From:	FitzGerald, Shannon (Federal)
To:	Shawn Jensen (sjensen@altasea.org)
Cc:	Bansal, Shalini (Federal); Marshall, Wilfred (Federal); Chekouras, Katherine (Federal)
Subject:	discrepancy in sampling results for PCBs
Date:	Thursday, June 16, 2016 1:45:48 PM

Hi Shawn,

I found the documents that I mentioned earlier that contain information about PCBs being present. At first the information appeared conflicting, but reading back through the documents, it appears that Aroclor 1254 and/or 1260 was detected in the galbestos siding but not in the soil adjacent to the buildings. Could you have Waterstone Environmental, Inc. confirm that?

Regarding the documents, the *City Dock No. 1 Phase I EA, San Pedro (Lost Angeles), CA* report by Waterstone Environmental, Inc., Project 13-129 notes that "Elevated concentrations of Aroclor 1254 and/or 1260 were detected in the siding samples from Berths 57 through 59" and "Asbestos (specifically chrysotile) was detected at concentrations as high as 55% in the samples collected at Berths 58 through 60." "In general, the results of laboratory analysis are consistent with the conclusion that the outside side material is galbestos." The report noted that "additional samples need to be taken to properly characterize the BCB and asbestos content of the siding material. In addition, wipe sampling should be performed on the galbestos siding to determine whether PCBs within the material have migrated to the surface of the material." The report cites a U.S. Army Corps of Engineers' report that indicates that "At other facilities which have used galbestos, it has been shown that the PCBs have leached from the galbestos siding material and impacted the soil around the building." The report recommended that soil sampling around the building be conducted.

A February 26, 2014 report by the Freeman Group, Inc. entitled *2500 South Signal Street berths 58-60 Port of Los Angeles, CA,* noted that "Test results revealed particular materials were found to contain asbestos, which included the exterior metal panels (Galbestos)…."

On September 9, 2014, Waterstone Environmental, Inc. issued the report *The Environmental Investigation at Berths 58 through 60*, which indicated that "No PBs were detected in any of the collected and analyzed soil samples." The report also noted that 'The asbestos identified in the interior floor tile of Berth 58 and exterior galbestos siding of berths 58 through 60 is considered damaged but non-friable."
While the asbestos in the galbestos siding was non-friable, it appears that the asbestos in the roof material of Berth 58 is friable. Was any asbestos detected in the soil adjacent to the building? Our concern here is that if 692 cubic yards of soil is going to be disturbed and 151 cubic yards of soil will be moved off-site, we want to make sure that the soil that is adequately characterized and properly disposed of. If there is asbestos in the soil that will be moved, what precautions will be taken to protect human health?

The report also noted that the soil in the area of Samples 60EB-2-0.5 and 60 EB-2-3 of the Subject Property may be characterized a non-RCRA (California) hazardous for disposal purposes only. Will this soil be removed or left on-site?

Thanks, *Shannon*

Shannon FitzGerald, Regional Environmental Officer
U.S. Dept. of Commerce, Economic Development Administration
915 Second Avenue, Room 1890, Seattle, Washington 98174
Phone: 206-220-7703 Fax: 206-220-7657
sfitzgerald@eda.gov