

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4

5 West Broadway, Suite 425
Long Beach, CA 90802-4444
(310) 590-4868



CODE 10
OCT 17 1995
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NAVSTA LONG BEACH
SSIC #5090.3

Mr. Kurt Baer
Remedial Project Manager
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway, Room 18
San Diego, California 92132-5181

Dear Mr. Baer:

Removal Action at Installation Restoration Program Site 3, Area of Potential Concern (AOPC) 4, Naval Station Long Beach, California

The California Department of Toxic Substances Control (DTSC) has received your letter indicating that the *Draft Remedial Investigation (RI) Report for Site 1-6A* at Naval Station, Long Beach dated May 17, 1995, will serve as a Removal Site Evaluation (RSE) at Site 3, AOPC 4. As stated in your letter, DTSC will recommend the Navy to follow the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Non-Time Critical Removal process.

DTSC feels that the RI report data has not fully characterized the lateral extent of contamination at Site 3, AOPC 4. Even though the lateral extent has not been fully characterized, DTSC still concurs with the removal action because the risk at Site 3, AOPC 4 exceeds the National Contingency Plan's generally acceptable risk range. Furthermore, DTSC will recommend that after the removal has been conducted, confirmatory sampling is collected to determine whether the lateral and vertical extent of the contamination has been removed. Based on the results of the confirmatory sampling, DTSC will determine if any further mitigation is necessary or if no further action is appropriate. If excavation is part of the removal, DTSC recommends that a Health and Safety Plan be developed with precautionary measures for the safety of the worker. In addition, DTSC would like the Navy to provide information on waste disposal methods and that the ninety day accumulation time of hazardous waste at the site not to be exceeded.

Finally, DTSC recommends that the Navy submit a Draft Action Memorandum before starting work at the site and a schedule of planned activities to take place during the removal. DTSC would like to discuss this schedule with the Navy because time has to be allocated for the California Environmental Quality Act (CEQA) process. Furthermore, DTSC recommends that all community relations requirements for a non-time critical removal are adequately addressed.



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DTSC appreciates the effort the Navy has done to take actions to protect human health and the environment. If you have any questions regarding this letter, please contact me at (310) 590-5565.

Sincerely,



Alvaro Gutierrez
Base Closure Team Member
Region 4 Base Closure Unit
Office of Military Facilities

cc: Mr. Albert Arellano Jr., P.E. (R4-4)
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