

DEPARTMENT OF HEALTH SERVICES

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ALAMEDA POINT
SSIC NO. 5090.3

Mr. Victor I. Crawford, P.E.
Environmental Operations Section
Department of the Navy
Western Division, NAVFACENCOM
Box 727
San Bruno CA 94066

June 22, 1984

Dear Mr. Crawford:

This is in response to the Navy's hazardous waste "verification proposal", dated May 25, 1984. As you are aware, the Department of Health Services received this document June 13. We understand that this proposal is intended only to identify areas where hazardous wastes are present, and that an expanded "characterization proposal" will be subsequently submitted for those contaminated areas identified. With this in mind, we have evaluated the preliminary proposal, and wish to provide the following comments:

1) 1943-1956 disposal area

The current proposal calls only for installation of shoreline monitoring wells "selected to give a high probability of encountering contamination." The existence of hazardous wastes within the landfill would therefore be determined solely on the basis of contamination detected in water within these perimeter wells.

The Department feels this proposal is not adequate to identify contaminants which may be present within the landfill itself. Therefore, soil sampling should be included in the verification study. We suggest that soil borings be taken from within the landfill at the same time that well drilling is performed. A grid pattern should be used to determine boring locations, unless reliable information is available detailing specific areas where wastes have been disposed. The depth of the fill will determine the approximate depth of the boring. Samples from each boring should be analyzed for total metals (as listed in the California Assessment Manual), pH, and organic chemicals.

While the currently proposed well locations may be optimally placed to detect pollutants migrating into bay waters, it is unlikely that worst-case leachate conditions will be detected this far from the major source of contamination. We therefore recommend that additional wells be drilled at locations which will assess the condition of groundwater beneath the landfill. Water samples should be analyzed for metals, organic chemicals, and pH.

2) Seaplane Lagoon

Sediment samples should be analyzed for all California Assessment Manual (CAM) metals, and "non-PCB" organic chemical peaks should also be identified in the GC analysis. In addition, we suggest that one or two samples be collected at depth (as originally proposed in the IAS), as surface samples alone may be inadequate to assess the presence of contaminants discharged ten years ago.

3) Buildings 301 and 389

Samples should be collected from the upper six inches of soil.

4) CAN-2 Area

In areas where soils have not been disturbed, please collect surface samples

from the upper six inches of soil. Please add CAM metals and pH to the analytic parameters. All major hydrocarbon peaks present in the GC analysis should be identified. Also, due to the heavy use of solvents in this area, at least one monitoring well should be placed here. Water from the well should be analyzed for metals, organic chemicals (by GC/MS) and pH.

5) Building 360

All CAM metals should be included in the analysis, and samples should be collected from the top 6 inches of soil.

6) Area 97

Wherever elevated hydrocarbons are detected in well water (above background concentrations), samples should be analyzed to determine the specific organic compounds present. In addition, if new wells are to be drilled, soil samples should be collected at that time and analyzed for lead and organic chemicals.

7) West Beach Landfill

The Initial Assessment Study for this landfill indicates that this area accepted from 30,000 to 500,000 tons of hazardous waste over a 15 to 20 year period. Among those wastes reportedly disposed of at this landfill are solvents, paint wastes, plating wastes, sludges, strippers/cleaners, acids, PCB's, asbestos, pesticides and infectious wastes.

Based on this description of the site, the Department feels that a significant disposal of hazardous wastes has occurred which may pose a significant present hazard to the environment, or a potential future hazard to public health and safety if the property changes hands and/or the materials within the landfill are exposed via excavation or erosion.

In order for the Department to consider this landfill nonhazardous, documentation must be provided indicating that (a) the reported waste materials are actually not present in this landfill at potentially hazardous concentrations (as determined by sampling of the fill itself), or (b) if the materials are present, they pose no present or potential hazard to public health and safety or the environment via groundwater contamination, contaminated surface runoff, air pollution (windblown dust, fumes or volatilization of chemicals), fire, explosion, or direct contact with landfill wastes.

To date, characterization studies at this landfill have consisted solely of analyses of well water samples. These analyses have indicated the presence of elevated concentrations of metals (as much as six times the Safe Drinking Water Standards) and organic chemicals (PCB's, benzene, toluene, naphthalene, acetone, aldrin, DDT, etc.). The actual or potential impact of these materials on adjacent bay waters has not been formally addressed. However, we understand that the Regional Water Quality Control Board (RWQCB) has ordered the Navy to undertake certain corrective measures (capping and construction of an impermeable leachate barrier) to mitigate any such impacts.

