

Transmitted Via Mail

August 24, 2004

Cecilio S. Felix
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, California 94612

Re: PCBs in Upland AOC U1
Upland Portion of Subunit 2B
Richmond Field Station, Richmond, California
BBL Project #: 24210

Dear Mr. Felix:

Blasland, Bouck & Lee, Inc. (BBL), on the behalf of the University of California Berkeley (UC Berkeley), submitted the report titled "Remedial Action Plan – Phase 3, Upland Portion of Subunit 2B, Meade Street Operable Unit" (RAP) to the California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) on July 13, 2004. As you may recall at a meeting on that date between the RWQCB and UC Berkeley at the Richmond Field Station (RFS), we discussed the RAP and the discovery of Polychlorinated Biphenyls (PCBs) in waste characterization soil samples from AOC U1. It was agreed that UC Berkeley would perform additional soil sampling to delineate the PCBs in AOC U1 shown on Figure 1. This letter discusses the results of that sampling.

On July 13, 2004, four surface soil samples were collected within AOC U1 from locations designated ES3-13 through ES3-16 and shown on Figure 2. The soil samples were analyzed by Curtis & Thompkins Laboratory in Berkeley, California for PCBs by EPA Method 8082. The results ranged from 0.9 mg/kg to 25.2 mg/kg.

On July 29, 2004, BBL personnel collected 26 additional soil samples from 19 locations shown on Figure 2. Four of the locations, designated ES3-14, ES3-16, ES3-20, and ES3-22, are within the AOC boundary. At these locations, samples were collected from the bottom of the planned excavation at depths of 1 foot and 3 feet bgs to evaluate the vertical extent of PCBs within the AOC. At the remaining 15 locations outside the AOC, samples were collected at each location from the surface to 6 inches below ground surface (bgs) and from 1 to 1.5 feet bgs at selected locations. These samples were also analyzed by Curtis & Thompkins for PCBs by EPA Method 8082.

Within the AOC, the samples from the bottom of the excavation ranged in concentration from 0.015 mg/kg to 0.105 mg/kg. Outside of the AOC, the concentrations ranged from below the detection limit to a maximum of 1.1 mg/kg, well below the 10 mg/kg human health site-specific target level (H-SSTL)

proposed in the risk assessment prepared for the RFS. In addition, we do not consider PCBs at concentrations below 3 mg/kg to be a risk to the upland ecological receptors previously evaluated in the risk assessment. The analytical results are summarized on Figure 2 and presented in Table 1.

The analytical results suggest that the planned remedial action in AOC U1, as discussed in the RAP, will sufficiently remove elevated concentrations of PCBs in this area. We believe that additional remedial measures are not warranted. If you have any questions, please call me at (925) 274-1100 x 14.

Sincerely,

BLASLAND, BOUCK & LEE, INC.



Bill Copeland
Senior Project Scientist

cc: Mike Hryciw, Capital Projects, University of California Berkeley
Anna Moore, Environment, Health and Safety, University of California Berkeley
Karl Hans, Environment, Health and Safety, University of California Berkeley
Mary Esper, URS Corporation
Patrick Schlesinger, UC General Counsel, University of California
File

TABLE 2
ANALYTICAL RESULT WITH SCREENING FOR PCBs IN SOIL
UPLAND SUBUNIT 2B
RICHMOND FIELD STATION

Upland Remedial Action Plan

Sample ID	Depth (Feet)	Date Collected	Total PCBs (mg/kg)	Aroclor-1016 (mg/kg)	Aroclor-1221 (mg/kg)	Aroclor-1232 (mg/kg)	Aroclor-1242 (mg/kg)	Aroclor-1248 (mg/kg)	Aroclor-1254 (mg/kg)	Aroclor-1260 (mg/kg)
Screening - H-SSTL			10	--	--	--	--	--	--	--
AOC U1 - Cap Co Explosives Storage Area										
ES3-14	3	7/29/2004	.016	<0.015	<0.029	<0.015	<0.015	<0.015	.016	<0.015
E33-16	1	7/29/2004	.017	<0.014	<0.028	<0.014	<0.014	<0.014	.017	<0.014
ES3-17	0	7/29/2004	.1	<0.013	<0.026	<0.013	<0.013	<0.013	.1	<0.013
ES3-33	0	7/29/2004	.020	<0.012	<0.025	<0.012	<0.012	<0.012	.020	<0.012
ES3-32	0	7/29/2004	.047	<0.013	<0.026	<0.013	<0.013	<0.013	.047	<0.013
ES3-32	1	7/29/2004	ND	<0.013	<0.026	<0.013	<0.013	<0.013	<0.013	<0.013
ES3-31	0	7/29/2004	ND	<0.013	<0.026	<0.013	<0.013	<0.013	<0.013	<0.013
ES3-31	1	7/29/2004	ND	<0.013	<0.026	<0.013	<0.013	<0.013	<0.013	<0.013
ES3-30	0	7/29/2004	.038	<0.013	<0.026	<0.013	<0.013	<0.013	.038	<0.013
ES3-29	0	7/29/2004	.024	<0.013	<0.026	<0.013	<0.013	<0.013	.024	<0.013
ES3-28	0	7/29/2004	.020	<0.013	<0.025	<0.013	<0.013	<0.013	.020	<0.013
ES3-28	1	7/29/2004	ND	<0.014	<0.027	<0.014	<0.014	<0.014	<0.014	<0.014
ES3-27	0	7/29/2004	.065	<0.013	<0.025	<0.013	<0.013	<0.013	.065	<0.013
ES3-27	1	7/29/2004	ND	<0.013	<0.027	<0.013	<0.013	<0.013	<0.013	<0.013
ES3-26	0	7/29/2004	.045	<0.013	<0.025	<0.013	<0.013	<0.013	.045	<0.013
ES3-24	0	7/29/2004	.065	<0.013	<0.026	<0.013	<0.013	<0.013	.48	.17
ES3-25	0	7/29/2004	.128	<0.013	<0.025	<0.013	<0.013	<0.013	.091	.037
ES3-25	1	7/29/2004	ND	<0.014	<0.028	<0.014	<0.014	<0.014	<0.014	<0.014
ES3-20	1	7/29/2004	.015	<0.013	<0.026	<0.013	<0.013	<0.013	<0.013	.015
ES3-23	0	7/29/2004	1.1	<0.063	<0.13	<0.063	<0.063	<0.063	.95	.15
ES3-23	1	7/29/2004	.207	<0.014	<0.028	<0.014	<0.014	<0.014	.17	.037
ES3-22	1	7/29/2004	.105	<0.014	<0.028	<0.014	<0.014	<0.014	.09	.015
ES3-21	0	7/29/2004	.78	<0.065	<0.13	<0.065	<0.065	<0.065	.67	.11
ES3-18	0	7/29/2004	.05	<0.012	<0.024	<0.012	<0.012	<0.012	.05	<0.012
ES3-19	0	7/29/2004	ND	<0.012	<0.025	<0.012	<0.012	<0.012	<0.012	<0.012
ES3-19	1	7/29/2004	ND	<0.013	<0.026	<0.013	<0.013	<0.013	<0.013	<0.013

