



DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY CA 94704

May 21, 1987

Commander Chris Guild
 Department of Navy
 Western Division
 Naval Facilities Engineering Command
 P.O. Box 727
 San Bruno, CA 94066-0720

Dear Commander Guild:

I would like to thank Greg Brown of your staff for providing Chein Kao of my staff with a site tour of the Hunters Point Naval Shipyard on May 12, 1987.

At the beginning of the tour, Mr. Brown submitted a report entitled " Hunters Point Naval Shipyard PCB Verification Sampling Results". This report describes the work which has been most recently conducted to remediate the PCB soil contamination in the Building 503 area. Based on our review of this report, we have several comments which are provided below.

DHS SPLIT SAMPLE RESULTS:

At the time of verification sample collection, five split samples were collected for independent analysis by the DHS Hazardous Material Laboratory. Comparison of DHS lab results with Central Coast Analytical Laboratory (Navy's contracted lab) results is as follows:

Sample I.D.	DHS results (ppm)	Central Coast results (ppm)
A1	35	4.9
C1	ND	1.1*
D2	5.2	1.1*
F1	5.4	2.1**
H3	20	3.6 (6.6***)

- * Composite of five sample points
- ** Composite of four sample points
- *** Duplicate discrete sample results

After discussion with both labs, it was determined that the discrepancy in the test results may have been mainly due to the difference in sample preparation procedures. Since

sample A1 is in the area where further cleanup is recommended by the report and H3 is below the cleanup level of 25 ppm for both lab results, the results reported by the Central Coast Analytical Lab are acceptable.

FIELD TEST KIT VS LAB DATA:

It was agreed upon by all parties involved in the work plan approval process that: (1) the McGraw/Edison field test kit would be used as screening tool only; and (2) verification of the cleanup level would be done by a certified laboratory. The report states that the field kit was used to determine the boundary of the spill. It further indicates that "vast number of field samples" were taken and that the field test kit is consistently more conservative than certified lab results. The report should contain a map showing the locations and readings of all field samples and a table which compares field test results and lab results for the same sampling points to substantiate this claim.

CONSISTENCY OF SAMPLING PLAN WITH EPA PROTOCOL

The report indicates that the number and location of sampling points are based on the EPA manual entitled "Verification of PCB Spill Cleanup by Sampling and Analysis". It further references Table 4 of the manual which indicates that 37 sampling points are required on a spill radius of 50 feet. However, the report indicates that only 21 samples were taken and suggests that field test data be used to substitute for the rest of the samples. As discussed in the above paragraph, verification samples should be analyzed by a certified laboratory. Therefore, sixteen more sampling points should be established and samples taken for lab analysis.

LOCATION OF SAMPLING POINTS AND CLEANUP BOUNDARY

The report indicates that samples from locations A1, B1, A2, and B2 exceeded the cleanup criteria and recommends that this area be further excavated. As a result, the Navy has proposed to relocate the boundary between Area 1 and Area 2. The report does not show the proposed new boundary. The report also does not indicate that a bench mark or reference point has been established to locate the boundary and each sampling point. We feel that bench marks and measurements are essential for the documentation of sampling points as well as for the delineation of the cleanup boundary.

Health and Safety Considerations

The soil cleanup level of 25 ppm for PCBs was based on the assumption that the area will be capped. Health and safety precautions which may be necessary to protect construction workers prior to the capping of the area need to be addressed.

We request that the above comments and all conditions laid out in the work plan approval letter dated February 18, 1987, be addressed in a revised report. Once these comments and conditions are adequately addressed, we believe that you will be able to move forward with construction activities in this area.

If you have any questions or comments, please contact Chein Kao of my staff at (415) 540-3052.

Sincerely,



Howard Hatayama, Chief,
Site Mitigation Unit
Toxic Substances Control Division
North Coast California Section

cc: Greg Brown Navy
Dan Schoenholz EPA
Bill Hurley RWQCB