It may be true that the landfill will pose no groundwater or surface runoff hazards upon completion of the RWQCB-mandated mitigation measures (the Department has not yet seen the design criteria for the capping/walling plan and therefore cannot comment on the adequacy of the proposal). However, this measure alone does not satisfy all of the Department's cleanup/closure concerns, as it does not address possible future exposures via fire, explosion, direct contact or air contamination.

As mentioned above, these hazards may be ruled out by soil sampling which demonstrates that no hazardous materials are actually present in the fill material.

If soil sampling does detect hazardous substances, hazards associated with direct contact, etc., may be mitigated by total removal of these contaminated soils, by encapsulation of the hazardous materials onsite in combination with a land use restriction, or by some other means. A land use restriction, if appropriate, would require (among other things) longterm maintenance of the protective cap and leachate barrier, would prohibit unapproved excavation or removal of materials below the protective cap, would preclude certain future land uses (residences, schools, hospitals, etc.), would require full disclosure of the contaminants present to any potential buyer of the property, and would be binding on all future property owners.

We request that you reconsider characterization work performed to date in view of the above comments, and submit as soon as possible a final mitigation plan which addresses all of DOHS' concerns regarding this landfill. In addition, we request that you submit the following information pertaining to this site:

- (a) A map indicating the locations of all wells drilled on this site from 1975 to the present;
- (b) Results of the early well sampling program (circa 1977) which detected "low levels" of lead, oil and grease, etc.;
- (c) Sampling results for all wells analyzed in July, 1983 (the IAS indicates that wells 3, 8, 9, 19, 20-25 were sampled, but metals analyses are reported only for wells 21-23. Were other samples analyzed?)
- (d) Design specifications (if available) for the capping/walling plan.

It should also be noted that there appears to be a disparity in the organic chemicals analyses performed by EAL and ASA. The labs utilized different analytic techniques, with differing results. While EAL reported the presence of several volatile materials, several acid/base-neutral compounds and several pesticides, ASA reported none of these (but did report PCB's). ASA appears not to have analyzed one set of samples for pesticides (as indicated by a "dash" in the results column as opposed to "ND" for nondetected). In addition, ASA's detection limit for pesticides is higher than many State action levels for these materials. Because of these disparities, DOHS must question the validity of these data in determining the quality of groundwater present.

8) Other Potentially Hazardous Sites

In addition to the sites described above, the Initial Assessment Study identifies 5 areas which may be contaminated with hazardous materials: the estuary and turning basins (contaminated sediments), fuel lines throughout the station, a fire training area, and an old oil refinery. The Navy initially ruled out further study in these areas based on low scores received by these sites on the Navy's hazard ranking model. However, though these sites are not described in depth, the descriptions which have been provided appear to indicate potential hazards associated with each site. For example, the report indicates that refinery wastes were dumped on one site, along with asphaltic residues, creating sufficient vapor pressure to disturb subsequent surfacing. Apparently, the wastes were later covered with concrete, alle-

viating the vapor pressure problem, but there is no indication that any wastes were removed. Indeed, the report indicates that "black oil" is still encountered here during drilling.

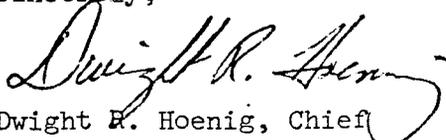
Before the Department will rule out the need for additional study in these five areas, we would like to review the ranking model, scoring data, and available sampling results which have led to your conclusion that further investigation of these sites is unnecessary. Following our evaluation of this data, additional comments will be provided.

In addition to the information already requested, the following information should be provided to this office two weeks prior to initiation of sampling or well drilling at the Naval Air Station:

- (a) A revised proposal detailing changes made in response to our comments and those of the RWQCB;
- (b) A map indicating proposed locations and depths of samples to be collected and of wells to be installed;
- (c) Methods to be used to collect, containerize, preserve and analyze samples (where not previously specified or where changes in the plan will occur);
- (d) A site safety plan indicating methods that will be employed to protect field personnel from hazards which may be associated with sampling or drilling in hazardous waste areas. Particular caution must be exercised in areas where the composition of waste materials is unknown or unpredictable (i.e., the landfills);
- (e) Names of firms that will be collecting and analyzing samples;
- (f) Laboratory quality assurance procedures to be utilized;
- (g) Dates and times when well drilling and sampling will occur, in order that we may arrange to have an observer present.

We appreciate the opportunity to review and comment on this proposal, and would be happy to meet with you and your consultants prior to initiation of field activities at this facility. If you have any questions concerning this response, please contact Julie Anderson of my staff at (415) 540-3143.

Sincerely,



Dwight R. Hoenig, Chief
North Coast California Section
Toxic Substances Control Division

cc: Ron Clawson
RWQCB, SF Bay Region 2

Paul Blais
U.S. EPA, Region IX

Gerald Winn, Director
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Gail Hom
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