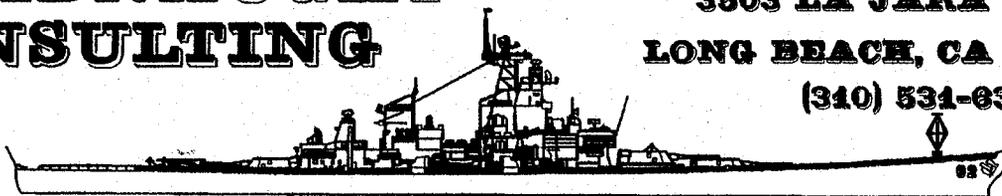


DREADNAUGHT CONSULTING

R. A. LANDGRAFF
3503 LA JARA STREET
LONG BEACH, CA 90805-3955
(310) 531-6317



Dreadnught@aol.com

22 August 1996

RECEIVED
CODE 18
15 40
Alan K. Lee
Base Environmental Coordinator
Southwest Division Code 1832.AL
NAVFAC Engineering Command
220 Pacific Hwy.
San Diego, CA 92132-5181

Subject: Point/Counterpoint; Agencies' Comments on RI for Site 7.

References:

- (a) Joint Agencies' Comments on Draft RI Report for Site 7 LBNC.
- (b) Additional Comments by R. A. Landgraff dated 20 May 1996 and submitted 21 May 1996.
- (c) Figure 3-2 of CTO-0026; West Basin Sampling Locations.
- (d) Figure E-1 of Environmental Baseline Study for LBNS.

Mr. Lee:

I have reviewed reference (a) that was handed out at the RAB meeting on 20 August 1996. Overall it appears to reflect most of the concerns of the RAB. However, there are a few points regarding it that I would like to have on record.

The second paragraph, second sentence of the Introduction of reference (a) states an intent to offer recommendations that would not require "--- return to the field for new sampling ---".

Perhaps re-doing the entire field work of the entire West Basin is not required. However, I must call attention to the vicinity of the former pier 4 that has been ignored.

I questioned the validity and accuracy of randomly selected sampling stations and the almost total disregarding of the pier 4 area in reference (b). At the time I submitted reference (b) on 21 May 1996, I believe I was tactful in referring to the pier 4 area as being apparently ignored. However, I have not received any response to reference (b) in either the July or August meetings and must assume that it is being actually ignored.

Though I am pleased that Section 3 of reference (a) rejects reference station 40010 as a comparison base, I am displeased that the agencies did not also take into account the selection of sampling station locations with the exception in Section 4 of station 24 as being superfluous. A glance at any historical map, such as reference (d), would also recommend station 14 as being superfluous.

Section 5 of reference (a) has an emphasizing ending to its first paragraph; "Compare apples to apples." This is the point I have tried to make in reference (b) and the only way to do it would be to lay out a scientifically plotted geometric grid to get a true cross section of the harbor sediments. At least, that is what should have been done in the first place to prevent the controversy we have now. However, it is late in the game and it is time for all to make some concessions.

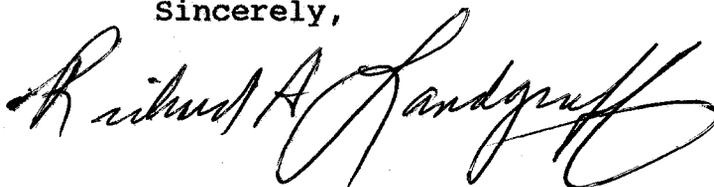
I recommend, as one of the remedial actions to be considered by the agencies and the Navy's contract laboratory, that reference (c) be reviewed for adding two sampling stations in the area of the former pier 4 for full and complete analysis.

The sampling stations, including sub-surface corings at both, should be located at Latitude 33 deg-45.17 min North by Longitude 118 deg-13.93 min West (near the end of the former pier 4) and at Latitude 33 deg-45.22 min North by Longitude 118 deg-13.96 min West (near the center of the former pier 4).

Note that the ridge of harbor bottom topography, shown in reference (c), near station 14 is not where pier 4 used to be. Pier 4 was about half way in between stations 50 and 13 and only extended out into the harbor about two thirds the length of pier 3. The ridge is probably a berm from dredging of the east side of pier 6.

Additional subsurface cores at the ends of piers 1 and 3, similar to pier 2, would give the most accurate analytical cross section of the harbor. However, in the interest of expediting remedial actions and preventing further delay in turning over the property for re-use, I believe that the subsurface cores at pier 4 will give sufficient data for the revision of Section 7 of CTO-0026.

Sincerely,



P.S.

I trust that you will provide sufficient copies of this letter to the appropriate offices and agencies so their responses will be available by the September RAB meeting.