

## Arc Ecology

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December 18, 1996

Commanding Officer  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
(Attn.: Mr. Richard Powell, Code 1832)  
900 Commodore Drive  
San Bruno, CA 94066-5006

**RE: Comments on the Parcel B Proposed Plan, Draft Final, dated October 16, 1996**

Dear Mr. Powell:

Arc Ecology reviewed the Draft Final Parcel B Proposed Plan for Hunters Point Shipyard, dated October 16 1996.

We are very pleased to see that Parcel B will be cleaned to unrestricted residential standards, and we hope that this level of cleanup will be pursued throughout Hunters Point Shipyard. However, we have several substantial concerns, falling into three broad categories. First, we are concerned by the Navy's presumption that treated soils will form the foundation layer for a cap on the Parcel E landfill at IR-1/21. Second, we have several concerns related to excavating Parcel B. And third, we believe the Navy has oversold the effectiveness and underestimated the costs of the proposed treatment.

### I. Use of the Parcel E Landfill

#### **It's Too Early to Presume Availability of the Parcel E Landfill.**

The preferred alternative assumes that soils treated by thermal desorption and/or soil solidification/stabilization will form the foundation layer for a cap at the Parcel E landfill. Arc Ecology believes that the Navy owes it to the surrounding community to do a much more thorough analysis of the consequences of retaining the landfill on Parcel E before any plans are made to deposit more material upon it.

If the Navy wishes to include the Parcel E landfill in proposed remedies for other parcels, we ask that the Navy prepare and circulate a site-specific RI/FS/Proposed Plan/ROD. Until this is done, or until the landfill issues are resolved during existing Parcel E CERCLA process, we oppose placement of new material at this site. Furthermore, we oppose stockpiling large quantities of soil for an extended period, in anticipation of the Parcel E landfill being capped. If the Navy chooses to stockpile soils as part of the Parcel

B remedy, then the potential consequences to the community and the ecosystem must be thoroughly evaluated.

## II. Excavation

### **VOC Control During Excavation Needs More Evaluation or Explanation.**

The Proposed Plan states that alternative S-6 would involve excavating soils for which emissions of VOCs may be difficult to control. Please elaborate. How would VOCs be controlled during excavation? What additional costs might be associated with VOC control during excavation? Could volatilization of SVOCs, including PCBs, also be an issue? Why or why not?

### **Soil Dewatering Needs to be More Thoroughly Analyzed.**

Groundwater is encountered at fairly shallow depths on Parcel B. How would soils be dewatered and/or dried prior to treatment? How would potential VOC emissions from drying soil be evaluated and controlled? How would wastewater be collected, tested and disposed of? Were costs associated with treatment dewatering included in the cost estimates? What would be the effect on costs and performance if soils are not dried prior to thermal desorption treatment?

## III. Proposed Treatment

### **Leachability Tests for Stabilized Soils Need More Explanation.**

Will the Navy mix soils from many sources prior to collecting samples for leachability tests? How large will the stockpiles be from which samples are drawn? Are there regulatory guidelines as to how many samples must be taken from the stabilization process and how they must be analyzed? What kind of analysis will be used to ensure long-term stability of treated soils?

### **Costs and Consequences Associated with Off-site Disposal of Solidified Soils Should Be Presented.**

How much more would it cost if stabilized soils must be disposed of at an off-site landfill? It seems to me that costs of off-site disposal of stabilized soil could be very high, perhaps an additional half to one million dollars. (Estimate calculated by: 25063 cy \* 1.3 bulking factor / 17.4 cy/truck) \* 310.75 \$/truckload = \$581, 887 + \$50,000 for disposal fees). How would these soils be moved off-site?

### **Thermal Desorption Technology is Oversold.**

What level of effectiveness can be achieved by the proposed thermal desorption technology for Parcel B chemicals of concern, particularly for PCBs? The EPA SITE data we've seen shows much higher residual levels for PCBs than Hunters Point target cleanup levels for Parcel B. This implies that treated soils anticipated to be disposed of at the Parcel E landfill will be contaminated above Parcel B target cleanup levels. Furthermore, we understand that treatment of the "fines" in thermal desorption units can be a problem, even when they are run back through the treatment unit. Please provide more information

about typical problems encountered with high-temperature thermal desorption treatment and assess the level of cleanup possible using thermal desorption on Parcel B soils.

What is the contingency plan should treatability studies conclude that thermal desorption will not achieve an appropriate levels of cleanup?

What sort of stack gas emissions and fugitive dust emissions are typical of high temperature thermal desorption units? What air emission performance standards would apply? What sort of technologies would be used to control stack emissions?

Treating PCBs by thermal desorption requires high operating temperatures, in the range of 1200 degrees Fahrenheit. This temperature is above the boiling pints for arsenic, mercury, and thallium. How effectively can these volatilized metals be removed from stack gases.

**The Costs Estimated for Thermal Desorption Treatment Seem Low.**

The cost estimate for the preferred alternative seems low. The Feasibility Study states that high temperature thermal desorption must be used to treat the SVOCs. Yet, the cost estimate worksheets in Appendix E of the Feasibility Study, use \$91/ton to estimate costs for low-temperature thermal desorption. According to EPA's SITE documents, the cost of a high-temperature unit ranges from \$100 to \$300 per ton of soil with the high end being typical of units treating PCBs. Using these unit cost factors would increase the cost of cleanup by \$159,000 to \$3,687,000.

How would the Navy respond if costs associated with the preferred alternative were overrun by a significant amount, over the contingency? How would costs of off-site disposal be covered if it became necessary sometime during the remediation effort?

Overall, we support remedial actions at Hunters Point Shipyard that help to restore the area to the condition that the Navy found it. Our preference is for remedial actions that do not require the Navy to carry out long-term maintenance and monitoring at the Shipyard. Not only does this strategy assure the community that the site, and the surrounding ecosystem, will remain safe, but also it allows the City flexibility in planning reuses that benefit and enhance the neighboring community.

We welcome the opportunity to comment on the Proposed Plan for Parcel B at Hunters Point. As always, it is our intention to help the Navy craft the best cleanup possible at Hunters Point.

Very truly yours,



Christine S. Shirley  
Environmental Analyst