



Department of Toxic Substances Control

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NSY LONG BEACH
SSIC NO. 5090.3



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California Environmental
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November 15, 1999

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DRAFT PRELIMINARY ASSESSMENT - SAMPLING REPORT FOR 171 AREAS OF CONCERN FOR THE FORMER LONG BEACH NAVAL SHIPYARD

Dear Mr. Rollefson:

The Department of Toxic Substances Control (DTSC) has completed the review of the July 27, 1999 draft Preliminary Assessment - Sampling Report for the 171 Group B Areas of Concern (AOCs) for the Long Beach Naval Shipyard. In general, DTSC agrees with the findings and conclusions of the sampling report; however, we have several comments related to the conclusions of the report. These comments are provided below.

1. Section 4.40.2, Page 4.40-2:

Typographical error. The last sentence of this page is repeated on the next page.

2. Section 4.53.9, Recommendations:

Although there is no current risk to human health and the environment from the wood block floors due to ceased operation at this facility, the Navy does acknowledge that the floor could be considered a hazardous waste when disposed of. DTSC is concerned that proper notification must be provided to the future land owner (Port of Long Beach) and its contractors before the facility is razed or deconstructed. As a generator of potential hazardous waste, the Navy has the responsibility to ensure that it is ultimately properly handled. Although the Navy has concluded that no further investigation is needed at this facility, the Navy should not automatically conclude that it is "No Further Action." DTSC

requests that the Navy provide, in this report, a reporting mechanism that the Port of Long Beach would have to follow to assure DTSC and the Navy that the potentially hazardous wastes will be handled in appropriate manner and in accordance with applicable state and federal regulations.

DTSC notes that there are numerous AOCs with situations that are similar to the wood block floors at Building 128. DTSC requests that the Navy append the report as recommended above for all the applicable AOCs.

3. Table 4.54-6, Page 4.54-6:

Please explain why the regulatory threshold levels have been changed from those cited in Table 4.53-10 (e.g. Beryllium, Selenium, and Thallium)?

4. Section 4.194.9, Page 4.194-3:

The recommendation for this section is "No Further Action." However, the dissolved concentration of Mercury for all three samples exceeded the screening criteria for water, although not the background level. DTSC will defer the decision on the necessity for additional action to the Regional Water Quality Control Board. The Navy should confer with the Water Board for a resolution on this AOC.

5. Table 5-1, Conclusions and Recommendations:

For AOCs that have been proposed for "No Further Action" under the CERCLA process, but will be managed or studied under a separate program of the Navy - e.g., compliance program for gas station and underground storage tank removals, DTSC requests that the Navy specifically include this information in the recommendations column of Table 5-1. This will provide a concise summary of all the future work needed for the AOCs. This recommendation also applies to closures under RCRA, the California Tiered Permitting program, and Certified Unified Program Agencies (CUPAs).

6. General:

DTSC notes that the conclusions and recommendations of the draft Preliminary Assessment - Sampling Report are based, in great extent, on the U.S. EPA Region 9 - Industrial Preliminary Remediation Goals. Despite the Navy's arguments used in Section 2.4 of the report for the assessment of potential contaminant pathways, DTSC believes that the Navy should evaluate the AOCs against both residential and industrial PRGs, as advised under Section 1.0,

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Introduction, of the *EPA Region 9: Preliminary Remediation Goals Guidance*. Unless a non-restricted future land use scenario has been evaluated, the Navy cannot determine that the risks associated with an improbable change in land use are acceptable. Therefore, the Navy may need to deed restrict all the AOCs for industrial use only. This could be problematic in procedure since Institutional Controls are considered a remedy. The Navy may, therefore, need to complete a No Further Action ROD with Institutional Controls and enter into a Land Use Covenant with DTSC prior to disposal of the Long Beach Naval Shipyard.

DTSC requests that the Navy evaluate the above comments and provide a written response to us for evaluation. If you have any questions regarding this letter, please contact Ms. Sue Hakim at (714) 484-5381.

Sincerely,



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