

**RESPONSE TO AGENCY COMMENTS ON DRAFT SAMPLING PLAN (DCN SW2508)  
 SOIL REMOVAL AND CONFIRMATION WELL INSTALLATION BUILDING S-4 BOILER PLANT  
 LONG BEACH NAVAL SHIPYARD, LONG BEACH, CALIFORNIA  
 SWDIV CONTRACT NO. N68711-93-D-1459 DELIVERY ORDER 0083  
 OHM PROJECT NO. 19022, DCN SW2746**

Comment No.	Section/Page Number	Agency Comment	OHM Response
<b>General Note on Comments:</b>			
<p>Comments were received from Hugh Marley of the California Regional Water Quality Control Board (RWQCB) in a letter to Kurt Baer, Southwest Division Naval Facilities Engineering Command (SWDIV) dated November 8, 1996. The potential response to the comments were discussed with Kurt Baer on November 14, 1996. The proposed responses were verbally discussed with Hugh Marley, RWQCB, on November 14, 1996. Mr. Marley agreed to the proposed responses and verbally authorized OHM to proceed with the Sampling Plan on November 20, 1996. The formal response by OHM are given below.</p>			
<b>Draft Sampling Plan Comments from Hugh Marley, RWQCB:</b>			
1	General	<p>The work plan should include alternative soil and groundwater sampling locations in, or to the north (downgradient) of Building S-4.</p>	<p>The scope of the Sampling Plan is solely to identify the extent of impacted soil and groundwater in order to allow the soil removal to be planned. In particular, the sampling program is designed to identify if the contamination extends beneath either adjacent building. This scope will be clarified by changing the introduction to read:</p> <p>“The objective of this Sampling Plan is to determine whether petroleum hydrocarbon contamination in soil and groundwater extends beneath the buildings adjacent to the site. This information will be used to complete a work plan for soil removal activities.”</p> <p>In addition, the fourth bullet in the scope of work will be modified to read:</p> <p>“determine whether the hydrocarbon contamination of soil and groundwater extends beneath the adjacent buildings.”</p>

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2	Background	The underground storage tank (UST) T-4, also associated with this site, was removed in 1993. Include, in the work plan, any available information on the conditions of the soil and groundwater below this UST. Confirmation samples may be required at the former UST T-4 site.	All available information regarding the conditions of the soil and groundwater below UST T-4 will be included in the Work Plan to be prepared for the soil removal. Additional documentation from the Navy and the CLEAN contractor will be requested regarding this UST closure.
3	Scope of Work	Identify the ultimate plans for UST T-2, T-3, and T-6. If tank removal is proposed, include a schedule in the workplan. Also state whether the proposed geophysical investigation will be used to locate the missing UST T-5. Identify plan of action should UST T-5 be located.	The scope of the current project is to remove soil from the vicinity of the former location of UST T-1. Contingency plans for handling any subsurface features uncovered during the UST removal will be addressed in the Work Plan.

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4	Scope of Work	The extent of floating product, at this site, has not been identified. The direct-push sampling results may be used to identify the appropriate limits of free product and dissolved groundwater plumes, however, groundwater monitoring wells will be required. Address groundwater monitoring well installation and construction details in this work plan. We do not object to the use of narrow-gauge monitoring wells.	The number and location of the monitoring wells will be assessed based on the results of the direct-push sampling. The proposed plan for monitoring well installation will be included in the Work Plan for the soil removal.
5	Scope of Work	This site appears to be suitable for characterization using the Navy's Site Characterization and Analysis Penetrometer System with Laser Induced Fluorescence (SCAPS-LIF) system. We, therefore, do not object to the use of SCAPS-LIF technology.	OHM explains: The availability of the SCAPS-LIF system was queried by OHM regarding sampling at various LBNSY sites. According to the SCAPS-LIF representatives, the SCAPS-LIF system would not be available until January 1997, which would delay the project.