

**RESPONSE TO COMMENTS**  
**PROPOSED PLAN/DRAFT REMEDIAL ACTION PLAN**  
**for INSTALLATION RESTORATION PROGRAM SITE 9,**  
**FORMER LONG BEACH NAVAL SHIPYARD, LONG BEACH, CA**  
**CTO-0039**  
**21 AUGUST 2003**

<b>Originator: Sue Hakim, Remedial Project Manager</b> <b>Department of Toxic Substances Control</b>	<b>Date: Letter dated July 14, 2003</b>
<b>COMMENTS</b>	<b>RESPONSES</b>
<b>General Comment.</b> The document is well written, but has a lot of information that is not needed here, which could be eliminated without jeopardizing the integrity of the document and will make it easier to read and much shorter.	Comment acknowledged.
<b>Specific Comments.</b> 1. There is no need to include a Side Box listing all the IR Sites in the Naval Station and Naval Shipyard.	<b>RESPONSE 1:</b> Comment incorporated. A sentence has been added to indicate that Site 9 is one of 15 IR sites at LBNC.
2. Please include an index listing all the different sections included in the PP/Draft RAP document (see the example included in our Public Participation Specialist (PPS)'s memorandum attached).	<b>RESPONSE 2:</b> Comment incorporated.
3. Please include a table listing the maximum concentrations of chemicals of concern found in both soil and groundwater at IR Site 9.	<b>RESPONSE 3:</b> No chemicals of concern (COCs) were identified for soil. TCE and vinyl chloride were identified as COCs for groundwater based on the results of the Supplemental Groundwater Investigation. A table has been added that includes the concentration range, frequency of detection, and frequency of detection above the cleanup goals for the COCs identified in groundwater.
4. Explanation that IR Sites 12 and 13's PP/Draft RAP will be presented in a separate document, and the reason for that decision should be included in this PP/Draft RAP and not just in the cover letter.	<b>RESPONSE 4:</b> Addressing Site 9 in a PP separately from Sites 12 and 13 does not affect or enhance the public review of this document. The PP/Draft RAP for Sites 12 and 13 will also be provided for public review and comment at a future time.
5. Please include, in the Preferred Alternative box on page 1, a brief description of the frequency of monitoring events (monthly, quarterly,...) and what parameters will be measured during the monitoring natural attenuation (MNA).	<b>RESPONSE 5:</b> At this time, the frequency of monitoring is expected to be quarterly and the sampling program will be evaluated on an annual basis. However, the monitoring program will be developed during the remedial design phase.

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<p><b>Originator: Sue Hakim, Remedial Project Manager</b>  <b>Department of Toxic Substances Control</b></p>	<p><b>Date: Letter dated July 14, 2003</b></p>
<p><b>COMMENTS</b></p>	<p><b>RESPONSES</b></p>
<p>6. Page 4 – Human Health Risk Assessment, Step 4 states that “<i>the groundwater beneath Site 9 is too saline (salty) for use as a domestic or industrial water supply</i>”, the Los Angeles Region Basin Plan designated industrial services supply as one of its Groundwater Beneficial Uses.</p>	<p><b>RESPONSE 6:</b> The word “industrial” was deleted. The sentence now indicates that groundwater beneath Site 9 is unsuitable for domestic use.</p>
<p>7. Page 7 – Human Health Risk Assessment Results, please clarify the last sentence as follows: “<i>The risk assessment showed that chemicals in groundwater at Site 9 did not pose a risk to human health (i.e., chemical concentrations did not exceed the generally acceptable risk levels that would require cleanup.)</i>”.</p>	<p><b>RESPONSE 7:</b> Comment incorporated.</p>
<p>8. Page 7 – Risk to the Marine Environment states that “migration of contaminants in groundwater could affect the nearby marine environment... For this reason, further action was recommended to prevent contaminants in groundwater from reaching the SCE dewatering wells.” Please include a brief analysis of the fate and transport done at IR Site 9 to evaluate the ecological risk from the chemicals of concern left on site and how the preferred remedy will be able to protect the environment.</p>	<p><b>RESPONSE 8:</b> Fate and transport modeling was not performed for IR Site 9 because the vadose zone leaching screening analysis indicated that soil COPCs would affect groundwater at or below the California Ocean Plan criteria. Two analytes (TCE and vinyl chloride) exceed the Ocean Plan criteria in groundwater; therefore, monitored natural attenuation is the proposed remedy to assure that these concentrations degrade and do not reach the SCW dewatering wells in concentration that exceed the 1997 Ocean Plan criteria. The sentence was modified as follows: “For this reason, further action is proposed to ensure that contaminants in groundwater do not reach the SCE dewatering wells at concentrations that could impact marine water quality.”</p>
<p>9. Page 12 – Please correct Ms. Ana Veloz-Townsend’s phone number in the contact list as follows: (213) 576-6738.</p>	<p><b>RESPONSE 9:</b> Comment incorporated.</p>

