

1823 File : Base Closure



DEPARTMENT OF THE NAVY
OFFICER IN CHARGE
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND DETACHMENT
BROADWAY COMPLEX
555 W. BEECH STREET, SUITE 101
SAN DIEGO, CALIFORNIA 92101-2937

1823 AM _____

1823 FA _____

1823 LAST

N68311.000557

NAVSTA LONG BEACH
SSIC #5090.3

09C:Ser 1070

5 NOV 1992

Via Facsimile

Arthur B. Goodwin, P.E.
Port of Los Angeles
P. O. Box 151
San Pedro CA 90733-0151

Dear Mr. Goodwin:

As you requested in a telephone conversation earlier this week with Mr. Jack L. Wells of this office, the following is a summary description of the information that we require to evaluate the request of the Port of Los Angeles for the use of Navy land adjacent to Seaside Avenue in connection with the port's proposed projects on Pier 300. I'm sorry that you were unable to decipher the message covering these points left on your voice mail on October 30.

The Navy has a Hazardous Waste Facility Permit from the California Department of Toxic Substances Control covering the operation of Naval Station Long Beach. The property that you seek to use is a part of the Naval Station and has been designated as a solid waste management unit (Site 6A). Navy records, sampling and analytical results indicate that Site 6A was operated as an industrial waste landfill and that it contains hazardous constituents. The DTSC permit contains a number of corrective action requirements, including requirements for the investigation of several solid waste management units and implementation of any necessary corrective measures. The Navy must complete its investigation workplan no later than April 30, 1993. Thereafter, the workplan must be approved by DTSC and implementation is required to begin shortly after approval.

While there may be a number of things that the Port of Los Angeles could do to assist us in the process of characterizing and remediating all or a portion of Site 6A, and making it ready for temporary or permanent transfer, it needs to be clearly understood that the Navy's priority is to comply with its obligations under the Hazardous Waste Facility Permit. You should also be aware of the fact that Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) imposes conditions which must be met before a federal agency transfers property on which any hazardous substance was stored, released or disposed of. This section was amended only this month to impose additional requirements which may impact on the process of transferring the property in question.

To explore the options which may be available and to develop a plan which could be presented by the Navy to DTSC, we would like to have the following additional information concerning the port's projects, as it relates to Site 6A:

- We have excerpts of right of way maps which were attached to Dr. Appy's letter to Jack Wells dated October 26. We would like to have a map or maps containing greater detail, if such a map presently exists.
- We believe that the site contains volatile organic compounds (VOC's) and we are concerned about the potential effects of road or railbed construction on the movement or release of the VOC's. Therefore, we need details regarding anticipated excavation, boring and compaction related to the projects.
- We need to have the port's schedule for construction, including access to the site for geotechnical or other investigations, to assist in determining whether there may be any conflict between the Navy's schedule for facility investigations and possible remediation activities.
- We understand that the port may have performed soil and/or ground water investigations on property adjacent to Site 6A. We would like to have information regarding those investigations as it may aid the Navy in developing its investigation plan.
- It appears that the Navy may have to incur additional expenses in connection with possibly having to expedite its efforts to remediate, and that the nature of remediation may be more extensive, given the port's proposed use. Therefore, we would like to have your thoughts on how the port might propose to bear its fair share of the financial burden.

The Navy will informally advise the staff of DTSC of the port's proposed use of Site 6A. After we receive the information described above, we would like to have another meeting with port staff sometime after November 23 to discuss how we might be able to meet the port's needs in a manner consistent with the constraints of our Hazardous Waste Facility Permit. Should you require any further information, please do not hesitate to contact me.

Sincerely,



W. M. Robinson, Jr.
Executive Director

Blind copy to:
NAVSTA Long Beach (Code N4)
LCDR Power - 09RN
Rex Callaway - 09C6
Linda Geldner - 1823
Code 24
Code 232
BC09C