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Ser 702P3/L9154-1
3 June 1999

Mr. David Leland
Regional Water Quality Control Board
Groundwater Protection and Waste Containment Division
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subj: RESPONSES TO RWQCB UST COMMENTS

Dear Mr. Leland:

Enclosed are the Navy's responses to your May 5, 1999 comments on the Draft Underground Storage Tank Removal Plan and Draft Sampling and Analysis Plan Addendum.

If you have any questions regarding this enclosure, please contact Ms. Jil Finnegan, Code 702P3, at (650) 244-2554.

RICHARD E. POWELL
By direction

Encl:

(1) Response to Regional Water Quality Control Board Comments on Draft Underground Storage Tank Removal Plan and Draft Sampling and Analysis Plan Addendum, UST Removal at Parcel B, Hunters Point Shipyard, San Francisco, California (dated April 1999)

Copies to:

U.S. Environmental Protection Agency (Attn: Ms. Claire Trombadore)
California Department of Toxic Substances Control (Attn: Mr. Chein Kao)

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**Response to Regional Water Quality Control Board Comments on Draft
Underground Storage Tank Removal Plan and Draft Sampling and Analysis
Plan Addendum, UST Removal at Parcel B, Hunters Point Shipyard, San
Francisco, California (dated April 1999)**

UST Removal Plan (Work Plan Section 5.6)

Comment: The Introduction should provide as much information as is available regarding the tank, including size, location, and contents.

Response: The following was added in Section 5.6 of the Work Plan: Currently, the only tank to be removed is located at the northern end of IR-23, near the southern end of Berth 64. It is believed to be a 1,000 gallon steel single wall diesel supply tank.

Comment: Pre-Removal Procedures, fifth paragraph. Please clarify the statement that the LEL will be less than 10%. Does this mean that the readings on the LEL meter will be less than 10% of the LEL?

Response: The LEL meter readings will be less than 10% of the LEL. The sentence was changed to clarify this issue.

Comment: Removal Activities, second paragraph. The text should be more specific regarding what the extent practical means.

Response: Agreed. The following was changed or added to the text: Piping associated with the UST will be removed to the extent practical. Piping running under buildings or concrete structures greater than 12 inches thick will not be removed. Piping not removed will be triple rinsed and grouted in place with a 95% cement and 5% bentonite mix.

Comment: Excavation and Sampling. 1) The reference to the SAP should include a specific reference to the Sampling and Analysis Plan Addendum developed for this activity. 2) Please describe how free product encountered in the excavation will be handled.

Response: 1) The text was changed to read as follows: The initial soil samples will be collected from native material surfaces in the excavation in accordance with the UST Removal Addendum in the Site Specific Sampling and Analysis Plan (SAP), and will follow the guidelines of the Tri-Regional Water Quality Control Board Staff.

Response: 2) The following text was added: Removal methods will use of a length of pipe or stinger placed in the liquid and connected to a vacuum hose. The hose may be attached to a vacuum truck or a portable pump discharging into DOT approved 55 gallon drums.

Sampling and Analysis Plan Addendum

Comment: The introduction suggests that this plan may be used for other USTs encountered at Hunters Point or other UST excavations. If this is the case, the plan should be expanded to address the possibility that a waste oil tank or suspected waste oil tank could be encountered. If the plan only applies to the tank of immediate concern, then that should be clearly stated in the introduction. This addition would affect the analytical program.

Response: The following was added to the text: These details are specific to petroleum hydrocarbon product supply tanks only. The requirements for the sampling and analysis of waste oil tanks are substantially different and not the subject of this addendum.

Comment: Table 1. The PQL for water samples should be in units of ug/L.

Response: Agreed, the units were changed to ug/L.