

# Department of Toxic Substances Control

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Governor

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Secretary for  
Environmental  
Protection

March 29, 1999

Commanding Officer  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
Attn: Mr. Ernesto Galang  
900 Commodore Drive  
San Bruno, CA 94066-2402

## **DRAFT ADDITIONAL DIOXIN CHARACTERIZATION SITE 12 - OLD BUNKER AREA TECHNICAL MEMORANDUM (JANUARY 7, 1999)**

Dear Mr. Galang:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Additional Dioxin Characterization Site 12 - Old Bunker Area Technical Memorandum, dated January 7, 1999. DTSC has the following comments:

### Specific Comments

1. Page 2, Section 3.0, Objectives

This section indicates that the additional dioxin sampling at Site 12 was to characterize the vertical distribution of dioxins in soil. After reviewing the results presented in Section 5.0 and the Borelogs presented in the Appendix, DTSC has concluded that the sampling did not accomplish this objective. For example, boring log 12-HP184 indicates the presence of glass pieces, wood, and bits of metal at approximately five feet and also indicates that the boring met with resistance at approximately six feet and was then terminated. The presence of this type of debris at depths greater than the deepest sample collected indicates that contamination is certainly possible at depths below the depths sampled thus far. Based on this information, DTSC believes that further sampling needs to be considered to characterize the vertical extent of dioxin contamination at Site 12.

Additional sampling was discussed in a meeting on January 8, 1999

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between the Navy; DTSC and the City of San Francisco yet nothing further has been proposed as a result of those discussions.

Please describe what further measures are being planned to characterize the vertical extent of dioxin contamination at Site 12 and include a proposed schedule for review.

2. Page 6, Section 6.0, Risk Characterization and Discussion

The Navy has provided estimates of excess cancer risk for a residential scenario by comparing the equivalent concentrations to the U.S. EPA Region IX Preliminary Remediation Goal for 2,3,7,8-tetrachloro-dibenzo-p-dioxin. Please also provide risk estimates based on the DTSC standard default parameters.

If you have any questions regarding this letter, please contact me at (510) 540-3763.

Sincerely,



David Rist  
Hazardous Substances Scientist  
Office of Military Facilities

cc: See next page.

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cc: Mr. David Leland  
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