

## DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY  
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January 27, 1987

Mr. Alex E. Dong  
Head, West Central Environment Section  
Department of the Navy Western Division  
Naval Facilities Engineering Command  
P.O. Box 727  
San Bruno, CA 94066-0720

Dear Mr. Dong:

We have reviewed the workplan dated December 11, 1986, for the proposed cleanup of the PCB-contaminated soils near Building 503 at Hunters Point Naval Shipyard. At this time, we cannot offer final comments nor agree to the workplan. However, our comments and suggestions to the information supplied to us to date, are as follows.

The proposed cleanup should be regarded as an interim remedial measure on the basis that; (a) the PCB-contaminated area appears to be only a small fraction of the overall remedial actions which will be required at Hunters Point Naval Shipyard, (b) an immediate cleanup response should significantly reduce or eliminate the potential for migration of the PCB's and for the PCB-contaminated area to pose an imminent and substantial endangerment to public health and the environment, and (c) there is still uncertainty about the extent of contamination.

Therefore, a Remedial Action Plan (RAP) and a closure plan are not required at this time. We recommend that final cleanup of this site area be addressed and included in the RAP for the overall program at Hunters Point Naval Shipyard. Under separate cover, I have provided Mr. Greg Brown information about our RAP requirements.

In regard to your proposed cleanup levels, it should be noted that the U.S. Environmental Protection Agency (EPA) has promulgated recommended advisory levels for cleanup of PCB - contaminated soils. These are based upon site use. EPA recommends cleanup to background levels unless it can be shown that residual levels after cleanup pose no threat to public health with respect to routes of human exposure. We realize that it is unrealistic to expect total removal of the contamination and that the potential mobility of the PCB contamination is low. However, we will need to know the results of the post - cleanup sampling and the details for future use of the area before being able to comment on whether or not an appropriate level of safety is being provided.

For the overall project at Hunters Point, a community relations program should be developed and implemented as soon as possible. Again, I have separately provided Mr. Brown with guidelines for this process.

Specifically, we request that the following matters be addressed:

- o Please submit details of the Health and Safety Plan prior to commencement of activity at the site.
- o We also need to be advised in advance about the pertinent details for shipment of the excavated materials from the site. (I have also forwarded a transportation checklist to Mr. Brown).
- o The presence of chlorinated dibenzo -p- dioxins and dibenzofurans are frequently associated with PCB spills. These are extremely toxic compounds which can pose serious public health hazards. Sampling and analysis for these compounds should be undertaken. For the protection of site workers, the results should be known prior to initiating cleanup activities.
- o Pursuant to the comments from the Regional Water Quality Control Board (RWQCB), we concur that potential ground water, subsurface, and surface water routes be tested in order to determine if there has been any migration of the contaminants or if there is a risk of discharge of the contaminants to the Bay. We also agree with the RWQCB that the site area should be rechecked for presence of hydrocarbons.
- o Basic public information and notice should be developed and made available as soon as possible. A simple fact sheet should be devised with the following elements:
  - a) A summary of the contamination problem and the potential hazards.
  - b) The rationale for the interim remedial measure.
  - c) The proposed cleanup method and the reason for choosing it
  - d) The schedule of relevant cleanup activities
  - e) Names and phone numbers of appropriate representatives to contact for further information (e.g. your designated representative, myself, other relevant agency contacts)

The fact sheet should be limited to facts and kept simple. It should be written in ordinary and non-technical language as much as possible. We would like to review and approve its final form.

Copies of the fact sheet should be made available at a public repository (e.g. a local library).

A public notice should be placed in the newspaper to notify of the planned cleanup activities and proposed dates for cleanup. The public notice should also indicate how and where the fact sheet may be obtained. Appropriate local, State, and Federal elected officials and agencies should be notified prior to the publication of the notice.

- o A thorough sampling/analysis plan for verification of cleanup levels should be provided.

We hope that these comments and suggestions are helpful and clear. If you have any questions, please contact me at (415) 540-3434.

Sincerely,



Robert A. Crandall  
Hazardous Material Specialist  
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RAC:cdl

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