



Department of Toxic Substances Control

Jesse R. Huff, Director
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Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

July 7, 1998

Mr. Thomas Macchiarella
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway, Room 18
San Diego, California 92132-5181

Dear Mr. Macchiarella:

DRAFT FEASIBILITY STUDY FOR INSTALLATION RESTORATION SITES 7, NAVAL STATION LONG BEACH, LONG BEACH, CALIFORNIA

The Department of Toxic Substances Control (DTSC) has completed its review of the *Draft Feasibility Study (FS) for Installation Restoration Sites 7, Naval Station Long Beach, Long Beach, California*, dated April 1998. The *Draft FS* was prepared by Bechtel National, Inc.

The *Draft FS* addresses the Installation Restoration (IR) Site 7 at Long Beach Naval Station. DTSC concurs with the additional sampling that is being proposed to provide additional information regarding the horizontal and vertical extents of the Areas of Ecological Concern at IR Site 7. However, due to expanded dredging plans which were presented by the Port of Long Beach (POLB) during the BCT meeting on June 30, 1998, DTSC suggests that it may not be necessary to conduct additional sampling in Site 7 areas to be dredged.

In addition, DTSC requests that the Navy obtain a formal letter from the POLB to specify their revised and expanded dredging plans. DTSC further requests that this letter be submitted to all Federal and State agencies participating in this project, so as to provide the agencies with information and understanding of the POLB proposal. This will enable the agencies to better evaluate the need for continuing CERCLA cleanup at specific locations, thereby facilitating correlation of cleanup and reuse.

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DTSC comments are as follows:

1. DTSC recommends that the Navy add clarifying language in the FS to indicate the proposed reuse of the property, and to note the possibility that the reversionary clause may be invoked in the near future. Also, the Navy should note that this property will be under Lease in Furtherance of Conveyance to the City of Long Beach, and subleased to the POLB. The Navy may also wish to reference Department of Defense policy regarding CERCLA liability while under lease and at time of future transfer.
2. Page ES-1, Natural Attenuation, Executive Summary: One of the principal purposes of the sampling in the FS Workplan is to show that some natural attenuation has occurred. This will be done in part by comparing 1994 data, collected for the remedial investigation to determine horizontal extent of contamination, with data to be collected in the FS Workplan. This express purpose should be stated explicitly in three places, i.e., the Executive Summary; in Section 3 Data Quality Objectives; and in Section 6 Data Evaluation Methods.
3. Risk Reduction: DTSC requires that all FS Reports clearly state the amount of risk reduction for all alternatives considered, compared with baseline conditions. At Site 7, where some of the risk will be estimated by way of benthic community analysis, DTSC requests that the Navy use some method of estimating risk reduction by semi-quantitative or qualitative means.

DTSC has reviewed the Environmental Protection Agency comments on the *Draft FS*, and agrees with their comments and recommendations. If you have any questions, please contact me at (714) 484-5417.

Sincerely,



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

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