



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

5090.4
Ser 06CM.DR/
January 12, 2000

Ms. Sue Hakim
California Environmental Protection Agency
Department of Toxic Substances Control
5796 Corporate Way
Cypress, CA 90630

Dear Ms. Hakim:

Enclosure (1) is the Navy's Response to Comments for the Agencies review of the Draft Preliminary Assessment/Sampling Report for 171 Group B Areas of Concern, Long Beach Naval Shipyard, Long Beach, California. Request your review and concurrence be provided by January 31, 2000 to:

Commander
Attn: Duane Rollefson (Code 06CM.DR)
Southwest Division, Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

For questions or concerns regarding this matter, please contact Mr. Duane Rollefson at (619) 532-0974.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Macchiarella".

Thomas Macchiarella
Acting BRAC Environmental Coordinator
By direction of the Commander

Enclosure: (1) Navy Response to Comments for the Agencies review of the Draft Preliminary Assessment/Sampling Report for 171 Group B Areas of Concern, Long Beach Naval Shipyard, Long Beach, California

5090.4
Ser 06CM.DR/021
January 12, 2000

Copy to:
Ms. Ana Veloz-Townsend
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Mr. Martin Hausladen
U. S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

Ms. Christine Houston
Environmental Planner
Port of Long Beach
925 Harbor Plaza
Long Beach, CA 90801-0570

5090.4
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January 12, 2000

Blind copy to:

04EN.DS (Admin Record- Compliance, NAVSTA Long Beach)

06CT. ED? (Ed Dias)

06CL .TM Thomas Macchiarella

06CL.MO (Melita Orpilla, ref. CDM DO-011)

Serial file

Writer: D. Rollefson, Code 06CM.DR, X2-0974

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**RESPONSE TO AGENCY COMMENTS
ON THE DRAFT PRELIMINARY ASSESSMENT/SAMPLING REPORT FOR 171 GROUP B AREAS OF CONCERN
LONG BEACH NAVAL SHIPYARD, LONG BEACH, CA**

Comments from Department of Toxic Substances Control (DTSC) - dated 15 November 1999

		DTSC COMMENTS	NAVY/CDM FEDERAL RESPONSE
Specific	1.	Section 4.40.2, Page 4.40-2. Typographical error. The last sentence of this page is repeated on the next page.	Concur. The repeated sentence has been removed.
Specific	2.	<p>Section 4.53.9, Recommendations. Although there is no current risk to human health and the environment from the wood block floors due to the 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 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 the facility, the Navy should not automatically conclude that it is "No Further Action." DTSC requests 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 the applicable state and federal regulations.</p> <p>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 applicable AOCs.</p>	<p>The Lease in Furtherance of Conveyance (LIFOC) signed by the City of Long Beach Harbor Department requires the lessee to comply with all applicable environmental laws and regulations that are or may become applicable to the lessee's activities. The lessee is responsible for obtaining any environmental permits for construction and operation. The lessee is also responsible for obtaining its own U.S. EPA identification number which shall identify them as the generator and be used in preparation of hazardous waste manifests for the removal and transportation of wastes generated by the lessee. Upon lifting the access and use restrictions on the No Further Action AOCs under the terms of the LIFOC, the Navy will notify the lessee that the wood block floors may potentially be a hazardous waste when disposed. The lessee shall comply with the terms of the LIFOC. (This applies to AOCs MISC 1, MISC 2, MISC 4, MISC 5, PT 1, PT 10, ADD 3, ADD 6, ADD 13, and ADD 14. The first three sentences of the response above</p>

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		DTSC COMMENTS	NAVY/CDM FEDERAL RESPONSE
			have been added to the section for each applicable AOC.).
Specific	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)?	"N/A" listed in Table 4.54-6 for beryllium, selenium, and thallium have been corrected to match those of Table 4.53-10 and Table 3-4.
Specific	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 screening criteria for water, although not the background level. DTSC will defer the decision on the necessity of additional action to the Regional Water Quality Control Board. The Navy should confer with the Water Board for a resolution on this AOC.	See response to RWQCB comment numbers 11 and 14.
Specific	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 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 the RCRA, the California Tiered Permitting program, and Certified Unified Program Agencies (CUPAs).	Incorporated in Table 5-1.
General	6.	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	All soil sample results have now been compared to residential PRGs. At six AOCs (AOC HIST 1, AOC MISC 1, AOC MISC 5, AOC PT 10, AOC ADD 13, and AOC ADD 14), certain

