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 NAVSTA LONG BEACH
 SSIC #5090.3

22 March 1993

MEMORANDUM

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Subj: LONG BEACH NAVAL COMPLEX (LBNC) RCRA ENFORCEMENT

1. Enclosure (1) was handed to me by Mr. Craig O'Rourke of DTSC on Friday. This is an internal DTSC memo which details the Region 4 rationale for keeping the clean-up oversight of LBNC within the RCRA Permitting Branch.
2. Since there has been a new unit formed within DTSC to handle base closures, the new unit head from Sacramento, David Wang, was at Region 4 on March 18th to discuss DTSC's plans for LBNC. The Region 4 RCRA Permitting Branch would very much like to keep LBNC in permitting. As the letter points out, they feel there will be an on-going increase in the number of SWMU's from a "comprehensive base-wide UST investigation".
3. DTSC also stresses that the "current project team is working extremely efficiently" and that a "significant amount trust and camaraderie has been built up". This is an indication that the teambuilding efforts put forth to date have been successful. This is a positive reflection on all of our parts.
4. According to Craig O'Rourke, David Wang agreed with the conclusions of the permitting branch and the current plan is to have permitting be the lead within DTSC with interface with Site Mitigation only as required.
5. This is for your information only. No action required.

ANDREA MUCKERMAN

Enclosure:
 (1) DTSC Memorandum dtd February 22, 1993

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ENCLOSURE (1)
DTSC MEMORANDUM

RCRA ENFORCEMENT

DATED 22 MARCH 1993

California

Department of Toxic Substances Control

m o r a n d u m

To: Mohinder S. Sandhu, P.E., Chief
Facility Permitting Branch

Date: February 22, 1993

From: Anand Rege
Unit Chief

Subject: Craig O'Rourke

Subject: Long Beach Naval Station/Shipyard (LBNC): Proposal for keeping the RCRA Corrective Action activities within FPB.

Before a final determination is made to reassign LBNC to the Base Closures Branch, many factors should be considered. There are a number of unique issues related to LBNC that differentiate it from the other federal facilities. As a result, the closure of LB Naval Station may be best facilitated through FPB in conjunction with the on-going corrective action for LBNSY with occasional limited guidance from the Base Closures Branch.

The most obvious difference between LBNC and most of the other federal facilities is that the order to clean-up was administered through the corrective action portion of the facility's RCRA hazardous waste facility permit (Permit). This order was initiated following the RFA and the identification of 13 SWMUs requiring further study. Although the methodology used to effectuate clean-up may follow the NCP - CERCLA process, it will be important to maintain consistency with all aspects of the facility's Permit. Current activities that are being implemented through Permit maintenance involve the possible identification of additional SWMUs through an ongoing comprehensive base-wide UST investigation. This involves the review of Closure Plans and/or Phase I RFIs for all USTs. Depending on the location of the tank and the extent of any release, a determination will be made as to whether or not the releases qualify as new SWMUs or can be added to existing SWMUs.

Furthermore, it does not make sense to separate LBNSY from LB Naval Station for clean-up. For besides the facilities sharing a common SWMU (bay sediments) which should be addressed simultaneously, having two different branches working on the clean-up would entail a major duplication of effort by two DTSC RPMs and henceforth would not be an efficient use of resources,

The LBNC also contains some unique contaminant features that are not found at any of the other Region 4 base closures. First, the LBNC has a bay sediment SWMU that requires special attention by a number of specialists (oceanographers and marine biologists); agencies (NOAA, Army Corp. of Engineers, Port Authorities, etc.); and toxicologists (risk assessors). FPB staff has experience with this type of contamination, for NASNI, another FPB corrective action site, also has a bay sediment contamination problem. Secondly, since LBNC is a marine location FPB staff have become familiar with the SWRQCB's Bay and Estuaries Plan and Ocean Plan addressing marine requirements. Finally, LBNC is also unique in that it does not overlie any beneficial use aquifers and therefore clean-up standards may be somewhat higher than at the other federal facilities. NASNI also does not overlie a beneficial use aquifer. Consistency between LBNC and NASNI should be maintained due to their similarities.

The most important reason why LBNC should remain in FPB is that the current project team is working extremely efficiently. All members of the team are intimately involved and familiar with all aspects and intricacies of LBNC. All members are aware of where the project has been and where it's going. A significant amount of trust and camaraderie has been built up over the life of the project and a disruption in the cohesiveness of the team may set the project back considerably.

In addition, the complexities of the project may be overwhelming for a new staff person. Certainly, it would not be appropriate to transfer the project at this time. The project is currently approaching the completion of the Draft RI/FS Workplan (Phase II RFI). FPB has been involved in the technical and administrative aspects leading up to the workplan's completion and, therefore, FPB would be best prepared to offer the most efficient and timely review. The workplan is due April 30, 1993 and DTSC has promised collective agency comments by June 30, 1993.

Following the incorporation of the DTSC comments, the workplan will be ready for implementation. Preliminary schedules indicate the field work could begin as early as October and subsequently carry on for roughly a year. During this time, DTSC involvement would only entail field work oversight and trouble shooting (not a significant draw of resources). Dependent on base closure priority and timing, a point of departure could be made to accelerate the work at LB Naval Station and move more quickly toward final remediation, however, this is still two years away.

FPB staff has and will continue to make the remediation of LBNC (specifically closure of LB Naval Station) a priority. Although it is a priority, the FPB staff will not lose sight of his/her other projects and responsibilities. On the contrary, the knowledge and experience FPB staff will gain by following this project to fruition will ultimately save countless hours of research and training on other projects down the road. Proceeding with this project will give a significant boost to the FPB morale, technical expertise and diversity. The project will go along way toward developing and assuring a successful corrective action team in FPB.



Craig A. O'Rourke
Hazardous Materials Specialist