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<b>Originator: Sue Hakim, Remedial Project Manager          Department of Toxic Substances Control</b>	<b>Date: Letter dated July 14, 2003</b>
<b><u>COMMENTS</u></b>	<b><u>RESPONSES</u></b>
<p>10. DTSC has prepared a Notice of Exemption (NOE) document to be public-noticed during the same 30-day comment period as the PP/Draft RAP document. The Draft NOE was forwarded to the Navy, Port of Long Beach, and the regulatory agencies for your review and comments. Please send your comments by July 18, 2003, via electronic mail to: <a href="mailto:shakim@dtsc.ca.gov">shakim@dtsc.ca.gov</a>.</p>	<p><b>RESPONSE 10:</b> The Navy reviewed DTSC's Notice of Exemption and submitted comments on 23 July 2003.</p>

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<b>Originator: Tim Chauvel, Public Participation Specialist Department of Toxic Substances Control</b>	<b>Date: Letter dated July 14, 2003</b>
<b>COMMENTS</b>	<b>RESPONSES</b>
1. Page 1, Figure 1: aerial photograph is blurred, either enhance or replace.	<b>RESPONSE 1:</b> Comment incorporated. The aerial photo was replaced with one of better quality.
2. Page 1: Insert table of contents box with page numbers so that the public can choose the content of the Draft Plan that they want to read first before having to read through the entire Plan. [Example TOC provided].	<b>RESPONSE 2:</b> Comment incorporated (see Page 2 of the PP).
3. Page 1: Change heading "Preferred Alternative" to "Preferred Cleanup Alternative".	<b>RESPONSE 3:</b> Comment incorporated.
4. Page 2, Figure 2: Change color of IR Site 9 boundary imbedded in map from light blue to red so that the reader can easily locate the site. Presently, light blue lines on white and light blue background make it difficult to define site location.	<b>RESPONSE 4:</b> The IR Site 9 boundary has been spelled out on the map to make it easier to locate the site.
5. Page 2: Use larger font size to make heading "Regulatory Framework for Environmental Investigation and Cleanup" easier to read.	<b>RESPONSE 5:</b> Comment incorporated.
6. Page 3: Change heading "IR Site 9" to IR Site 9 History.	<b>RESPONSE 6:</b> Comment incorporated.
Page 3: Change heading "PREVIOUS INVESTIGATIONS" to "PREVIOUS SITE INVESTIGATIONS".	<b>RESPONSE 7:</b> Comment incorporated.

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<b>Originator: Tim Chauvel, Public Participation Specialist          Department of Toxic Substances Control</b>	<b>Date: Letter dated July 14, 2003</b>
<b><u>COMMENTS</u></b>	<b><u>RESPONSES</u></b>
8. Take out cartoon picture of battleship, picture takes up too much space and has no relevance to Site 9.	<b>RESPONSE 8:</b> Comment incorporated.
9. As a final recommendation, I suggest that the following survey is placed at the back of the Plan that requests public feedback concerning the usefulness of the information received. If the public forwards comment, subsequent information can be designed to meet the public's needs. [Example provided]	<b>RESPONSE 9:</b> Comment incorporated. The survey was appended as an option on the same page as the Public Comment Form on Page 15.

