Appendix J-7

Leighton Responses to Comments

VISTA ENVIRONMENTAL CONSULTING

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April 29, 2024

Brynn McCulloch, PG
Western Environmental Practice Leader
Leighton Consulting, Inc.
2600 Michelson Road, Suite 400
Irvine, CA 92612

Subject: **PCB Sampling – Response to Public Comments**
March Air Force Base, Former Ordnance Storage Area / Weapons Storage Area, Riverside, CA.

Dear Ms. McCulloch,

In response to your request, the following further clarification is provided.

Response to updated comments from Linlin Zhao (Comment Letter RI-290) on 26 February 2024 regarding Polychlorinated Biphenyl (PCB) Sampling.

Mr. Zhao's fifth comment, under the heading "Deficiencies in polychlorinated biphenyls (PCB) analysis," is predicated on the fact that we were assessing a known PCB contaminated item. The section he cited for the requirements to test concrete as a porous surface (40 CFR 761.78) is the decontamination standards and procedures portion of the United States Environmental Protections Agency's (USEPA) primary TSCA standard for PCBs. The requirements of this section presuppose that there has been a release of a PCB product (in this case, transformer oil) containing PCBs at concentrations of 50 mg/kg, a fact that was not established.

As was stated in our original responses, wipe sampling was a reasonable initial testing method for concrete surfaces with discoloration, even if the contamination had occurred more than 72 hours ago. In the event that there had been any PCBs detected in any of the subject wipe samples collected of discoloration on concrete pads, then it would be reasonable to assume that there had been a release of PCB-containing oil, and further assessment of the concrete and the soil beneath the concrete would be warranted. The fact that there was no PCB detected in the surficial contamination is indicative of the fact that there never had been a release of transformer oil containing PCBs at concentrations of 50 mg/kg, and therefore there was no need to perform testing of the concrete or the soil below.

Mr. Zhao's sixth comment under the heading "Critical errors in conclusion regarding hazardous materials found in wood communication poles," indicates a misunderstanding regarding the standards that apply to treated wood waste (TWW). In fact, he is trying to compare dry weight testing results (reported as mg/kg) to the RCRA wet extraction standards (expressed as mg/L) for determining toxicity, which would require the wood poles by treated as RCRA waste, rather than TWW waste.

Following the results that Mr. Zhao cites (11 mg/kg for Arsenic and Pentachlorophenol results of 510 mg/kg to 1,700 mg/kg), the RCRA-required wet extraction testing required in 40 CFR 261-268 was performed. The follow-up testing results indicated:

1. Sample TW-2, which expressed Pentachlorophenol at 710 mg/kg, was not subjected to the TCLP extraction for comparison to RCRA standards because Samples TW-3 and TW-9, summarized below, were determined to contain seven to nine ten times the concentration of Pentachlorophenol as Sample TW-2.
2. Sample TW-3, which expressed Pentachlorophenol at 6,400 mg/kg, the highest result for Pentachorophenol, was subjected to the TCLP extraction for comparison to RCRA standards. The result was 0.66 mg/L, significantly below the RCRA standard of 100 mg/L that Mr. Zhao correctly cited.
3. Sample TW-9, which expressed Pentachlorophenol at 5,200 mg/kg, the second highest result for Pentachorophenol, was subjected to the TCLP extraction for comparison to RCRA standards. The result was 1.7 mg/L, again significantly below the RCRA standard of 100 mg/L.
4. Sample TW-10, which expressed Arsenic at 11 mg/kg, one of the only positive results for Arsenic, was significantly below the industry standard to perform the TCLP extraction for comparison to RCRA standards. The USEPA's recommendation for performing a TCLP analysis is 100 mg/kg, while the California DTSC recommendation for performing additional analysis for Arsenic is 50 mg/kg, though this standard would not apply to TWW, in particular, which is regulated separately from other types of waste, in accordance with California Health and Safety Code Section 25230, et al.

Please note that the industry standard, based upon Cal/DTSC and USEPA guidelines, is as follows:

1. If the number associated with the dry standard results (expressed in mg/kg) is less than ten times higher than the State of California's wet extraction toxicity standard (STLC, expressed in mg/L), and less than twenty times higher than the RCRA wet extractions toxicity standard (TCLP, also expressed in mg/L), no additional testing or analysis is required. The applicable wet extraction standard for Arsenic (5 mg/L), Chromium (5 mg/L) and Pentachlorophenol (100 mg/L) mean that any result of less than 50 mg/kg for Arsenic and Chromium and any result of less than 1,000 mg/kg for Pentachlorophenol do not require additional analysis.

2. If the number associated with the dry standard results (expressed in mg/kg) is ten times higher than the State of California's wet extraction toxicity standard (STLC, expressed in mg/L), the STLC extraction and analysis is required. However, since the testing performed was for Treated Wood Waste (TWW), which has its' own standard in California, promulgated by Assembly Bill 332 and codified in California Health and Safety Code Sections 25230 to 25230.18, which specifically allows TWW to be handled under alternative management standards which specifically exempt TWW from the TTLC (dry) standards found in 22 CCR 66261.24(a)(2)(A) and the related STLC standards, as long as the TWW is managed in accordance with the cited Health and Safety Code sections and is not a RCRA waste.

