RUST ENVIRONMENT & INFRASTRUCTURE

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February 17, 1995

Post-it® Fax Note 7671	Date	# of pages ▶ 8
To Barney Chan	From Ed Alverson	
Co./Dept.	Co.	
Phone #	Phone #	
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Steve Krival, M.S.
Hazardous Substances Scientist
CAL-EPA, DTSC, Region 2
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

Dear Mr. Krival:

Subject: Response to Comments
Former American National Can Facility
Oakland, California
EPA Identification No. CAD 009 162 116

This letter responds to your letter dated February 15, 1995, wherein you requested citations to the Excavation and Sampling Plan, Supplement to the Draft Final Closure Plan, dated February 14, 1995, for the subject facility where items and deficiencies identified in your letter of February 11, 1995, as amended on February 14, 1995, are addressed. We trust that this letter will provide sufficient identification of those items that were addressed. Those items that were not addressed in our Supplement will be provided by February 21, 1995, as you requested. We also are taking this opportunity to respond to your verbal comments left on my voice mail the evening of February 16, 1995. We appreciate your expeditious review of our submittals and will endeavor to provide you with the information you need to approve our Plans.

Closure Performance Standards

"Excavations shall remove all soil contaminated to concentrations above these standards"
Figures 1, 1a and 2 show the proposed limits of excavation that are based on your performance standards and soil analytical results. Excavation to these limits will remove soil from all locations where the investigation samples had concentration(s) that exceeded performance standards, with the exception of soil in the vicinity of sample PB5.3 where organolead was detected at 0.77 ppm. Based on discussions about this sample with our toxicologist, Tim Markey, and DTSC toxicologist, Steve Dezio, it was our understanding that this sole detected concentration of organolead below the black clay layer does not constitute a potential threat to health or the environment and would not require excavation. However, we will collect additional samples from the vicinity of this location from the bottom of the excavation to confirm the existence of the organolead. If the organolead is found to exist we will excavate additional quantities of soil and collect additional post-excavation samples.

"Your closure plan must include adequate details on sampling and analysis procedures...."
Details of sampling procedures are provided on Page 1, Section 1.0, paragraph 2 of the Excavation and Sampling Plan. Additional details on sampling procedures will be provided by February 21, 1995. All complete laboratory analytical reports are included as Appendix A. An inadvertently omitted lab report was transmitted to you with a letter dated February 15, 1995. The laboratory has been requested to provide to the Department directly all notes, data sheets, and quantification sheets as well as descriptions of how samples were prepared.

"We call to your attention laboratory errors..." (Hexavalent chromium PQL)
Inchcape is currently re-reviewing their reporting limits for hexavalent chromium results and will submit to you their findings, as well as their calculation for determining the reporting limits.

Management of RCRA Structures

"If these structures are not adequately characterized.... ....they must be managed as hazardous waste."
Page 6, Section 3.2.1, first paragraph, last sentence and Page 7, Section 3.2.2, first paragraph, last two sentences specify that the concrete from both storage areas will be declared, managed and disposed of as both RCRA and California Title 22 characteristic hazardous waste for lead.

Soil Excavation

"It is our understanding that ANC intends to confirm the extent of contamination during excavation. The procedure by which this is to be accomplished must be clearly described in your closure plan."
The procedure by which ANC intends to confirm the extent of contamination during excavation consists of: 1) excavating soil that has been shown to exceed performance standards or clean up levels; and 2) collecting an adequate number of post excavation samples to confirm that soil that exceeded the clean-up levels has been removed; and 3) repeating steps 1 and 2 if necessary until confirmation has been achieved. Page 6, Section 3.2.1 and Figures 1 and 1a provide a detail of materials that exceed clean-up standards in the Drum Storage Area (DSA) and Page 7, Section 3.2.2 provides a detail of materials that exceed clean-up standards in the SDSA. Section 4.0 provides a detailed post-excavation sampling plan.

"This description must include a soil sampling confirmation workplan which contains a plan view and cross-sections showing exact areas to be sampled in the floors and walls of the excavations."
Figures 4 and 5 of the Excavation and Sampling Plan provide a plan view showing the proposed locations of the post excavation sampling locations in the SDSA and DSA respectively. Cross sections showing post excavation sampling locations were not provided in the Excavation and Sampling Plan because only one (composite wall sample in the deeper area of excavation around

investigation borings PB-3 and PB-3d) of the twenty three post excavation samples was proposed to be a wall sample and the rest were to be floor samples. However, you have subsequently requested that wall samples be collected in the DSA excavation (described below) and therefore, cross sections showing post excavation sample locations will be provided by February 21, 1995.

"The workplan shall include the number of confirmation samples..."
Page 12, Section 4.3, paragraphs 3 and 4 describe the number of post excavation samples to be collected in the DSA and SDSA respectively. This brings to our attention that a late revision to the Excavation and Sampling Plan to add a second post excavation sample in the SDSA where 0.49 ppm of hexavalent chromium was detected in sample SDSA SH1 was incorporated into Figure 2, but not into the text (Section 4.2, first sentence and Section 4.3 - 3rd paragraph).

