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Captain John Jones
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Dear Captains Janov and Jones:

SUBJECT: SITE 6A AT THE NAVAL STATION LONG BEACH - REMOVAL SITE EVALUATION REPORT

The Port of Los Angeles (POLA) has reviewed of the Draft Remedial Site Evaluation (RSE) dated January 17, 1994, and the Final RSE dated March 7, 1994, for Site 6 A of the Long Beach Naval Station, Long Beach. Based upon our review of the Draft and Final RSE reports and subsequent meetings, we have the following comments:

- On page 2-6 of both the Draft and Final reports it is stated that "The RSE was initiated in order to provide support to the proposed POLA construction plan for a permanent railroad crossing and associated 5-foot deep excavations through a portion of Site 6A." The RSE does not adequately accomplish this objective. POLA was anticipating a document which defined what requirements there would be for the construction of a temporary roadway and permanent improvements, including utility relocations.

- What assumptions were made in the RSE of the POLA construction activities that will occur on Site 6A?

- It appears that an assumption was made that excavation would be to 7 feet below ground surface (bgs) or to the groundwater, based on the fact that the risk assessment was performed by integrating all sampling depths. This assumption is not consistent with the proposed railroad construction design which will excavate to a maximum depth of 3 feet bgs.

- There is no direct correlation between the risk assessment and data collected, and the Evaluation of Remedial Alternatives, and Conclusions and Recommendations Sections. The report never summarizes the need for any remediation. There needs to be a discussion of what specifically needs to be remediated in what locations and why it is being remediated. There needs to be a justification for discussing remedial alternatives.

- There were no remedial alternatives discussed in the Draft RSE, and yet there is a new section in the Final RSE which evaluates remedial alternatives.

- Isolation/capping was listed on page 8-3 as Alternative 2, to No Construction Activities at Site 6A. It is unclear why this is not a viable alternative for POLA construction activities.

Why is Isolation/containment (capping) proposed for the No Construction Activities on Site 6A? The surface soil was not identified as posing any risk. Is the cap proposed to prevent the leaching of any potential contaminants in the subsurface soil into the groundwater? This is not addressed, though it may be an assumption that is made. It is understood that the groundwater investigation will occur under a different CTO at a later date, but some determination of the subsurface soil conditions could have been made with the existing data to determine a likelihood of the potential of contaminants to migrate to the groundwater.

If the isolation/capping has been proposed to prevent the migration of potential subsurface contaminants to the groundwater, then this should also be a viable alternative to the POLA railroad construction project.

- Chemical Fixation/Stabilization is listed on page 8-1 as a remedial technology to be evaluated. This alternative was not addressed in the remainder of the evaluation. Chemical Fixation/Stabilization may be an effective, more cost effective alternative for the POLA railroad construction project then the proposed excavation, segregation and treating or land filling the material. This alternative may also be preferable for the protection of the construction worker and to the environment if there is any risk.

- Alternative 1, proposed as a remedial action for the railroad construction area on page 9-3 states "It is recommended that the excavation of the area of concern at this location should proceed by excavating segregating and stockpiling down to approximately 7 feet bgs." It is not clear from this statement what the area of concern at this location means. This could be inferred that it is the entire excavation area for the railroad construction. What exactly does this alternative recommend? Why is it recommended to excavate down to 7 feet bgs? What assumptions have been made in deriving this alternative? However this alternative is deciphered, POLA feels that there may be more appropriate remedial alternatives, if it is determined that remedial action is required.

- Alternative 2, on page 9-3 states that "Soil containing metals and SVOC that are determined to be hazardous will be transported to a Class I landfill." POLA feels that there may be more appropriate remedial alternatives for these constituents, if it is determined that remedial action is required.

- The multiple exposure pathway in the risk assessment is the sum of the inhalation, dermal, and ingestion risk values. There was a risk of 1.1x 10-5 identified for the construction worker scenario which is based upon the multiple exposure pathway. Inhalation is the greatest value of the multiple exposure pathway which is equal to 1.1x 10-5. (See Table 7-5 and page 9-2). Hexavalent chromium was the chemical that drove the inhalation risk factor which was 9.5x 10-6 which also drives the multiple exposure pathway risk factor. The hexavalent chromium was determined by reanalysis of three sampling points where high levels of chromium was found in the primary sampling effort. The test results show that only one sample contained hexavalent chromium which was two percent of the total chromium of that sample. It appears that it was assumed then that all of the sites samples taken contained two percent hexavalent chromium, see page 7-9. We feel this is too conservative an assumption to make due to its affect on the interpretation of the entire cancer risk value.

- The higher risk locations were identified on page 7-21 as SB-8 and SB-17. Shouldn't this be SB-19 not SB-17?

- There is no evidence showing the subsurface soil has an incremental cancer risk of slightly higher than 10-5 (See page 9-2). Is this statement based on the cancer risk probability for multiple exposure pathway on Table 7-5 which has a value of 1.1x10-5?

It is crucial to the schedule for the Pier 300 project to determine what is required by the Port of Los Angeles to expedite a decision on what requirements there will be upon excavation of material for utility relocations and the construction of rail tracks across a portion of the site.

If you have any questions or comments, please contact Betsy Foley at (310) 732-3975.

Sincerely,

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