3. If the number associated with the dry standard results (expressed in mg/kg) is twenty times higher than the RCRA wet extraction toxicity standard (TCLP, expressed in mg/L, associated with the RCRA "D" codes), the TCLP extraction and analysis is required. Samples TW-3 and TW-9 were subjected to the additional TCLP extraction and analysis, under these guidelines, and both samples were found to exhibit extractable Pentachlorophenol at levels which were orders of magnitude lower than the RCRA standard of 100 mg/L.

As a final note, the wet extraction results can and do vary, based upon the individual samples that are analyzed. As an example, the fact that the TCLP result for Sample TW-3 was 0.66 mg/L and the TCLP result for Sample TW-9 was 1.7 mg/L, even though the dry weight result for Sample TW-3 was approximately 20% higher than Sample TW-9, is not a QA/QC issue, but is related to the characteristics of the individual samples. Reasons for this variation could be as varied as the wood in one pole being more dense and therefore having the Pentachlorophenol adhering to it better than the second pole, or one having had the Pentachlorophenol dipped longer before installation, and therefore penetrating deeper into the wood, making it harder to extract during the TCLP process.

Response to updated comments from Mike McCarthy (Comment Letter RI-254) on 23 February 2024 regarding sampling procedures.

Comment R-254.155 states, based on laboratory QA/QC results, the PCB data provided in Appendix J-2 should be considered invalid because laboratory-conducted QA/QC did not fall within acceptable limits, and PQLs were higher than residential screening levels for PCBs in soil.

With respect to the PQL, the samples were collected on buildings scheduled for demolition, and therefore wipe samples were used to characterize material for disposal in accordance with 40 CFR 761 (see page 15 of 37, Appendix J-2). 40 CFR 761.61 outlines requirements for cleanup and disposal of PCB remediation waste, including porous surfaces (concrete). 40 CFR 761.61(a)(4)(iii) states the cleanup level in high occupancy areas is 1 ppm, while low occupancy areas is 25 ppm. The lab PQL of 490 parts per billion (ppb) is equal to 0.490 ppm, which is below the applicable screening level used in this evaluation.

With respect to QA/QC, all quality control results were within in-house limits, as well as the limits of the analytical methods employed (USEPA Methods 8082 and 9270), and no qualifiers were identified in the lab report that indicated unacceptable results.

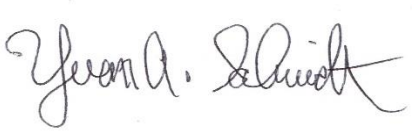
Comment R-254.156 states, based on laboratory QAQC results, PAH data provided in Appendix J-2 should be considered invalid because surrogate recoveries and matrix spike recoveries were unacceptable. The referenced data is in Appendix J-6, which was collected to characterize materials for disposal. While data quality issues were identified, these materials are scheduled to be removed from the project site. The report determined materials that contain PAHs (power poles) are to be handled and disposed of as Treated Wood Waste (TWW) under California HSC 25230 through 25230.18. Materials in question that contain PAHs will be removed and disposed of in accordance with state law.

Comment R-254.157 states that Appendix J-6 pentachlorophenol measurements were above residential and industrial soil RSLs. As noted in Response R-254.155, wood poles were tested for removal and disposal, and are to be handled as TWW under HSC 25230 – 25230.18. These do not represent concentrations in soil.

Comment R-254.158 states that chromium testing in Appendix J-6 did not speciate chrome III and chrome IV, and therefore chrome IV could be above residential soil RSLs. As noted in Response R-254.155, wood poles were tested for removal and disposal, and are to be handled as TWW under HSC 25230 – 25230.18. These do not represent concentrations in soil.

If you should have any questions regarding this matter, or if I can be of further assistance, please feel free to contact me on my mobile at 714.746.7644.

Respectfully submitted,
Vista Environmental Consulting



Yvan A. Schmidt
Senior Project Manager

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Senior Project Manager

Experience

Mr. Schmidt has acquiring extensive experience while working in the environmental field since 1988. Mr. Schmidt has been involved in a wide variety of environmental disciplines. He has served as the project manager on literally thousands of hazardous materials surveys, including educational facilities, commercial, industrial, military, and municipal. In addition to providing abatement design and project management oversight during the hazardous materials abatement (more than 100 full-floor high-rise projects). Mr. Schmidt also is experienced in performing indoor air quality assessments, hazardous waste management and chemical lab packing, industrial hygiene, biological and source emissions testing. During his career he has served as the laboratory manager for a NVLAP- and Cal/ELAP-accredited asbestos laboratory, and recently was the International Environmental Health and Safety Service Line Leader for a multinational corporation.