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	<p>assessment of potential contaminant pathways, DTSC believes that the Navy should evaluate the AOCs against both the residential and industrial PRGs, as advised under Section 1.0, 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.</p>	<p>analytes exceed residential PRGs but not industrial PRGs. However, at all six of these AOCs, another sample or other analytes already exceeded industrial PRGs, so these six AOCs were already recommended for further action (five AOCs) or are the responsibility of the City of Long Beach (AOC HIST 1, the Oil Production Areas). Therefore, comparison of soil sample results to residential PRGs has not changed recommendations for any AOCs. However, the exceedances of residential PRGs at these six AOCs has been added to the text in Section 4 for each respective AOC.</p>

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ON THE DRAFT PRELIMINARY ASSESSMENT/SAMPLING REPORT FOR 171 GROUP B AREAS OF CONCERN
LONG BEACH NAVAL SHIPYARD, LONG BEACH, CA**

Comments from Regional Water Quality Control Board (RWQCB) - dated 8 November 1999

	RWQCB COMMENTS	NAVY/CDM FEDERAL RESPONSE
1.	Please update the report, text and tables, to reflect the no further action (NFA) status of the Transportation Yard Associated with Building 54 (AOC MISC 8). NFA was issued for this site in October 1999.	The report, tables, and text have been changed to reflect the NFA status of the Transportation Yard Associated with Building 54 (AOC MISC 8).
2.	Please update Figure ES-1, Figure 2-1 and Figure 5-1 to reflect the NFA status of the 2 AOC sites described in the Draft Addendum report dated August 19, 1999.	The two AOCs (Sanitary Sewer System [SSS 1] and Stormwater System [SWS 2]) described in the Draft Addendum report dated August 19, 1999 are not addressed as part of the 171 AOCs in this report. Rather, they were part of the expedited 25 AOCs study and the NFA status was incorporated into the Final Addendum Report for Nine Group B AOCs, dated October 26, 1999.
3.	Figure ES-1 and Figure 5-1 appear to be the same figure, however, Figure ES-1 indicates that no further action is recommended at 126 sites and Figure 5-1 indicates that no further action is recommended at 125 sites. Please verify which figure provides the correct information and update the final report accordingly.	Figure 5-1 has been changed to 126 AOCs for NFA after the PA was completed.
4.	On Pages 2-3 and 2-6, the report indicates that shallow groundwater underlying the LBNSY is no longer designated by the Los Angeles (LA) Regional Water Quality Control Board (RWQCB) as a potable water source. Please revise this statement to reflect the following: "The Navy has proposed and the RWQCB has agreed, that because the groundwater at the Long Beach Naval Complex meets one of the exceptions in State of California Water Resources Control Board Resolution 88-63, it is not potentially suitable as a source of	Edited as requested by inserting the portion of the comment in quotes.

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	RWQCB COMMENTS	NAVY/CDM FEDERAL RESPONSE
	drinking water and it is unnecessary to remediate the groundwater to protect the beneficial use of municipal or domestic supply. Therefore the RWQCB has determined that the California Ocean Plan is the more appropriate groundwater screening criteria for this site.”	
5.	Figure 4.26-1, the map of the entire sanitary sewer system, is missing from Section 4.26 in the draft document. Please update the final report accordingly.	Included in Final Report.
6.	AOC SSS 4 is located on Figure 1-3, Grid No. C-33 not F-31 as indicated on Table 4.28-1, in Section 4.28.1 of the report. Please update the table to reflect the correct location of this AOC.	The correct grid number is C-33, so Table 4.28-1 has been corrected accordingly.
7.	Section 4.39; the lead concentration detected in the soil sample collected near IR site 11 was above the screening criteria and does not appear to be related to the former and current oil production activities but rather the IR Site 11 activities. The lead contaminated soil needs to be addressed, either under the IR Program or separately. Please revise the recommendations in this section accordingly.	Concur that the lead does not appear to be from oil production activities. Lead was detected in one IR Site 12/13 soil sample in 1996 (approximately 300 feet away from sampling location HI1g sampled under the AOCs Investigation) (BNI 1997a). Section 6.5.1.4 of the RI Report concluded that lead up to 4,200 mg/kg was considered “safe,” based on a human health risk assessment. Because the AOC sample result of 1,820 mg/kg did not exceed this calculated “safe” concentration of 4,200 mg/kg, and the same receptor scenarios apply, no further action is still recommended. This discussion has been added to Section 4.39.7.
8.	AOC IWS 4 is located on Figure 1-3, Grid No. F-34 not E-34 as	The correct grid number is F-34, so Table 4.49-1 has

