UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

OCT 0 8 2015

Via Certified Mail No. 7001 0320 0002 0253 7310
Return Receipt Requested

Melisa Cohen
SHEC Director, West Region
Sims Metal Management
600 South 4th Street
Richmond, CA 94804

Dear Ms. Cohen,

Thank you for your draft Sediment Sampling and Analysis Plan (SSAP), including the required Quality Assurance Project Plan (QAPP) prepared by Sims Group USA Corporation (Sims) consultant, Terraphase Engineering, dated March 1, 2015, and hereafter referred to in combination as the "draft SSAP." Sims provided the draft SSAP in accordance with Section V, Paragraph 12, of the Consent Decree between USEPA and Sims, entered on December 1, 2014.

We appreciate the demonstrable effort made by Sims and Terraphase Engineering to submit a reasonable and approvable SSAP. However, upon review the draft SSAP requires revision, and therefore is disapproved per Section V, Paragraph 14 of the Consent Decree. In summary, the draft SSAP's investigation inherently needs to be iterative and adaptive based on forthcoming sampling results. We have outlined necessary revisions below.

Sampling Methods

1. Sims proposes to use a Ponar Grab Sampler from a boat, or manually obtain a grab sample with a trowel in near-shore areas. EPA will allow grab samples for initial sampling on rip-rap and concrete apron areas, however in order to collect samples more representative of the material deposited during the operational history of the facility, the other samples should be undisturbed core samples, using a 4" core, and collected at intervals down to consolidated old bay mud. If refusal is encountered before reaching the desired depth after 3 attempts, the deepest of the three attempted samples should be collected and analyzed.

2. Wedge-shaped sub-samples of the cores should be extracted for analysis and the rest of the core should be preserved and archived for future analysis, and/or split samples.

3. The samples should be taken at intervals of at least 3 homogenized samples per core: the top third of the core, the middle third, and bottom third. Before and after homogenizing, each core should be examined visually, described, and photographed. Where strata are visually distinguishable, additional samples should be collected from that strata and analyzed.

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Sample Locations

4. EPA agrees with Sims's plan to sample 29 locations shown in figure 3 of the March 1, 2015 SSAP. However, samples should also be collected from directly beneath Wharf 3, under the conveyor belt, which was likely contaminated by falling debris before the conveyor belt was encapsulated.

5. During at least a mean low tide (or lower), the near surface sediments in the shoreline sample area should be visually assessed, photographed and described, to identify visible signs and extent of contamination.

Lab Analyticial Methods

6. The analytical method for PCBs should be EPA Method 8082A with 3540C (soxhlet extraction) or 3541 (automated soxlet extraction). PCB concentrations should be reported as dry-weight concentrations to comply with the TSCA regulations; percent moisture should also be reported. Mercury should be analyzed using Method 7471B, or most recent version of that cold vapor method. Method 6010C ICPES method should be used for the other metals. These methods are occasionally revised and the current version of each should be used.

7. In addition to chemical analysis of samples, physical analysis of the samples should also be conducted, using a 1 mm sieve.

Data Analyses

8. Critical review of all sampling data by experienced site characterization professionals should be provided in writing along with the sampling data and analyses report described in section 1.5.1 of the draft SSAP.

9. Sims should compare and report results from the Sims sampling with the existing Port of Redwood City PCB data (collected by U.S. Army Corps of Engineers, and by Redwood Harbor). Sims should also compare and report PCB data from other similar areas of San Francisco Bay. San Francisco Estuary institute (SFEI) has reputable PCB databases available to the public.

Contingency Sampling

10. Sims should proceed with the Contingency sampling as described in Section 2.1.1; however, determination of whether or not to analyze contingency samples (and/or take additional contingency samples) should be decided not based solely on the draft SSAP "background" sample results, but rather through Sims and EPA reviewing and discussing the initial sampling results.

11. The draft SSAP section on Redwood Creek Background Concentrations (2.1.2) designates three sampling areas (by Wharfs 2, 4, and 5) to establish background concentrations of metals and PCBs. EPA agrees with these locations for "background" but is concerned the sample results will likely not be sufficient to establish a statistically reliable set of data for determining background concentrations given the long term historical industrial uses of the channel. Given this concern, EPA would like to review the results along with the adequacy of the number and locations of the samples collected and reassess with Sims the appropriate statistical and analytical methods. The statistical analysis methods may need revision at that time also.

Lastly, Sims should coordinate their sampling for observation and possible split sampling by qualified EPA sampling staff and EPA Region 9's point of contact in our Water Enforcement section, Juliet Hannafin. Revisions to the draft SSAP as described above are due to EPA within 45 days. Please send the revised draft SSAP to:

U.S. Environmental Protection Agency, Region 9
Water Enforcement Section II
75 Hawthorne Street (ENF 3-2)
San Francisco, CA 94105-3901
Attention: Juliet Hannafin

and

U.S. Environmental Protection Agency, Region 9
Office of Regional Counsel
75 Hawthorne Street (ORC-2)
San Francisco, CA 94104-3901
Attention: Rich Campbell

Thank you for your consideration of these initial comments. Should you wish to meet to discuss our comments, please contact Juliet Hannafin at 415-972-3094 or hannafin.juliet@epa.gov, or contact Rich Campbell regarding legal questions at 415-972-3870.

Sincerely,

for Claire Trombadore, Assistant Director
Water and Pesticides Branch
Enforcement Division