Proposed Responsibility

Senior Project Manager

Education

BA in History, UCLA, 1994
Hazardous Materials Management Certificate, Northrop Univ. 1992

Certifications

Cal/OSHA Certified Asbestos Consultant (CAC) #05-3791
CDPH Lead-Related Construction Inspector/Assessor, Project Monitor, Designer #2975
Previously USEPA-certified for Radon Testing (program expired)

Training

OSHA 40-Hour Hazardous Waste Operations and Emergency Response (HAZWOPER)
NIOSH 582-Sampling and Evaluating Airborne Asbestos Dust
Confined Space
Rocketdyne Safety Training: Radiation, Sodium & Radioactive Materials Disposal Facility
AHERA Asbestos:
-Building Inspector
-Management Planner
-Contractor Supervisor
-Project Designer
Lead Training:
-NITON XRF Spectrum Analyzer and Radiation Safety
CPR & First Aid

Other

Medically-approved and fit-tested for use of respirator
DOJ/DOD fingerprinting clearance for airports, military bases and school districts

Joined Firm

2014

Started in the Industry

1988

Universal Studios, Hollywood

- Served as project manager for more than 90% of all construction-related environmental consulting for thirty years, averaging approximately 100 projects per year over that period.
- Managed hazardous materials assessments and abatement projects for several off-site locations, including broadcasting facilities, warehouses and individual television and radio stations.
- Managed and performed site-wide asbestos-containing materials investigation and assessment of over 400 buildings.
- Wrote the original asbestos management plan for the facility.
- Managed response 1994 Northridge Earthquake after original project manager was removed.

Laboratory Manager, CTL Environmental Services, South Gate, California

- Managed a NVLAP-accredited laboratory that provided Phase Contrast Microscopy (PCM), Polarized Light Microscopy (PLM) and Transmission Electron Microscopy (TEM).
- Lab was in transition at the time, with chemistry lab moving to a new location and taking the Cal/ELAP accreditation with them.
- Managed the laboratory for more than a year, during which time all hazardous waste from prior chemistry lab operations were removed, new Cal/ELAP accreditation was acquired and the existing NVLAP accreditation was expanded from PLM only to PLM and TEM.

International Service Line Leader, GHD

- Served as international service line leader for industrial hygiene and auditing service line within the environmental department for GHD, an Australian multinational with locations all around the world.
- Responsibilities included providing technical and proposal assistance for offices across Australia, the United States, Chile, China, the Middle East and portions of Europe.
- Major accomplishments included renewing NATA accreditation to perform asbestos consulting in Australia, continuation of writing environmental regulations for Environment Abu Dhabi (EAD) and assisting multiple projects related to the 2022 World Cup in Qatar.

College of the Desert, Bldg. C and HILB Modernization, Palm Desert, California

- Took-over project from another consultant that had identified PCBs, but could not get USEPA approval of a work plan.
- Prepared PCB remediation work plan, which was approved by USEPA, Region IX, on the first attempt, then performed air sampling and remediation monitoring, including clearance wipe sampling. EPA accepted the closeout report, and Vista now performs triannual PCB air monitoring.
- Upon contractor exposing asbestos-cement water pipes, prepared Procedure 5 Work Plan, approved by SCAQMD on first attempt, and monitored removal of subject asbestos-cement pipe.
- Have since completed two additional PCB assessments and received approval from the USEPA for a second PCB remediation work plan.

Long Beach Community College District, Various Campuses, California

- Assessed a total of six buildings for hazardous materials on the Pacific Coast Campus. Three of those six sites went to construction, for which specification sections for hazardous materials removals were prepared, and abatement monitoring, related testing and clearance testing were performed. This included preparing PCB remediation work plan, which was approved by USEPA, Region IX. Currently performing air sampling and remediation monitoring, including clearance wipe and soil sampling.
- Assessed a total of seven buildings for hazardous materials on the Pacific Coast Campus. Five of those sites, including MDAB, for which abatement lasted over a year, went to construction, for which specification sections for hazardous materials removals were prepared, and abatement monitoring, related testing and clearance testing were performed.
- Dentistry School – Performed survey of two-story commercial building and prepared specification for gutting and renovation into a dentistry school; services included monitoring and clearing abatement.

San Bernardino Community College District

- San Bernardino Valley College, North Hall, Phase II – Demolition.
- San Bernardino Valley College, Chemistry Building – Chemical clean up and demolition monitoring.
- San Bernardino Valley College, Physical Science Building – Demolition.
- San Bernardino Valley College, Men's and Women's Gymnasium's – Hazardous materials survey's and abatement specifications for demolition.
- Crafton College, Library – Demolition.
- Crafton College, Chemistry, Biology, Microbiology and Anatomy – Performed chemical lab packing and move of five departments, including four departments listed and a paramedic training department, to the new Science Building.

University California, Los Angeles (UCLA)

- Royce Hall - Earthquake repair and seismic upgrading of historical landmark.
- Haynes Hall, Powell Hall and Moore Hall – Seismic upgrade.
- University Research Library – Amosite ceiling replacement - Abatement monitoring.
- Knudsen Hall - Amosite ceiling tile replacement throughout 8-story building - Abatement monitoring.
- School of Dentistry – Renovation of 2 floors – Abatement monitoring.
- HANX Hospital Annex – Survey and demolition monitoring.