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**CC:** Joy Williams <Joy@environmentalhealth.org>, "Paul Manasjan(pmanasja@san....  
**Date:** 1/13/2011 2:59 PM  
**Subject:** EHC Comments on TDY Addendum #4

January 13, 2011

Mr. Tom Alo  
Regional Water Quality Control Board

BY EMAIL

RE: Environmental Health Coalition HC comments on the TDY CAO 2004-0258 Draft Amendment #4

Dear Mr. Alo:

Thank you for holding the workshop on the above noticed item. We really appreciated the opportunity to hear from all the stakeholders and staff about the progress on this issue.

We have not had time to fully review all the documentation but, based on the workshop, EHC has the following comments:

1. The Regional Board is well-advised to be better safe than sorry. EHC strongly supports the city of San Diego's position on lining the storm drain. TDY should be required to line 60-inch storm drain after it is cleaned. Then, we don't have to worry about it any more. TDY representatives stated that it was only \$1 million to do this which, in the world of PCB cleanup costs, is a small amount.
2. Waste in levels that exceed California hazardous waste standards should not be left on-site. We understand that there is an outstanding dry weight/wet weight controversy but it seems like this should be able to be objectively resolved. Perhaps an advice letter from DTSC should be requested to resolve the issue.
3. EHC has a 23-year history with the TDY contamination of San Diego Bay with PCBs. In the early 90's TDY, at that time called Teledyne Ryan, argued vociferously that they should not be made to pay for an extensive cleanup of the bay due to all the jobs they provided to the region. They were allowed to cap the PCB contaminants in the Bay saving millions and millions of dollars....and soon after they closed down and moved jobs away. In our view, TDY owes this region adequate funding to fully clean the site up. Since the Regional Board analysis that it will only cost \$1.2 million to remove all of the land site PCBs we believe that is an economically feasible action and should be required.
4. Cleanup levels for soil and groundwater should be the lowest levels that are technologically feasible and, in any case, not higher than the existing onsite maximum detected concentrations. First, the Alternative Cleanup levels themselves are ludicrous at face value. The alternative level for chloroethane in groundwater, for example, is 2,766,667 times the onsite maximum detected concentration. Finally, it may be premature to set any cleanup levels for these media, given the possibility (as stated on page 13 of Draft Addendum Number 4) that new areas of concern may be discovered; cleanup levels should not be set before full site assessment has been completed.
5. Any consultant used to conduct any verification should be selected and directed by the Regional Board and paid for by TDY.
6. Visual sampling of any of the cleanup is not adequate. All verification should be testing and sampling.
7. The Regional Board should require 2-5 years of monitoring of the discharges from the storm drains.
8. The closure documents issued by the Regional Board should include very specific and clear language that the closure can be revoked and the issue re-opened if the cleanup proves to be insufficient for any reason and/or if the land use plans change for the sites. It must also state that TDY is the responsible party in the event of a reopener.
9. The Addendum and closure documents should state that the risk-based cleanup levels are un-protective for fish and wildlife and sensitive receptors on site.

10. The CAO and closure documents should name TDY as responsible if PCBs are found in any future testing in water, groundwater, storm water, the Bay, on land or in site materials.  
Thank you for the opportunity to comment on this issue.

Sincerely,  
Laura Hunter  
Associate Director for Programs

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