N00217.000022
HUNTERS POINT
SSIC NO. 5090.3

STATE OF CALIFORNIA
GEORGE DEUKMEJIAN, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
1111 JACKSON STREET, ROOM 6040
OAKLAND 94607

Phone: Area Code 415
464-1255

December 22, 1986

File No. 2169.6052(TGR)

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:

Subject: Proposed Work Plan for PCB Contamination at Building 503, Hunters Point Naval Shipyard

The proposed work plan does not include any work to determine existing or potential ground water contamination with PCB resulting fom an alleged above-ground transformer spill in the past at the site. Our ground water contamination concerns were discussed by Theresa Rumjahn of this office with your staff and consultants at the December 8, 1986 meeting called by the Navy and held at the offices of the Department of Health Services (DOHS). We cannot review nor agree with any cleanup measures you propose until sufficient ground water information is provided both to the Board and to the DOHS. Therefore, the following information and work should be incorporated into the work plan and re-submitted to us for review:

1. The lateral and vertical extent of PCB and its "carrier" transformer oil in ground water should be determined prior to excavation. This information is essential to proper development of a soil and ground water cleanup plan and cleanup levels. ERM-West's October 1986 report provided no information on ground water contamination.

2. Subsurface pipelines and utility trenches (e.g. sewer lines, storm drain lines, and subsurface trenches for electrical, water and gas lines) should be thoroughly investigated to determine if they are possible conduits for PCB and transformer oil contamination. Cleanup plans for contaminated areas should be developed.

3. Based on site hydrogeological information and the extent of PCB and transformer oil contamination, the Navy should determine the potential for migration of PCB in ground water and via soil into uncontaminated ground water both during and after excavation for cleanup. We are particularly concerned that the Navy's proposed residual PCB levels of < 50 ppm in soil could lead to continued, widespread PCB contamination after cleanup.

4. Specific precautions for preventing runoff and increased infiltration of contaminated soils and liquids, particularly in heavy rainfall

events, during cleanup activities should be discussed in the work plan. We believe that the cleanup should take place during the dry season months (April to October) in order to avoid heavy rainfall events typical in the San Francisco area from December through February.

5. Detailed information on sampling and analytical procedures for PCB and transformer oil should be provided to the Board and the DOHS. We will evaluate the appropriateness of these procedures for contaminant screening and verification of cleanup levels prior to final approval of cleanup measures. We request a copy of the DOHS letter sent to ERM-West approving the PCB soil sampling procedures since we did not receive a copy following the December 8 meeting.

Finally, we reiterate that PCB in ground water and in soils that could affect ground water quality should not be present at levels above reasonable detection limits (0.5 ppb). However, we are willing to consider residual PCB levels in soil and in ground water which are consistent with DOHS soil cleanup requirements provided that the Navy demonstrates and can assure us that these PCB contaminants will not migrate from the site and impair present or potential beneficial uses of water resources. The "site" should be the area of cleanup.

We will provide timely review and comments on the revised work plan. If you have any questions, please call Theresa Rumjahn at (415) 464-1247.

Sincerely,

Laurence P. Kolb
for
ROGER B. JAMES
Executive Officer

cc: Bob Crandall, DOHS-TSCD
Greg Brown, NAVCOM, San Bruno
Dan Lent, PWC-Oakland