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Mr. Marshall Cloud
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CONCURRENCE WITH THE DRAFT FINAL REMEDIAL ACTION REPORT FOR THE NORTHERN DEPOT AREA DEFENSE SITE ENVIRONMENTAL REPORTING AND TRACKING SYSTEM (DSERTS) 67 COVER INSTALLATION FOR DEFENSE DISTRIBUTION DEPOT SAN JOAQUIN CALIFORNIA (DDJC)-TRACY SITE, TRACY, CALIFORNIA

Dear Mr. Cloud:

The Department of Toxic Substances Control (DTSC) received the above-mentioned report on June 29, 2004. The report discusses the post Record of Decision (ROD) remedial action activities related to DSERTS 67.

History

DSERTS 67 site was used as a storage area for the National Stockpile of Strategic Metals between the early 1940s and mid 1980s. This site was used to store ferrous chromium ore until the 1980s, and was used to store lead ballast until 1986. Manganese ore was also stored at DSERTS 67 until the 1970s.

Remedial Actions

The selected remedy in the ROD was to construct an asphalt cap approximately 138,000 square feet for the protection of onsite workers; specifically, to protect grader operators from elevated levels of arsenic and manganese in dust. On July 22, 1999, a DDJC-Tracy Remedial Project Managers meeting concluded that the ROD-required asphalt cover was overly conservative based on future land use and limited exposure scenarios of grader operators and onsite workers. Alternative remedies were evaluated and an Aggregate Base (AB) cover was selected as an equivalent ROD-required remedy. A design data collection effort was conducted in 2001 to define the lateral

extent necessary for the AB cover. The results from the data collection effort indicated that a smaller area, approximately 63,500 square feet of AB cap, would be required to protect human health and the environment. The approximate size of the DSERTS 67 was estimated to be 138,000 square feet in the ROD without any survey data. The site was professionally surveyed on May 24, 2003, and indicated a smaller area of 101,200 square feet for DSERTS 67. The survey also showed that 88% of the DSERTS 67 area is covered by structures related to the Operable Unit 1 ground water treatment system, existing asphalt pavement, railroad lines, and by a layer of AB. The remaining 12% of DSERTS 67 is covered by grass and provides protection from dust generation.

Revised DSERTS 67 Cleanup Standards

The ROD listed the cleanup standards of arsenic and manganese at 48 µg/kg and 1,000 µg/kg, respectively. A check of the data and calculations used to derive the DSERTS 67 ROD cleanup standards showed the exposure point concentrations in mg/kg, not µg/kg as they were intended to be. This oversight resulted in a less conservative cleanup standard for manganese to protect onsite workers. The revised cleanup level for manganese at DSERTS 67 is now documented as 812 mg/kg in both of DDJC-Tracy's Explanation of Significant Differences (ESD).

Institutional Controls

Institutional Controls that are currently in place at DSERTS 67 are documented in both of the DDJC-Tracy's ESDs, and include the following controls to protect grader operators, onsite workers, and human health and the environment:

- Signs to warn grader operators or construction workers that all excavation and construction projects require the approval of the DDJC-Tracy Facilities Engineer and Environmental Management;

- Notifications to the regulatory agencies prior to the removal and or modification of the cover, which constitutes disruption of the selected remedy, and follow-up activities to ensure that the controls are fully restored;

- Annual Inspections and maintenance of the cover (ESD), to prevent the potential exposure of grader operators or construction workers to elevated concentrations of arsenic and manganese in surface and near-surface soils; and

- Land use restrictions to prevent schools, playgrounds, hospitals, or housing from being built until the contaminants of concern are below levels of unrestricted land use.

Specific Comments

Please specify in section 6.3 of the DSERTS 67 Remedial Action Report if the proposed warning signs for on-site workers are currently in place or planned for the future. The 2004 Final ESD to the Sitewide Comprehensive ROD, figure 6-1, indicates a total of three signs placed along both the northern and southern sides of DSERTS 67.

Conclusion

DTSC concurs with the determinations made in the Draft Final Northern Depot Area (DSERTS 67) Cover Installation for DDJC-Tracy.

If you have any questions or comments regarding this letter, feel free to contact the Project Manager, Mr. Peter MacNicholl at (916) 255-3713 or e-mail pmacnich@dtsc.ca.gov.

Sincerely,

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Chief
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cc: See next page.

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