



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

N68311.000445
NAVSTA LONG BEACH
SSIC #5090.3

August 4, 1994

Naval Station Long Beach
Bldg 1, Code N46.2
Long Beach CA 90822-5000
Attn. David Pease

Subject: Draft Final RI/FS Risk Assessment Work Plan CTO-015/016
for Naval Station Long Beach

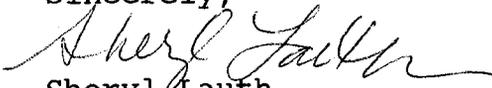
Dear Mr. Pease:

The Environmental Protection Agency (EPA) has received the Draft Final RI/FS Risk Assessment Work Plan CTO-015/016. EPA had very minor comments on the human health portion of the final Risk Assessment Work Plan dated January 30, 1994 and did not request the NAVY revise the final Work Plan. It was our understanding that the subject document was to incorporate minor changes to exposure pathways, as agreed to in the June 16, 1994 meeting, and would require limited review by the agency. However, the subject document has been completely rewritten with no discussion of the rationale for revising the June 30, 1994 document or the relationship between the January 30, 1994 and June 30, 1994 documents. We would suggest incorporating some discussion regarding the two documents into the introduction section of the June 30, 1994 document for clarification.

Attached is a copy of the Memorandum from Dr. Sophia Serda regarding comments on the draft final document. As outlined in the Memo, Dr. Serda reviewed the subject document as a supplement to the January 30, 1994 document with the assumption that the site specific information provided in the original January 30, 1994 Work Plan would be carried through to the final risk assessment.

If you have any questions or comments regarding this letter, please contact me at (415) 744-2410.

Sincerely,


Sheryl Lauth
Remedial Project Manager

cc: Alan Lee, Southwest Division
Alvaro Gutierrez, DTSC

MEMORANDUM

To: Sheryl Lauth (H-9-1)
Remedial Project Manager

From: Sophia Serda, Ph.D. (H-9-3) *SSMS*
Regional Toxicologist

Subject: Review of the Draft Final RI/FS Risk Assessment Work Plan for Long Beach Naval Shipyard , Long Beach, Dated June 30, 1994.

Date: August 4, 1994

GENERAL COMMENTS

1. The title/signature page of the document states that this document is the work plan for the Long Beach Naval Shipyard yet the texts states that this is the work plan for the Long Beach Naval Station. Correct this discrepancy.
2. The *Final Risk Assessment Work Plan Remedial Investigation/Feasibility Study Sites 1,2,3,4,5,6a and 7, Naval Station Long Beach, dated January 30, 1994* was approved by the Agency. **It was the Navy's contractor that wanted to change a few exposure pathways and delete the air modelling effort (NOTE: changes were not initiated by EPA).** These minor changes to the Risk Assessment Work Plan were verbally agreed to at a lunch time working meeting on 6/16/94. I anticipated very few changes would be made to the Risk Assessment Work Plan. However, the document I received for review as the Risk Assessment Work Plan for the Naval Station Long Beach has undergone extensive revisions. In fact it appears to be entirely rewritten when an entirely new document was not warranted.

I have not done a intensive line by line comparison of the approved *Final Risk Assessment Work Plan Remedial Investigation/Feasibility Study Sites 1,2,3,4,5,6a and 7, Naval Station Long Beach, dated January 30, 1994* and this current Risk Assessment Work Plan. I view the current Risk Assessment Work Plan as a supplement to the original Work Plan that was approved by the agency.

If you have any questions regarding my comments, I can be reached at (415) 744-2307.