

DEPARTMENT OF HEALTH SERVICES

1 BERKELEY WAY
BERKELEY, CA 94704

Captain Greenwald, Commander
Western Division
Naval Facilities Engineering Command
P.O. Box 727
San Bruno, California 94066-0720

July 27, 1987

Dear Captain Greenwald:

RE: PCB Cleanup in Building 503 Area - Area 1

We have reviewed your letter dated June 25, 1987, and an attached addendum to the "Interim Report, Hunters Point Naval Shipyard, PCB Verification Sampling Results, April 1987." Our comments on the letter, the addendum and the issues discussed in our letters dated January 27, February 18, and May 21, 1987, are provided below.

Issues discussed in our February 18, 1987 letter

- o We requested in our February 18, 1987 letter that all comments in our January 27, 1987 letter be addressed.

The following comments in our January 27, 1987 letter have not been adequately addressed:

- (1) We recommended that final cleanup of the Building 503 area be addressed and included in the Remedial Action Plan (RAP) for the entire shipyard.

The Navy has not indicated that they intend to do this.

- (2) We need to be advised in advance about the pertinent details for shipment of excavated material.

We were telecopied a summary of transportation data on February 27, 1987, indicating that excavated soil would be transported for three days (March 3 to March 5, 1987). We understand that the excavation and transportation of soil is still going on, yet the information provided in the February 27, 1987, summary has not been updated.

- (3) Pursuant to the comments from the RWQCB, we requested that potential groundwater and surface water migration routes be tested in order to determine if there has been any migration of the contaminants or if there is a risk of discharge of the contaminants into the Bay.

This work should be initiated as soon as possible.

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- (4) We requested that a thorough sampling/analysis plan for verification of clean-up levels be provided.

We have not received any sampling/analysis plan.

o Monitoring Program

The monitoring program will not prevent migration of contaminants. The earlier the monitoring program is implemented the sooner any mitigation measures which are necessary can be initiated. We disagree with the Navy's opinion that the monitoring program should not be implemented until the removal of PCB-contaminated soil is completed. The development of a preliminary work plan or the actual installation of monitoring wells in some areas can and should immediately proceed.

o Verification Sampling

We concur with the Navy's assessment that one area of the site has been cleaned up to the level that meets our conditionally approved criteria (25 ppm PCBs). However, the boundary shown in the report does not relate to any permanent mark and is not verifiable in the field. A new boundary should be defined with points based on permanent benchmarks.

o SIMA building description

This item has been adequately addressed.

o Deed Restriction

We agree that this item should wait until the completion of site remediation. However, it is important that a verifiable boundary is clearly defined and documented for later use in the deed restriction.

o McGraw-Edison PCB Test Kit

It is unclear to us how the kit can be calibrated with native soil which contains an unknown amount of PCBs or other chlorinated organic material.

Issues discussed in our May 21, 1987 letter:

o DHS split sample

You requested guidance from us on acceptable sample preparation protocols.

The Department's Hazardous Material Laboratory in Berkeley is responsible for establishing sample preparation and test protocols. Certified labs should follow these protocols closely. We would be glad to set up a conference call among you, HML and this office to clarify any questions you may have.

o Consistency of Sampling Plan with EPA Protocol

This item has been corrected in accordance with EPA sampling protocol "Verification of PCB Spill Cleanup by Sampling and Analysis".

o Location of Sampling Points

Two permanent benchmarks have been established. Measurements from each benchmark to three sampling points were obtained. Knowing that the grid spacing is 15 feet, the entire grid can be reestablished on-site if necessary. However, a clearer description of the benchmarks (instead of "PP") should be provided.

o Health and Safety Considerations

We wish to stress that the clean-up activities must comply with the previously approved Health and Safety Plan. The clean-up level was originally set assuming that the entire area would be covered by either an asphalt parking lot or a building. The health and safety of the construction workers associated with the SIMA building construction and their possible exposure to PCBs prior to the construction of the artificial cap is a concern. We urge the Navy to address this issue and consult with OSHA officials.

As you can see from these comments, we believe that many of our previous concerns have not been adequately addressed. We request that these issues be resolved as soon as possible so that we can move forward with the cleanup of areas 2 and 3 in the Building 503 area.

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

Sincerely,



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

cc: Alex Dong, Navy
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