N64 N68311.000815
NAVSTA LONG BEACH
SSIC #5090.3

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27 March 1996

Mr. Martin Hausladen, H-9-4
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

W.O. 04900-006-008
DCN: 4900-06-08-AAAM

Subject: **Comments on Draft EE/CA Non-Time Critical Removal Action for IRP Site 3, AOC4 Naval Station Long Beach**

Dear Martin:

Attached please find our comments on the Draft EE/CA Non-Time Critical Removal Action for IRP Site 3, AOC 4 Naval Station Long Beach. The file has been sent to your Internet address.

The first comment is actually a minor point, given that the estimated volume of arsenic contaminated soil is 15 cubic yards. The comment was included because an EE/CA should address applicable and reasonable alternatives for the site. The Navy's limited action is not really a separate alternative and should be wrapped into a No Action/Institutional Controls alternative.

Also please note that this review did not consider whether the actual volume of soil requiring remediation is 15 cubic yards, whether the only contaminant of concern is arsenic or whether the state has accepted the Bays and Estuaries Plan/AWQC for screening groundwater.

The total effort associated with this review was 25.5 hours (technical LOE).

If you have questions, please contact me at (510) 603-7917.

Very truly yours,

ROY F. WESTON, INC.

Karla Brasaemle

Karla Brasaemle
Site Manager

KB/ed
Enclosure

REVIEW COMMENTS
DRAFT EE/CA
NON-TIME CRITICAL REMOVAL ACTION FOR INSTALLATION RESTORATION PROGRAM
SITE 3, AREA OF CONCERN 4
NAVAL STATION LONG BEACH – LONG BEACH, CALIFORNIA

General Comments

The scope of the alternatives reviewed does not represent a comprehensive examination of alternatives potentially applicable to this site. The "Limited Action" alternative is no more than the institutional controls in the form of a deed restriction. Further, other technologies and process options, such as stabilization, are suitable for the treating arsenic-contaminated soil. EPA recommends the following alternatives be evaluated for remediation of the site:

- No Action/Institutional Controls
- Capping/Horizontal Barriers
- Stabilization
- Off-Site Disposal

Specific Comments

1. **Executive Summary, p. i, third paragraph.** Please complete the last sentence of this paragraph.

2. **Section 2.1.6, p. 2-5.** The basis for the identification of environmental receptors appears to be previous reports, of which the most recent was prepared in 1990. Have results been confirmed with the Dept. of Fish and Wildlife? Please discuss whether DON has conducted a more recent identification of potential ecological receptors.

3. **Section 2.3, p. 2-8.** Although the previous section includes a discussion of petroleum contamination to a depth of 8 feet, it is not clear why this discussion of nature and extent only includes surface soils. If the shallow water-bearing unit is hydraulically connected to the harbor (as stated in Section 2.1.3), then the subsurface contamination could be a potential source of surface water contamination. Even if the RAOs discussed later in the document only focus on human health, this section should describe the full extent of soil contamination.

4. **Section 2.5.1, p. 2-11.** To put the values for AOC4 in perspective, it should be noted that they are outside the acceptable ranges stipulated in the NCP (as stated much later in Section 4.3.2.1).

5. **Table 3-2, p. 3-9.** Describe (in the text) how the 12 mg/kg arsenic threshold was derived.

6. **Section 3-10, p. 3-10.** See specific comment No. 3 on Section 2.5.1.

7. **P. 4-1, First Paragraph.** Additional technologies should be screened for applicability, and considered and evaluated as potential remedial alternatives. In particular, the document should address horizontal containment (i.e., capping), as well as stabilization of the waste.

7. **Section 4.3.1, p. 4-8, Section 4.3.1, third paragraph.** It would be helpful to discuss the CERCLA Off-site Rule in this section; although, like DOT regulations, this is not an ARAR.

   Given the total arsenic concentrations, the need to stabilize the soil prior to disposal is likely. This document should address the stabilization/fixation process. Stabilization may be performed at the disposal facility prior to entombment of the soil

9. **Section 4.3.3, p. 4-11.** See Comment 7 on CERCLA Off-site Rule.

APPENDIX A

<u>Specific Comments</u>

1. **Section 1.3.2.2, p. A-5.** Outline the responsibilities of the state and the DON with respect to the solicitation and identification of state ARARs, as set forth in the NCP. A discussion of when local laws would be considered ARARs (for example, they generally are not unless the requirements are adopted and legally enforceable by the state) would also be helpful.

   First paragraph, last sentence. Clarify whether this decision was documented and conveyed to the state. The statement only references the solicitation letter sent to the state.

   Fourth paragraph, last sentence. Documentation of the state decision should be referenced.

2. **Section 1.3.2.3, p. A-6.** Explain that the criteria used to screen the state's list of potential ARARs were obtained from the NCP. Also, explain the meaning of "not properly promulgated."

3. **Section 2.1.3, p. A-12.** See Comment 7 for CERCLA Off-site Rule.

4. **Section 3.1, p. A-15.** Please check the citations as some appear to be incorrect and also list the implementing regulations.