



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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HUNTERS POINT  
SSIC NO. 5090.3

March 18, 1994

Mr. Bill Radzevich  
Remedial Project Manager  
Mail Code: T4A1BR  
Western Division  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, CA 94066-2402

Dear Mr. Radzevich:

The U.S. Environmental Protection Agency has reviewed the Draft Construction Summary Report, Tank S-505 Removal Action, Naval Station Treasure Island, Hunters Point Annex, dated January 5, 1994. We have the attached comments which should be addressed in the draft final report. Please call me at 744-2394 if you have any questions regarding these comments.

Sincerely,

*Robert Blank*  
for Raymond Seid  
Remedial Project Manager

Attachment (4 pages)

cc: Cyrus Shabahari, DTSC  
Barbara Smith, RWQCB  
Amy Brownell, SFDPH  
Ray Ramos, BEC, NAVFAC WESTDIV

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## Comments on the Navy's Draft Construction Summary Report Tank S-505 Removal Action

### General Comments

1. The drawings, sheets, provided with the summary report are incomplete and should be updated. Drawings are needed that show the actual, final conditions at the site. Specific comments on the drawings are provided below. The phase out submittals (as builts, landfill delivery records, hazardous waste manifests, and certificates of PCB material destruction) should be completed for this report. Section 4 and Table 3 indicate that the submittal process for these documents is still ongoing.
2. The personal medical evaluations included in Appendix D should be removed. These records include personal and confidential information such as negative and positive results of drug screening tests. This information is not needed in the public record. As a suggestion, only provide a summary sheet of personnel who worked on the site. Indicate that they have the necessary OSHA and asbestos abatement training.
3. The report should include responses by the agencies to the appropriate "notifications of field variances" in Appendix A.
4. The extent of remaining contaminated soil within the work areas should be summarized in more detail in Section 6.
5. The Navy should specify the level of confidence with which they concluded that PCBs have been removed from the tank to below the cleanup level.
6. Documentation should be provided by the HDPE liner installer verifying that the installed HDPE provides an impermeable cover. This documentation may include such items as material properties, inspection test reports, photographs, and as built drawings.
7. Manifests 9229870 and 9229871 are not included in Appendix H. Were these the manifests used to document the transportation of the pipe and pump materials to US Ecology in Beatty, Nevada? They should be included in this report.

### Specific Comments

1. Section 1.1, The Navy should use only one term, either ring wall or retaining wall, for the concrete foundation supporting the tank.

2. Section 2.0, The Navy should specify who provided quality assurance services for the project.
3. Section 4.1, Typographical error on pg. 11: the indicated density of 0.99 g/mk should be corrected.
4. Section 4.1, The Navy should specify which samples discussed in the text and listed in Tables 1 and 2 represented liquid and which represented sludge. Information should be provided to allow the reader to verify that soil and tank contents have been properly classified as hazardous or non-hazardous wastes.
5. Section 4.4, Tank volumes in the text (28,600 gallons) and in Table 5 (28, 024 gallons) disagree, please review and correct.
6. Section 4.4, This section does not mention monitoring after final cleanup of asbestos and does not document that the fiber counts after final cleanup were less than 0.01 fibers per cubic centimeter of air (Comment 10, Letter from Chuck Flippo, U.S. EPA to Mr. E. Sarmiento, Commanding Officer, Naval Air Station Treasure Island, February 1, 1991).
7. Section 4.5, Do the sample results from the Navy's cleaning of the 21,000 gallon rinsate holding tank show that no residuals remain in the tank? These results should be presented in this report.
8. Section 4.5, Was the use of absorbents agreed upon by all concerned parties as an acceptable approach for solidifying sludge? What is the chemical composition of the "volclay" absorbent? Who manufactures and supplies this product?
9. Section 4.5, The confined space, daily entry records required by CalOSHA should be included in an appendix.
10. Section 4.6, The Navy should specify which samples discussed in the text correspond to the miscellaneous samples listed on page 5 in Table 6.
11. Section 4.8, The Navy should specify it's plan for remedying the 2 to 3 inches of oily sludge in the bottom of the storm drain lines.
12. Section 4.8, The Navy should specify which manifests or bill-of-lading numbers correspond to the transport units that hauled pumps and piping to US Ecology?
13. Section 4.9, The Navy should report the results of wipe samples taken from the surfaces of the pumps or piping.

14. Section 4.11, The correct reference for compaction is 90 percent of relative maximum density as determined by ASTM D1557.
15. Section 4.11, Documentation should be provided that verifies all equipment was cleaned and free of all PCB contaminated fluids.
16. Section 6.0 & 7.0, The body of the report should explain the observation of petroleum contaminated soil up to a depth of 3 feet in pipe and catch basin excavations. Were these conclusions reached on the basis of soil sampling or visual observations?
17. Table 5, What is the difference between the "solids\*\*" and "solidified sludge" if both include solidified sludge as indicated by footnote \*\*?
18. Table 6, The table lists 8 wipe sample tests with concentrations greater than 10  $\mu\text{g}/\text{cm}^2$ , whereas the text indicates that only 4 resamples were required. Which samples correspond to the resamples for these 8 tests? What is the "pilot" source mentioned in the table?
19. Appendix C, Photo 53. How was the HDPE liner sealed to the strips of HDPE liner attached to the catch basin? This type of detail should be provided on "record of construction" drawings.
20. Appendix E, Many permits and notifications are included in Appendix E. A table of contents would help the reader.
21. Appendix E, Excel Trans, Inc. appears to have transported waste (Manifest 92299813 for waste transported on June 4, 1993) after their Oregon transporter permit expired (permit no. 92CA0684, expiration date May 28, 1993). Is this permit relevant? If not, it should be removed from the report and the correct permit included.
22. Appendix E, A sample confined space entry checklist, as referenced in Section 4.5, is not included in the Appendix E.
23. Appendix H, All manifest included in the report should be the copies signed by the disposal facility and returned to the generator. Were all hazardous waste manifests returned to the generator within 45 days? If not, exception reports are required. Some of the hazardous waste manifests included in this appendix have not been signed by the disposal facility.
24. Appendix H, A summary of hazardous waste manifests, similar to the summary of non-hazardous waste bills-of-lading, would be helpful to the reader.

25. Drawing Sheets 4 & 5, Terms like "to be capped," "remove" and "provide" indicate future work and should be removed. Sheets 4 and 5 should be updated to reflect the final "record of construction."
26. Drawing Sheet 4, Plan View, The Navy should illustrate and discuss in the text of the report how and where were the discharge lines from the removed catch basins sealed. In addition: what do the following labels "CIP", and "IR028369" represent; is the tank foundation a "ring" or "retaining wall"; and is the gravel layer surrounding the catch basins large? Elevations are provided for the cap, but elevations are not provided for any other area surrounding the cap. Elevations and grading should be provided to demonstrate that surface water runoff flows to and from the capped area as designed.
27. Drawing Sheet 4, Section A, Are the sand and base layers 3 or 6 inches thick? The label and measurement shown on the drawing do not correspond. Also, the location of Section A on the plan should be changed to reflect the Section A provided on the drawing.
28. Drawing Sheet 5, The details provided on Sheet 5 are not cross referenced on the other sheets. For example, Section A on Sheet 4 does not indicate the location of an asphalt berm and ramps; details 1 and 2 are not indicated on Sheets 2 or 4; and details 3 and 4 are not indicated on Sheet 4. What is detail 5?