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HUNTERS POINT  
SSIC NO. 5090.3

5090  
Ser T4E1WR/L3364  
30 June 1993

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

Subj: REMOVAL ACTION, AT TANK S-505 AT THE NAVAL STATION, TREASURE ISLAND, HUNTERS POINT ANNEX, SAN FRANCISCO, CA.

Encl: (1) Notification of Field Variance for Removal Action Tank S-505, dtd 24 June 1993

1. Attached for your information and reference is enclosure (1), which provides the details for the proposed disposal of piping and pumps from the subject project to a Class I landfill. In the "Removal Action for Tank S-505, Volume I--Work Plan, Naval Station Treasure Island, Hunters Point Annex, San Francisco, California," (by Harding Lawson Associates, HLA Job No. 02176,247.02, August 28, 1990.), the approved disposal procedure for the piping and pumps was decontamination and salvage of the metal. Any fluids in the piping and pumps will be drained and will be disposed of by incineration.

2. Mr. William Radzevich, the Western Division Remedial Project Manager for this removal action, has previously forwarded this information to your offices by facsimile transmission, and it is his understanding that the agencies do not object to the proposed disposal variance.

3. If there are any additional questions regarding this matter, please notify Commander, Western Division, Naval Facilities Engineering Command (Attn: William Radzevich, Code T4E1WR, (415) 244-2555), by 02 July 1993, since the Navy's contractor will be starting the above work during the week of 05 July 1993.

Original signed by:

RAYMOND E RAMOS  
By direction

Distribution:

U.S. Environmental Protection Agency (Attn: Roberta Blank)  
California Department of Toxic Substances Control (Attn: Cyrus Shabahari)  
California Regional Water Quality Control Board (Attn: Barbara Smith)

Copy to (w/o encl.):

PRC (Gary Welshans)  
Harding Lawson Associates (Ashok Verma)  
NAVSTA Treasure Island (Attn: Jim Sullivan)  
COMNAVBASE S.F. (Attn: Randy Friedman)  
ROICC San Francisco Bay (Attn: Kim Abbot)

Blind copy to:  
09CJC, 18A  
T4A, T4E1, T4E1WR  
Admin Record  
Chron, blue, pink, green  
Activity file: HPA

**NOTIFICATION OF FIELD VARIANCE**

**Project:** Naval Station, Treasure Island, Hunters Point Annex  
Installation Restroation Program

**Authority:** Navy Clean Contract N62474-88-D-5066, CTO 138

**Site:** CU \_\_\_\_\_ R \_\_\_\_\_ PA \_\_\_\_\_ SI \_\_\_\_\_ Removal Action Tank 505

The folowing variance to authorized practice and/or scope is noted:

The contractor for Tank S-505 Removal Action, Environmental Management Services and their subcontractor Erickson request disposing of pumps and piping from the Tank S-505 Removal Action as a Class I PCB-contaminated waste, rather than decontaminating the piping and pumps and salvaging the metal as specified in the Removal Action for Tank S-505, Volume I - Work Plan, Naval Sation Treasure Island, Hunters Point Annex, San Francisco California, (HLA 1990). The contractor believes piping and pumps can not be clean to the levels required, because the interior of the piping is rusted, and pitted.

See attached letter discussing issues and technical reasons for approval of variance.

Recorded by: Peppah Lavelle

Date: 6/25/93

**Distribution:**

Mr. Raymond Ramos  
US Navy - WESTDIV  
Fax - (415) 244-2553

Ms. Barbars Smith  
Regional Water Quality Control Board  
Fax - (510) 286-1380

Mr. Emir Urush  
PRC Environmental Management  
Fax - (415) 543-5480

Ms. Roberta Blank  
US Environmental Protection Agency  
Fax - (415) 744-1916

Mr. Cyrus Shabahari  
California Department of Toxic Substances Control  
Fax - (510) 540-3819

Other: \_\_\_\_\_

**Action Required:**

URGENT: Respond needed by:

At your convenience,  
review/provide comments to:

For Information Only  
NO ACTION REQUIRED.

\_\_\_\_\_  
(Date/Time)

\_\_\_\_\_  
(Name/Company)

\_\_\_\_\_  
(Name/Phone)

**Harding Lawson Associates**



**June 24, 1993**

**11400 0404**

**Mr. Bill Radzevich  
U.S. Navy Western Division, Code 1811 WR  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, CA 94066**

**Contract No. 5086-90-057-004, CTO 138  
Response to Contractor's Variance Request  
Piping and Pumps Decontamination  
Removal Action Tank S-505  
Hunters Point Annex  
San Francisco, California**

**Dear Mr. Radzevich:**

This letter provides Harding Lawson Associates (HLA) recommendations to Erickson International's letter dated June 18, 1993, requesting a variance to the Tank S-505 Removal Action Specifications, Section 02085, Paragraph 3.5.1.4 and 5. Erickson International, the subcontractor for the Removal Action at Tank S-505, proposed disposing to Class I of the piping and pumps rather than decontamination at no additional cost to the Navy. They believe that triple-rinsing the piping and pumps as specified will not reduce the levels of PCB concentrations below the target limit of  $10 \mu\text{g}/100 \text{ cm}^2$ .

Environmental Management Services (EMS) requested the variance to the specification for the decontaminating the piping and pumps because of the interior condition of the piping. They noted that the interior of the piping had rust, pitting and a caked-on material. In their request EMS proposed draining the fluids from the piping and capping the ends, placing the piping in a lined roll-off bin and transporting and disposing of the piping at U.S. Ecology in Beatty, Nevada. Fluid from the pumps would be drained then the pumps would be packed and disposed in the same manner as the piping.

On June 18, 1993, I performed my weekly site visit, and had the opportunity to inspect the interior condition of the piping. This was not previously possible because of the presence of fluids in the piping and tank. The interior of the piping is rusted, pitted and appears to have some sort of calcitic-type deposit. I saw several leaks where the contractor had attempted to purge the pipes.

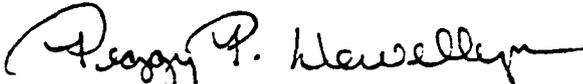
June 24, 1993  
11400 0404  
Mr. Bill Radzevich  
U.S. Navy Western Division  
Page 2

It is always more desirable to decontaminate rather than dispose. However, the interior condition of the piping precludes decontamination. It is highly unlikely that simple rinsing methods will achieve the target limits of  $10 \mu\text{g}/\text{cm}^2$  on this piping. Even after several sets of triple-rinses, Class I disposal could still be required. At which time, a change order would have to be issued, that could potentially cost the Navy additional funds. The time to reclean, resample, and await additional analyses would delay the completion of the project. Since the volume of piping and pumps at Tank S-505 is relatively small (approximately 20 cubic yards), Class I disposal prior to cleaning appears to be a more economical and timely solution. Class I disposal of the pumps and piping rather than decontamination is a change in the approach and procedure outline in *Removal Action for Tank S-505 Work Plan, Naval Station Treasure Island, Hunters Point Annex, San Francisco, California, (HLA, 1990)*, which was reviewed and approved by the EPA and DTSC. Prior to implementation of this change, the Navy should notify and seek approval from the lead agencies.

Please call if you have questions regarding our response to EMS's request.

Very truly yours,

HARDING LAWSON ASSOCIATES



Peggy P. Llewellyn, P.E.  
Senior Engineer

cc: David Leland, HLA  
Scott Wald, PRC

PPL/jlw30046-prc