



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 24, 2003

Mr. Jerry Dunaway
Southwest Division, Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92101-8517

RE: Question of PCB Contamination on Dump Road

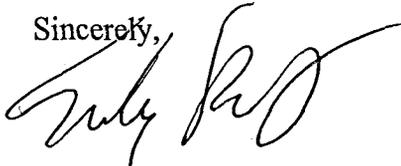
Dear Mr. Dunaway:

EPA and DTSC have recently discussed the possibility of polychlorinated biphenyl (PCB) contamination on dump road. In the course of our review of the Data Gaps report for Investigation Area (IA) H1, it was noted that PCBs are present at depth along Dump Road. However, it does not appear that any characterization of shallow soil samples collected from Dump Road for PCBs has been performed. In the past, prior to it becoming known that PCBs were hazardous, PCB-contaminated oils were often mixed with other waste oils and these oils were then recycled as dust suppressants for dirt roads and parking areas. We believe this is how the Defense Reutilization and Marketing Office (DRMO) yard at Mare Island (which is adjacent to Dump Road) became contaminated with PCBs. Thus, it is possible that the PCBs found at depth along Dump Road originated from the oil applied to the road.

Because of the current frequent use of this road, EPA and DTSC urge the Navy to sample for PCBs in surface samples on Dump Road as soon as possible. We suggest collecting soil samples at 200 foot intervals along Dump Road (21 locations) at depths of 0-6" and 6"-12" at each sample location - soil samples should include depths which display "asphalt-like" characteristics. The worst areas of PCB impact appear to be adjacent to the sludge drying beds in the former sanitary sewage treatment plant, at the location of monitoring well 01W038A (where PCBs have been detected in shallow groundwater samples), adjacent to the DRMO yard and approximately 430 feet west-southwest of the DRMO yard. Please assure that these locations are among those selected for sampling.

Mr. Jerry Dunaway
October 22, 2003

We are writing this letter now, before submitting our comments on the Data Gaps Report, in order to urge the sampling of this area as soon as possible. We would appreciate your immediate attention to this matter. If you have any questions about this matter, please contact me or Chip Gribble of the DTSC.

Sincerely,

Emily Roth
Remedial Project Manager

cc: Carolyn d'Almeida, EPA
Gary Riley, RWQCB
Chip Gribble, DTSC
Henry Chui, DTSC
Dwight Gemar, Weston