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<b>Originator: Legal Counsel, via Martin Hausladen, Project Mgr U. S. Environmental Protection Agency</b>	<b>Date: E-mail received July 28, 2003</b>
<b><u>COMMENT</u></b>	<b><u>RESPONSE</u></b>
On page 14, the text should explain that the preferred alternative, or any selected alternative, will consider ARARs.	Comment incorporated. Language has been added to the second bullet on Page 11 indicating that Alternative 2 complies with the ARARs identified for Site 9.

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<b>Originator: Lee Saunders, Environmental Public Affairs Officer Southwest Division Naval Facilities Engineering Command</b>	<b>Date: E-mail received July 23, 2003</b>
<b><u>COMMENT</u></b>	<b><u>RESPONSE</u></b>
Make sure that this document clearly states that the Proposed Plan satisfies federal requirements and that the draft Remedial Action Plan (RAP) is incorporated to satisfy the state's requirements.	Comment incorporated. A statement has been added on Page 2 indicating that this document also complies with the provisions of Section 25356.1 of the California Health and Safety Code and the PP/RAP definition in the Glossary (page 14) has been expanded.

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<b>Originator: Armando Alvarez, Legal Counsel</b> <b>Southwest Division Naval Facilities Engineering Command</b>	<b>Date: E-mail received July 23, 2003</b>
<b>COMMENTS</b>	<b>RESPONSES</b>
<p>1. The draft PP must meet the minimum requirements identified at 40 CFR 300.430(f)(2). I did not find a summary of the formal (i.e., signed out by the regulatory agency on agency letterhead) comments received from support agency as required by subparagraph (iii). In this case, DTSC and RWQCB are the support agencies whose comments have been received and should be summarized.</p>	<p>1. Comment incorporated. The table on Page 3 discusses Cleanup Partners and comments received from DTSC, RWQCB, and the Port.</p>
<p>2. I advise you to follow EPA's guidance on preparing proposed plans as closely as possible. This will ensure we include all the information considered important by EPA in communicating our planned response to the public.</p>	<p>2. Comment acknowledged.</p>
<p>3. The discussion of cleanup objectives on page 7 is incorrect. Stating that land use controls are part of the remedial response we plan to take based on the fact that we did not evaluate residential human health risk makes the PP not in accordance with law and regulation. The NCP requires remedies to be selected because they meet remedial action objectives.</p>	<p>3. The sentence has been reworded to state: "Land use controls are proposed as part of the remedial action for both soil and groundwater to ensure that land use remains industrial because this property is not suitable for unrestricted use."</p>
<p>4. The Navy, as lead agency, does not use the word "recommended" in its documents.</p>	<p>4. Comment incorporated. The word "recommended" has been replaced by the word "proposed" throughout the document, where appropriate.</p>

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<b>Originator: Christine Houston          Port of Long Beach</b>	<b>Date: E-mail dated July 10, 2003</b>
<b>COMMENTS</b>	<b>RESPONSES</b>
1. It would be helpful if you put a date on Figure 1, since it shows the Navy occupying the site, which has not been the case for several years.	1. The aerial photo has been replaced with a more current one that does not show the Navy occupying the site.
2. References to "future use", especially with regard to Site 9, should be changed to "current use", since this location is part of the active marine terminal (Hanjin). Likewise, references to the "Shipyards" would more accurately be "former Shipyards".	2. Comment incorporated.
3. I find the figures (conceptual models) of potential exposure pathways a little troublesome, especially the scale of them. This site has undergone several feet of clean fill and is currently paved, so the potential for exposure to contaminated soils pretty much ZERO for onsite workers. The utilities were placed into clean fill. You have to dig about 20 feet to get to groundwater; the guy with the jackhammer is never going to get there unless he is a 25-foot-tall guy.	3. The conceptual models reflect what was used to run the risk assessment at the time. The depths to groundwater reflect correct measurements at the time the analyses were done.
4. I strongly object to the statement on Page 8 that there is "widespread petroleum contamination unrelated to site activities" which prevents the use of groundwater for domestic, industrial, or agricultural uses. This groundwater was de-designated by the Regional Board for domestic uses solely because of saltwater intrusion. Further, the Port has no evidence of wide-spread petroleum contamination in any of our properties, including properties that were used for crude oil production. We have plenty of data from 1994 to back this up.	4. Comment acknowledged. The text has been reworded to say: "The naturally high salinity of the groundwater, and impacts from other industrial uses in the area, prevent the groundwater from being suitable for domestic use".