"*...and exact locations,...*"
Figures 5 and 6

"*...specific test methods,...*"
Page 13, Section 4.4

"*...sampling procedures...*"
Not included in Excavation and Sampling Plan. Will be provided by February 21, 1995.

"*...and schedule of activities.*"
Not included in Excavation and Sampling Plan. Will be provided by February 21, 1995.

"*Your closure plan should clearly document the known extent of contamination in the two areas. This must include:*"

- "*Plan and cross sectional views showing the extent of excavation.*"
  The "proposed extent of excavation" dashed lines of Figures 1, 1a and 2 equate to the extent of contamination.
- "*Contour concentration maps for each contaminant of concern*"
  Not included in Excavation and Sampling Plan. Will be provided by February 21, 1995.
- "*Plan and cross sectional views of the areas which it is now known must be excavated and estimates of the volumes of soil to be removed.*"
  Figures 1, 1a and 2 provides limits of excavation and the table in Section 3.4 on Page 9 provides an estimate of the volume to be excavated.

Storage of Structures and Soils

"*All excavated contaminated materials must be stored on site until the Department formally approves ANC's closure plan.*"

Page 8, Section describes the Roll-off Storage Bin Area. Page 9, Section 3.4, paragraph 3 describes storage of roll-off bins in the roll-off storage bin area until the CEQA permits off-site disposal.

"*A plan for storage....must include such information as:*"

- "*A plan drawn to scale showing the locations and extent of the storage area.*"
  Figure 3 of the Excavation and Sampling Plan is a scaled Site Plan which shows the locations/extent of the roll-off bin storage area.

- "*Description of means for excluding the public and casual workman from the area and of warning sign posting.*"
  Page 8, Section 3.3.2, Last sentence specifies that the entire storage area will be enclosed within a locked chain link fence. The Excavation and Sampling Plan does not specify the posting of warning signs. Please note that warning signs (minimum of 4) will be installed on the chain link fence.

- "*Description of means for controlling wind dispersion of soils.*"
  Page 8, Section 3.3.4 describes measures to control dust during excavation activities. Page 9, Section 3.4, paragraph 3, Sentence 3 specifies that each roll-off will be covered with a tarp to control dust emissions.

- "*Description of means for controlling storm runon and runoff from the area.*"
  Page 8, Section 3.3.2 specifies that the storage area will be bermed and lined with plastic.

- "*Description of containers to be used for storage. These should be water tight.*"
  Page 9, Section 3.4, paragraph 3, sentence 2 specifies that each roll-off will be lined with plastic (watertight).

Other Information for Closure Plan

Excavation Plan Submittal Dated February 9, 1995
NOTE: The excavation plan submitted to you was a Draft version for you to develop a preliminary understanding of our approach to storage of excavated materials.

"*Modify health and safety plan to protect for dermal exposure to organolead, and inhalation exposure to semi-volatile and volatile organic compounds.*"
Not included in Excavation and Sampling Plan. Will be provided by February 21, 1995.

- "*Section 1.2:*" *(Water-tight containers)*
  Page 9, Section 3.4, paragraph 3, sentence 2.

- *"Section 1.3:" (Chemical Analysis of wastewater)*
  Page 8, Section 3.3.3 states that the wastewater will be chemically analyzed but does not specify the analytical methods. Wastewater will be analyzed pursuant to methods specified in your January 16, 1995 memorandum.

- *"Excavation:" (Storage of groundwater encountered during excavation)*
  Page 10, Section 3.4, paragraph 3 describes why groundwater will not be encountered during excavation. Therefore measures to store and test groundwater are not needed.

- *"Section 3.1:" (Clean Fill Excavation and Stockpiling)*
  The referenced figures were included in the Excavation and Sampling Plan (Figures 1, 1a and 2).

Drum Storage Area

- *"Description of what has been done to verify the hit of organic lead in PB 5.3"*
  Verification of this result was not provided in the Excavation and Sampling Plan. Inchcape has informed us that they have a 95% confidence level in the sample result. We have instructed them to review their raw data from the sample and forward to you a statement of their findings. We have proceeded with the belief that this sample result is valid. We have reviewed this sample result with your toxicologist, Steve Dezio, and have concluded that this sole detected concentration of organolead below the black clay layer does not constitute a potential threat to health or the environment. However, we will collect additional samples from the vicinity of this location from the bottom of the excavation to confirm the existence of the organolead. If the organolead is found to exist we will excavate additional quantities of soil and collect additional post-excavation samples.

