Alternatives and Considerations – Piling Demolition, last paragraph:** This paragraph states that based on an evaluation of the various piling deconstruction methods, the Navy chose the “snapping” method for the reasons stated. However, Section 6.3 discusses steel pilings. For consistency, please state in Section 6.2 the chosen method for removing steel piles.
5. **Section 6.2 – Demolition Alternatives and Considerations – Debris-Capture Mechanisms, 3) Floating Debris Boom:** This paragraph assumes that all wood debris will float and relies upon the boom to capture this debris. We believe it is conceivable that some amount of debris will be waterlogged such that it will not float at the surface, but at some depth below the surface, in which case the floating boom will not capture it. We suggest adding weighted netting to the booms to capture this category of debris.
6. **Section 6.3 – General Demolition Approach, third paragraph:** It is stated here that a post demolition bathymetric survey will be performed and possibly a “sweeping” will be conducted using a steel beam oriented parallel to the bottom, apparently for further snapping of remaining piles. Please be sure your post demolition bathymetric survey documents any remaining piles or portions there of.
7. **Section 6.8 – Demolition Equipment:** This paragraph states that there will be two types of booms: a floating environmental boom inside of the debris boom. Please include a specification or cut sheet for each of these types of booms in this Work Plan.
8. **Section 6.9.1 – Potentially Hazardous Materials:** This section states that, prior to demolition, structures, equipment and utilities which potentially contain asbestos, lead, cadmium, and chromium-based paint; equipment with PCB-containing oils, CFCs, and mercury will be visually identified. The previous section also mentions radioactive deck markers, and the SAP (page 55, under “Hard Scrap”) mentions transformers.

Furthermore, we recommend that at least one row of silt curtains be deployed around the active work (demolition) areas for the purpose of minimizing migration of sediments that will be disturbed during pier demolition activities (snapping of wood piles at the mud line, dropping sinking debris into the water, etc.).

9. **6.9.3 – Radiological Screening, last paragraph, last sentence:** This sentence states that “Chemical characterization samples will be collected for each waste stream as described in the project specific SAP, if required.” Please elaborate on how the need for such sampling will be determined.
10. **Section 7.1 – Bathymetric and Side Scan Surveys:** This paragraph states that total quantities of removed material will be calculated based on a comparison of post-demolition and pre-demolition bathymetric surveys. It seems that a comparison of these two surveys would also give an indication of the volume of material that was dropped and sank to the bottom of the Bay. While we understand that every effort will be made to minimize the amount of material that is lost in this way, please consider using these two surveys to assess the volume of this material.

11. **Section 7.1 – Bathymetric and Side Scan Surveys:** Please confirm that all bathymetric data will be made available to the SFRA/Lennar team to facilitate redevelopment efforts. This would be greatly appreciated.

Minor Comments

12. **Section 2.4.1 [Physical Characteristics] Submarine Piers B and C, 4th paragraph, 3rd sentence and 7th paragraph, 1st sentence:** Suggest replacing the word “visually” with “visibly”.
13. **Section 2.4.2 [Physical Characteristics] Wooden Portion of Submarine Quay Wall (Pier C, Berth 55), 5th paragraph, 1st sentence:** Suggest replacing the word “By” with “Based on observations made during a”.
14. **Section 2.4.1 [Physical Characteristics] Wharf No. 2, 3rd paragraph, 1st sentence:** Suggest replacing the word “Upon” with “Based upon a”.
15. **Section 2.5 – Chemical Characteristics, 2nd paragraph, 2nd sentence:** For greater clarity, we suggest rephrasing as follows: “There is also the potential that other equipment located in and on the structures to be demolished contains fluids containing PCBs.”
16. **Section 5.6.4.2 – Single Beam Bathymetric Survey, 6th paragraph, last sentence:** Suggest replacing “25 Foot” with “25-foot”.
17. **Section 6.2 – Demolition Alternatives and Considerations – Piling Demolition, 1) Pulling:** In first sentence, replace “but” with “by”.
18. **Section 6.9.3 – Radiological Screening, 3rd paragraph:** Suggest rewording the phrase “Construction debris which screens non-radiologically impacted” as follows: “Construction debris which is determined by screening to not be radiologically impacted”.
19. **Section 6.9.4 – Radiological Characterization Survey, last sentence:** This sentence states that “The results of the samples collected and the dose rate survey results will be used to justify the level/extent of personnel radiological controls required during the demolition activities.” The word “justify” is vague with regards to the timing and purpose. For greater clarity, please replace the word “justify” with a more accurate word or phrase, such as “establish” or “verify as adequate”.
20. **SAP Worksheet #11 – Project Quality Objectives, Step 3. Identify Information Inputs:** Under “Identify the source of information”, replace the word “sited” with “cited”.

Sincerely,

Amy D. Brownell

Amy D. Brownell, P.E.
Environmental Engineer

cc: Melanie Kito, Navy
James Whitcomb, Navy
Leslie Lundgren, CH2M Hill
Lara Urizar, Navy
Chris Yantos, Navy
Hamide Kayaci, Navy
Simon Loli, Navy
Mark Ripperda, USEPA
Sarah Kloss, USEPA
Karla Brasemle, TechLaw
Ryan Miya, DTSC
Ross Steenson, RWQCB
Andrea Bruss, Mayor's Office
Thor Kaslofsky, SFRA
Jeff Fenton, Mactec
Randy Brandt, Geosyntec
Stephen Proud, Lennar
Dorinda Shipman, Treadwell Rollo