

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704

February 18, 1987

Alex E. Dong
Head, West Central Environmental 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 Navy's proposal with respect to an interim remedial action for removal of the PCB - contaminated soils at the site area near building 503, per our meeting of January 29, 1987. We have no objection to this cleanup measure provided that the following conditions are met:

1. The comments and requests stated in our letter to you dated January 27, 1987, will be adequately addressed.
2. In accordance with guidelines and recommendations of the San Francisco Regional Water Quality Control Board (RWQCB), a monitoring program (and mitigation efforts, if necessary) will be undertaken to prevent any migration of contaminants through groundwater, subsurface, and surface water routes, particularly with respect to the RWQCB's concern for protection of the San Francisco Bay.
3. We concur with EPA's recommended PCB cleanup level of 25 ppm with the condition that any areas having a residual PCB concentration greater than background levels be covered over by concrete, asphalt, or a minimum of 10" of clean soil.
4. We request that you provide us with a written general description of the Shore Intermediate Maintenance Activity (SIMA) facility and the plans for its construction. We also request that you provide us with information relating to the nature of the operations and material which will be used.
5. As stated in EPA's letter to you dated February 4, 1987, an appropriate deed restriction is to be placed on the property detailing locations and levels of remaining PCB soil.
6. During the process of soil removal, if greater amounts of contamination are found than indicated by previous sampling/analysis, construction plans for the Shore Intermediate Maintenance Activity (SIMA) facility may have to be delayed until we have had time to review and comment upon the new information. Contingencies for such a situation should be considered in advance.

7. The McGraw-Edison PCB test kit may be used as a "screening tool" in the field, provided that it is calibrated for the site.
8. Additional site characterization should be conducted in conjunction with cleanup and construction efforts. A thorough and comprehensive verification plan must be implemented in order to confirm that cleanup levels have been achieved. We request you have 10 percent of the samples split by your laboratory. These split samples are to be submitted to the State's Hazardous Materials Laboratory (HML) for confirmation. Their address is:

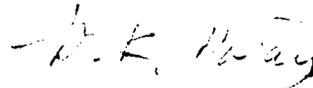
State of California
Dept. of Health Services
Hazardous Materials Laboratory Section
Berkeley, CA 94704
ATTN: Bart Simmons
(415) 540-3003.

Please advise us as early as possible as to when the receipt of the samples can be expected, so that we may notify HML in advance. The cost of the State's analytical work will be charged to the Navy.

9. The fact sheet and public notice which you have prepared for this interim remedial measure has been approved by the Department. We strongly feel that fact sheet should be mailed to tenants on the base, local residents/contiguous property owners, elected officials, and any other potential affected interests. The Department can assist you in development of the mailing list.

We appreciate your cooperation and willingness to take prompt action to protect public health and the environment. Please contact Robert Crandall at (415) 540-3434 if you have any questions.

Sincerely,



Howard K. Hatayama
Senior Hazardous Materials
Specialist
North Coast California Section
Toxic Substances Control Division

HKH:RC:ses

cc: Rich Vaille, US EPA, Region IX
Lester Feldman, RWQCB SF Bay
Bill Lee, SF Bureau of Health
Steve Castleman, SF District Attorney's Office