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<b>Originator: Ana Townsend, Water Resources Control Engineer  California Regional Water Quality Control Board</b>	<b>Date: Letter dated July 16, 2003</b>
<b>COMMENTS</b>	<b>RESPONSES</b>
<p>1. The draft PP/RAP, on page 4 indicates that the Remedial Investigation concluded that contaminants in groundwater could affect the nearby marine environment. Please clarify in the PP/RAP how the Navy arrived with this result.</p>	<p><b>RESPONSE 1:</b> See Response to Comment #8 (DTSC, S. Hakim)</p>
<p>2. The draft PP/RAP, on page 6 indicates that the groundwater beneath IR Site 9 is too saline for use as a domestic or industrial water supply. Only the designation of municipal and domestic supply (MUN) beneficial use for the underlying groundwater at the former Long Beach Naval Shipyard has been removed from the Water Quality Control Board-Los Angeles Region Basin Plan (Basin Plan). The Basin Plan still retains the beneficial uses of Industrial Process Supply (PROC), Industrial Service Supply (IND), and Agricultural Supply (AGR) for the underlying groundwater. Please revise the draft PP/RAP to reflect the above.</p>	<p><b>RESPONSE 2:</b> See Response to Comment #6 (DTSC, S. Hakim). The word "industrial" was deleted.</p>
<p>3. The draft PP/RAP, on page 7 indicates that for soil and groundwater actions, when groundwater is not a potential source of drinking water, U.S. EPA Preliminary Remedial Goals and site-specific risk-based concentrations for specific chemicals and media are used to gauge whether remedial action is warranted. For the Long Beach Naval Complex, the State Water Resources Control Board, Ocean Plan (2001), has also been used to determine if remedial action is warranted for the underlying groundwater. Please update the PP/RAP to reflect the above.</p>	<p><b>RESPONSE 3:</b> The discussion on Page 6 addresses human health. The wording has been changed to say: "To evaluate risk to human health, U.S. EPA Preliminary Remediation Goals (PRGs) typically are used as screening criteria to determine if remedial action is necessary. In the case of Site 9, where groundwater is not a potential drinking water source, site-specific risk-based concentrations for specific chemicals or media (soil or GW) are used to develop numerical cleanup goals for the site".</p> <p>Ocean Plan criteria are relevant to the potential risk to marine life and are mentioned in both the text and in Table 3 (as a footnote) on Page 7.</p>

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<b>Originator: Ana Townsend, Water Resources Control Engineer California Regional Water Quality Control Board</b>	<b>Date: Letter dated July 16, 2003</b>
<b>COMMENTS</b>	<b>RESPONSES</b>
<p>4. On page 10 of the PP/RAP, numerical remediation goals were developed for two volatile organic compounds (VOCs) in groundwater at IR Site 9 to meet the cleanup objectives. Table 3, <i>Groundwater Remedial Goals for IR Site 9</i>, should include all chemicals of concern identified on site, including tetrachloroethylene (PCE) and 1,1-dichloroethene (1,1-DCE). These chemicals should also be monitored to assist in determining when cleanup is complete. Please revise Table 3 accordingly.</p>	<p><b>RESPONSE 4:</b> Although the Supplemental Groundwater Investigation identifies TCE, PCE, 1,1-DCE, and vinyl chloride as exceeding their respective site screening levels, these determinations were based on the 1995 Ocean Plan criteria. Using the 1997 Ocean Plan criteria, only TCE and vinyl chloride exceed the screening criteria, as presented in the Feasibility Study. A table was added that includes the concentration range, frequency of detection, and frequency of detection above the cleanup goal for the COCs identified in groundwater.</p>
<p>5. On page 11, of the PP/RAP, please revise the paragraph which begins with Remedial Alternatives proposed for groundwater... to reflect beneficial uses identified in this Regional Board's Basin Plan as stated above in our comment no. 2.</p>	<p><b>RESPONSE 5:</b> See Response to Comment #2, above.</p>
<p>6. Please correct the telephone number in the contact list on page 15, for Ana Townsend to (213) 576-6738.</p>	<p><b>RESPONSE 6:</b> Comment incorporated.</p>



BECHTEL ENVIRONMENTAL, INC.