- *"Results of any total chromium analysis on any of the HS samples."*
  With the exception of SH3 and SH7 in the SDSA, the SH samples were only analyzed for hexavalent chromium, not total chromium. The total chromium data for these two samples is provided in summary Tables 2, 3 and 4. Based comments you provided to RUST and P.E.S. Environmental personnel in the January 24, 1995 project meeting, it was our understanding that total chromium would be tested for only if hexavalent chromium were detected.

- *"A cross section is needed through PB 9, DSA-HA 9a."*
  Not included in Excavation and Sampling Plan. Will be provided by February 21, 1995.

- *"Results of HS samples run for VOCs & TPH..."*
  Page 2, paragraph 4 provides reasoning that the perimeter (HS) samples in the DSA were

analyzed for TPH but not for VOCs or SVOCs. Page 3, paragraph 4 provides reasoning why the perimeter (HS) samples in the SDSA were not analyzed for VOCs or TPH.

- *"Where confirmation soil samples will be taken. This shall include soil samples under the concrete along cross section D-D'."*
  Figure 5 of the Excavation and Sampling Plan provides a plan view of post excavation sampling locations in the DSA.

Solder Dross Area

"Analytical results for VOCs and TPH on all soil samples."
Not all samples were analyzed for VOCs and TPH as described above. Analytical results for all samples collected and analyzed are included in the Excavation and Sampling Plan.

The remainder of this letter provides responses to comments you forwarded to me in two voice mail messages on February 16, 1995, at approximately 7 p.m. Eastern time.

Post excavation sampling and analysis plan

You stated that it was not clear what we mean by grab sample, and that you do not want us collecting grab samples because we will loose volatiles.
Grab samples (the type of all post-excavation samples we propose to collect) are discrete aliquots of soil that are representative of one location (i.e.; one sample per one location), not grabbed from the surface. Page 12, Section 4.3, sentence 2 states that they will be from a depth of 6-12 inches below the excavation surface. This demonstrates our intent to collect all post excavation samples from undisturbed soil. Samples will be collected with a proper sampling device (stainless steel liner driven into undisturbed soil).

DSA
You stated that we must collect post excavation samples in the wall of the DSA excavation.
We had not intended to collect wall samples around the perimeter of the DSA excavation. Reasoning for this was presented on Page 12, last paragraph. However, we understand your concern that the HS series samples were not analyzed for VOCs. Therefore, we agree to collect wall samples (one per 20 lineal feet of wall should be adequate) around the perimeter of the DSA excavation as you requested.

You ask that all analyses be performed on all post-excavation samples, including the analytes for which we have established performance standards and for the VOCs we missed before.
Page 13, Section 4.4 of the Excavation and Sampling Plan specifies that **all** post-excavation samples will be analyzed for "volatile organic compounds by EPA SW-846 Method 8260 with a

library search for tentatively identified compounds, EPA Method 8270 with TICs, TPH as Diesel (Cal DHS Method), TPH as Mineral Spirits (Cal DHS Method), and Organo-lead (Cal DHS Method). The inorganic analytes to be tested for will include: total lead and total zinc by EPA Method 6010 and hexavalent chromium by EPA Method 7196A".

You stated that there are to be no composite wall samples.
The 4 sample locations shown on Figure 5 of the Excavation and Sampling Plan will be collected and analyzed as discrete individual samples as you have requested, not composite samples as proposed.

SDSA
You ask that 11 post excavation samples be collected in the SDSA.
We proposed to excavated two small areas of soil in the vicinity of samples SH1 and SH6. We understood that previous sampling was adequate to determine that soil beneath the concrete pad would not have to be excavated, so we do not see the need for collecting post excavation samples of that material. We would like to discuss further with you the need to collect and analyze 11 samples in the SDSA.

You ask that all samples be all analyses be performed on all post-excavation samples, including the analytes for which we have established performance standards and for the VOCs we missed before.
Please refer to Page 13, Section 4.4 of the Excavation and Sampling Plan. We propose to analyze all post-excavation samples for all analytes for which we have performance standards, including all VOCs.

At the end of your second message, you state that because of the gaps in data, we should just excavate down to 9 feet in the DSA and a foot or two down in the SDSA to assure clean closure. You specify gaps in data including organics and hexavalent chromium.
We do not believe we have substantive data gaps that would prevent excavation and removal of all contaminated soil that exceeds performance standards, to be confirmed by post-excavation sampling and analysis.

Following my conversation with Rob Creps wherein he passed on to me comments given to him by you, I reviewed our submittals and realize that we neglected to provide you with summary tables of alcohol analyses performed on SDSA samples collected in October 1994. These tables will be provided on February 21, 1995, along with our other submittals. These tables will show that alcohols were not detected in samples collected from PB-10, PB-11R, PB-12, and PB-13. The laboratory analytical reports for these analyses were included in Volume 2 of the December 8, 1994, report entitled, "Analytical Results, RCRA Storage Areas Closure" submitted to you on that date.

Please call me with further comments or questions.

Very truly yours,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

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