



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

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NSY LONG BEACH
SSIC #5090.3

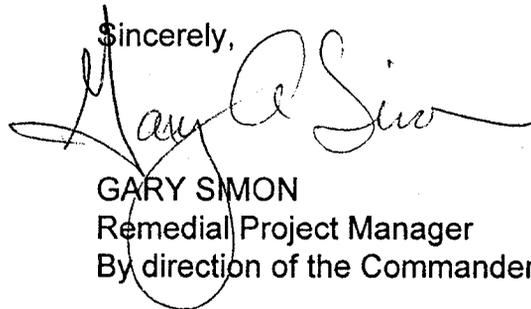
5090
Ser 56LB.GS/075
November 6, 1996

Mr. Hugh Marley
Los Angeles Region
California Regional Water Quality Control Board
101 Centre Plaza Drive
Monterey Park, CA 91754-2156

Dear Mr. Marley:

Enclosure (1) reflects the agreements made during our meeting of September 18, 1996 at Long Beach Naval Complex and contains specific response action for each of the concerns raised in your September 17, 1996, response to our proposed workplan. Based on our subsequent discussions, we anticipate that you will find our response actions to satisfactorily address each of the concerns you raised. Please notify the undersigned by phone, fax or E-mail at (619) 532-2537, (619) 532-2469, or gasimon@efdswest.navfac.navy.mil respectively at your earliest convenience should this not be the case.

Sincerely,



GARY SIMON
Remedial Project Manager
By direction of the Commander

Encl:

(1) Responses to Regional Water Quality Control Board Los Angeles Region
Comments on the proposed Workplan

Copy to:

Mr. Alvaro Guitterez
Department of Toxic Substances Control
245 West Broadway, Suite 425
Long Beach, CA 92802-4444

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Commander
Attn: CDR Anthony DiDomenico
Caretaker Support Officer
Long Beach Naval Shipyard
300 Skipjack Road
Long Beach, CA 90822-5099

Mr. Martin Hausladen
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street (H-9-1)
San Francisco, CA 92105-3901

Commander
Attn: Ms. Anna Ulaszewski (Code 100BEC)
Long Beach Naval Shipyard
300 Skipjack Road
Long Beach, CA 90822-5099

NRaD
SCAPS Operations Manager
59560 Hull Street
San Diego, CA 92152-5001

ENCLOSURE A

RESPONSES TO REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION COMMENTS ON THE PROPOSED WORKPLAN SITE CHARACTERIZATION AND ANALYSIS PENETROMETER SYSTEM PROJECT LONG BEACH NAVAL SHIPYARD LONG BEACH, CALIFORNIA

This document presents the response to comments received from the California Regional Water Quality Control Board (RWQCB) Los Angeles Region on the proposed work plan for the Site Characterization and Analysis Penetrometer System (SCAPS) Project at the Long Beach Naval Shipyard (LBNSY). The comments were received in a letter from the RWQCB to Mr. Gary Simon, Southwest Division Naval Facilities Engineering Command, (SWDIV) dated September 17, 1996 and at the September 18, 1996 meeting held at LBNSY. Meeting attendees included: Hugh Marley (RWQCB); Gary Simon Southwest Division Navy Engineering Command (SWDIV); Tom Hampton (Naval Command, Control and Ocean Surveillance Center Research, Development, Test and Evaluation Division [NCCOSC RDT&E]); Peter Stang (PRC Environmental Management, Inc. [PRC]); and Greg Alyanakian (PRC). To facilitate review of these responses, each RWQCB comment is in bold before the response.

RESPONSE TO COMMENTS FROM THE RWQCB

General Comments

1. **Comment:** The soil cleanup levels of 10,000 milligrams per kilogram (mg/kg) stated in section 1.4 is for total petroleum hydrocarbon (TPH) as diesel only. The soil cleanup levels for TPH gasoline in soil is 1,000 mg/kg.

Response: Comment is noted as discussed at September 18, 1996 meeting.
2. **Comment:** Section 2.2.2 should also state that the site is underlain by up to 20 feet of hydraulic fill.

Response: Comment is noted as discussed at September 18, 1996 meeting.
3. **Comment:** Section 2.2.3 should reference the groundwater elevations detailed in the Remedial Investigation (RI) document. The depth to groundwater varies significantly from the 8 feet quoted.

Response: Comment is noted. The RI document indicates that depth to groundwater varies from site to site within the Long Beach Naval Shipyard.
4. **Comment:** The RWQCB is not familiar with the practice of using compressed air to expose the CPT groundwater sampling probe's screen. Of concern is the volatilizing effect of compressed air on a CPT groundwater sampling probe's limited sphere of influence.

Response: The CPT groundwater sampling probe's limited sphere of influence was discussed in the meeting on September 18, 1996. After some discussion, all parties agreed to using a manual method of opening the CPT groundwater sampling probe screen to obtain water samples. Additionally, it was also agreed that no groundwater samples will be obtained using the compressed air sampling technique during this project. When soil conditions require significant time for sample volume to percolate (more than two hours) a temporary PVC well will be used.

5. **Comment:** Section 4 is missing the description and the proposed scope of work for the Building 7 UST site.

Response: A description of Building 7 and the proposed scope of work for the site are included on page 14 of the proposed work plan.

6. **Comment:** The work plan indicates that the SCAPS unit will identify and characterize sites with existing and suspected USTs. The SCAPS characterization will then be verified using soil samples. However, when the USTs are then excavated, as planned, more soil samples will be collected, as required by the Fire Department. The work plan should be modified to eliminate any redundant soil sampling and analysis.

Response: SCAPS soil sampling methodology was discussed during the meeting held on September 18, 1996. For the LBNSY project, SCAPS will collect laser-induced fluorescence (LIF) data to determine lateral and vertical limits of any contamination found. The SCAPS unit will also collect a minimum number of soil samples to support No Further Action recommendations at sites where contamination below action levels is suspected, and to confirm the presence or absence of other contaminants which could be present and are not detectable by LIF. This information will be used to distinguish petroleum-only contaminated sites from those with combined wastes, for which different remediation technologies and different Navy contract options may be appropriate. In this manner, redundant sampling will be minimized and will only be performed where added value to the closure process will be derived.

7. **Comment:** The work plan must include, or reference an approved Health and Safety Plan.

Response: The comment is noted and the SCAPS Health and Safety Plan, reviewed and approved by the NCCOSC RDT&E Division Safety office, is attached for your review.

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Writer: G. Simon, Code 56LB.GS, x2-2537
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