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	RWQCB COMMENTS	NAVY/CDM FEDERAL RESPONSE
	indicated on Table 4.49-1, in Section 4.49.1 of the report. Please update the table to reflect the correct location of this AOC.	been corrected accordingly.
9.	An NFA letter was issued for USTs 129.8 and 129.9 on October 7, 1999. Please update Section 4.58 of the document, including the text and tables in this section to reflect this NFA status.	Section 4.58 has been updated to reflect that fact that USTs 129.8 and 129.9 have been removed. The RWQCB NFA letter dated 7 October 1999 has been included in Appendix F.
10.	Section 4.58.2, indicates that UST 129.5 is scheduled for removal in Summer 1999. Please clarify if this UST has been issued a closure letter or if it will be completed under the compliance program. Revise the recommendations in Section 4.58.9 to reflect the status of the UST removal.	Section 4.58 has been updated to reflect the fact that UST 129.5 has been removed. A final closure report will be issued in the coming months.
11.	Section 4.188; arsenic was detected at more than twice the Ocean Plan screening criteria in the groundwater sample collected near the floor drain at Building P-11 (AOC ADD 6). AOC ADD 6 is located approximately 500 feet from the Harbor. Based on the location of this site and since only one sample was collected in this area, the extent of this arsenic contamination in the groundwater needs to be defined. Additional groundwater samples need to be collected in order to verify if an arsenic contamination plume exist in this area. Please revise the recommendation and other sections in the document to reflect further action for this AOC.	This sample result (0.021 mg/L) did not exceed the background level of 0.0276 mg/L. The previously-approved RI Report also used the approach that results below background levels (reproduced in Appendix L of this report) do not require further action (see Section 3.2, Appendix E, and Appendix F in BNI 1997a). The reason for this is that "metals occur naturally; therefore, it is necessary to differentiate between naturally occurring (background) concentrations, and concentrations indicative of contamination related to operations at LBNSY" (Section 3.2 in BNI 1997a).
12.	Figure 4.188-4, the map of the sampling location and results, is missing from Section 4.188 in the draft document. Please include	Figure 4.188-4 has been included in the Final Report.

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	this figure in the final report.	
13.	Section 4.189; arsenic was detected at almost triple the Ocean Plan screening criteria in the groundwater sample collected near the sump at Warehouse A (AOC ADD 7). AOC ADD 7 is located approximately 100 feet from the Harbor. Based on the location of this site and since only one sample was collected in this area, the extent of this arsenic contamination in the groundwater needs to be defined. Additional groundwater samples need to be collected in order to verify if an arsenic contamination plume exist in this area. Please revise the recommendation and other sections in the document to reflect further action for this AOC.	See response to Comment number 11 above. This sample result (0.023 mg/L) did not exceed the background level of 0.0276 mg/L.
14.	Section 4.194; mercury was detected in all three groundwater samples collected at the Mercury Gage Repair Area, Building 197 (AOC ADD 12), at 3 to 4 times the Ocean Plan screening criteria. Since all the groundwater samples collected in this area contained elevated levels of mercury, the extent of the mercury contamination in the groundwater needs to be defined. Therefore, additional groundwater samples need to be collected in order to delineate the mercury plume or to determine whether these levels of mercury are the background levels in this area. Please revise the recommendation and other sections in the document to reflect further action for this AOC.	See response to Comment number 11 above. Mercury was detected in site samples at 0.00015, 0.00013, and 0.00010 mg/L, all 6 to 9 times below the background level of 0.00090 mg/L.

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Comments from Environmental Protection Agency (EPA) Region IX - dated 27 September 1999

	EPA COMMENTS	NAVY/CDM FEDERAL RESPONSE
	No Comments.	