CLEAN 3 TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-95-D-7526

Document Control No. CTO-0039/0048

File Code:0232

TO Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Ms. Karen Rooney, Code 02R1
1220 Pacific Highway
San Diego, CA 92132-5190

DATE: August 25, 2003
CTO #: 039
LOCATION: Former LBNSY

FROM: Robert J. Tait, Project Manager

DESCRIPTION: Response to Comments on Draft Proposed Plan/Draft Remedial Action Plan
Installation Restoration Program Site 9 - Dated August 2003

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Date/Time Received



CLEAN 3 Program  
Bechtel Job No. 23818  
Contract No. N68711-95-D-7526  
File Code: 0232  
**IN REPLY REFERENCE: CTO-0039/0048**

August 25, 2003

Contracting Officer  
Naval Facilities Engineering Command  
Southwest Division  
Ms. Karen Rooney, Code 02R1  
1220 Pacific Highway  
San Diego, CA 92132-5190

Subject: Response to Comments on Draft Proposed Plan/Draft Remedial Action Plan,  
Installation Restoration Program Site 9, Former Long Beach Naval Shipyard,  
Long Beach

Attention: *M. Orpilla, 06CM.MO, Contracting Specialist*

Dear Ms. Rooney:

On behalf of the Navy, Bechtel Environmental, Inc. (BEI) is submitting the Response to Comments on the Draft Proposed Plan/Draft Remedial Action Plan, Installation Restoration Program Site 9, Former Long Beach Naval Shipyard, Long Beach, dated 22 August, 2003.

The Navy RPM, Ms. Jennifer Valenzia, has transmitted electronic and hard copies of the response to comments to the appropriate participating agencies under a separate cover. These copies are intended for the Administrative Record and the Navy.

If you have any questions regarding this transmittal, please contact Elizabeth Barr at (619) 744-3037 or me at (619) 744-3078.

Sincerely,

Robert J. Tait  
Project Manager

RJT/EB/lsh  
Enclosure



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

5090  
Ser 06CA.JV/1214  
August 22, 2003

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

Dear Ms. Hakim:

Subj: RESPONSE TO COMMENTS ON THE DRAFT PROPOSED PLAN/DRAFT  
REMEDIAL ACTION PLAN, INSTALLATION RESTORATION PROGRAM  
SITE 9, FORMER LONG BEACH NAVAL SHIPYARD, LONG BEACH

Enclosed for your review are responses to your comments on the Draft Proposed Plan/Draft Remedial Action Plan (PP/RAP) for Installation Restoration (IR) Program Site 9, Former Long Beach Naval Shipyard, Long Beach, California (Enclosure 1).

Please send confirmation that your comments have been satisfactorily addressed to Jennifer Valenzia by September 1, 2003. If you have any questions, please contact Ms. Valenzia at (619) 532-0919.

Sincerely,

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

THOMAS L. MACCHIARELLA  
BRAC Environmental Coordinator  
By direction of the Commander

Encl: (1) Response to Comments on the Draft Proposed Plan/Draft Remedial Action Plan, Installation Restoration Program Site 9, Former Long Beach Naval Shipyard, Long Beach, California

Copy to:  
Mr. Tim Chauvel  
California Environmental Protection Agency  
Department of Toxic Substances Control  
5796 Corporate Way  
Cypress, CA 90630

5090  
Ser 06CA.JV/1214  
August 22, 2003

Ms. Ana Veloz-Townsend  
California Regional Water Quality Control Board  
Los Angeles Region  
320 W. 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Ms. Christine Houston  
The Port of Long Beach  
P.O. Box 570  
Long Beach, CA 90801