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NSY LONG BEACH
SSIC # 5090.3

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March 24, 1998

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DRAFT PRELIMINARY ASSESSMENT (PA) FOR 25 GROUP B AREAS OF CONCERN (AOCs) AT LONG BEACH NAVAL SHIPYARD, LONG BEACH CALIFORNIA (FILE No. 90-75)

We have received and reviewed the Draft PA for 25 Group B Areas at the Long Beach Naval Shipyard, dated February 19, 1998. Our comments are as follows:

- Section 4.1.1 states that the force mains could not be videotaped or inspected as they are continuously under pressure. Discuss and address the feasibility of determining line integrity using a hydrostatic pressure test on the force main.

- Section 4.3.1 states that much of the storm drains surveyed were clogged with sediment and oily buildup. These areas should be located on a site map and included in the sampling plan.

- The PA indicates that only a limited number of dry-dock dewatering pumps are functioning. Indicate whether any pump-sumps, particularly from non-operating pumps, or pumps that have been removed, are accessible for sampling. Sediment from these sumps should be sampled for chemicals of concern(CoCs).

- Section 4.7 should also address the use, storage, and disposal of any solvents or resins that were part of the Building 98 fiberglass assembly operations.

- Section 4.8 assumes that the buried sludge pit has not impacted groundwater. Include or reference groundwater monitoring data relevant to the site. Indicate whether an impact to groundwater is apparent. Propose groundwater sampling to close data gaps, if any.

- Section 4.14 addresses a waste aerosol solvent storage area. Please provide a definition for "waste aerosol solvent."

- No further action is recommended for the three AOCs (SAP 148, 149, and 150) adjacent to Building A. However, the PA states that a 1,000 gallon oil spill was reported to have occurred in the vicinity of the three SAPs. Based on the above, we believe, that as a minimum, soil confirmation sampling should be proposed at these sites.

If you have any questions regarding the above, please contact Hugh Marley at (213) 266-7669.

J.E. ROSS, Unit Chief
Site Cleanup Unit

cc: Alvaro Guitterez, Department of Toxic Substances Control
Martin Hausladen, Environmental Protection Agency
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COMMENTS ON THE DRAFT PRELIMINARY ASSESSMENT REPORT FOR 25 GROUP B AREAS OF CONCERN LONG BEACH NAVAL SHIPYARD

GENERAL COMMENTS

1. There are many items listed in Figure 2-1 of the *Guidance for Performing Preliminary Assessments Under CERCLA* that are not included in the text. The following items should be addressed (also see comments on Appendix A for additional items) in the text:

   - For Soil Exposure:
     - Number of people living within 200 feet.
     - Schools or day care within 200 feet.
     - Population within 1 mile.
     - Number of workers at facility.
     - Locations of terrestrial sensitive environments.
   - For Air Pathway:
     - Population within 4 miles.
     - Distance to nearest individual.
     - Locations of sensitive environments within 4 miles
     - Acreage of the wetlands within 4 miles.

2. In general, there is little discussion of the activities conducted at many of the sites before 1990. This information should be included for the SAP sites, HWF-5, HIST 3, HIST 5 and MISC 9. In addition, it is unclear if some of the SAP sites were used for materials or waste storage prior to their formal designations as SAPs. Please clarify these issues, expanding the descriptions in the text when possible.

SPECIFIC COMMENTS

1. **Section 3.2.** Because few documents prepared prior to 1990 exist, there is considerable uncertainty about chemical storage and use, disposal methods, and spills; this uncertainty should be stated both here and in the site-specific discussions.

AOC SSS-1

1. **Section 4.1.1, p. 4.1-2 and Figure 4.1-1.** The exact locations of the breaks in the sewer lines on the figure and the correlation with the bullets on page 4.1-2 could be clearer. Please number the breaks in the text and on the figure, and specifically indicate the locations of the breaks and problem areas in different color on Figure 4.1-1. Since this is already a color figure, use of a third color should not add to the expense of reproducing the figure and would make the figure much clearer to the reader.

2. **Section 4.1.1, p. 4.1-2, last paragraph.** This statement conflicts with Figure 4.1-1 which shows a Force Main Break. Please explain how the Force Main Break was found if the force mains could not be video taped or inspected. Also, it should have been possible to inspect the main when it was closed for repairs, if this was not done, the lack of inspection should be explicitly stated.

3. **Section 4.1.2, p. 4.1-3, paragraph 3.** Please specify the "pretreatment measures," (i.e., discuss specific chemicals and/or processes that were used).

AOC SWS-2

1. **Section 4.3.4, p. 4.3-4.** Two or three sediment samples should be collected from catch basins in other areas so that the implied assumption that the greatest impact is from the "heaviest industrial areas" can be tested. Because the historical spill reports and industrial waste reports from Long Beach are unavailable prior to 1990, it is not reasonable to assume that the only impact is from heavy industrial areas; this assumption must be proven.

DD-1

1. **Section 4.4.2, p. 4.4-3, last paragraph.** Copper was an historic antifouling additive to paint and is often found in spent sandblast grit. Because the copper used as an antifouling additive dissolves readily, it is also possible that the reason the NPDES copper limit was exceeded was dissolution from paint chips in spent sandblast abrasive that had accumulated in the drydock or drydock tunnels.

2. **Section 4.4.2.** There is no discussion of the amount of material in the drainage tunnels. At other Navy shipyards, these tunnels have significant sediment and paint buildups. The amount of sediment must be described; this information should be available, but if necessary, manholes and catch basins must be opened and re-examined to obtain this critical information.

3. **Section 4.4.4.** There is no scientific basis for the conclusion in the last sentence. Based on sediment sampling conducted in drainage and discharge tunnels at other Navy shipyards, the sediment in the tunnels is likely contaminated with copper, mercury, zinc, organotins (historic antifouling additives), lead, PAHs, and PCBs. These contaminants pose significant risk to aquatic life. The sediment must be tested before it can be concluded that the sediment will not "cause a significant" environmental threat.

DD-2

1. **Section 4.5.2, p. 4.5-2.** There is no discussion of the amount of material in the drainage tunnels. At other Navy shipyards, these tunnels have significant sediment and paint buildups. The amount of sediment must be described; this information should be available, but if necessary, manholes and catch basins must be opened and re-examined to obtain this critical information.

2. **Section 4.5.4, p. 4.5-3.** There is no scientific basis for the conclusion in the last sentence. Based on sediment sampling conducted in drainage and discharge tunnels at other Navy shipyards, the sediment in the tunnels is likely contaminated with copper, mercury, zinc, organotins (historic antifouling additives), lead, PAHs, and PCBs. These contaminants pose significant risk to aquatic life. The sediment must be tested before it can be concluded that the sediment will not "cause a significant" environmental threat.

DD-3

1. **Section 4.6.2, p. 4.6-1.** There is no discussion of the amount of material in the drainage tunnels. At other Navy shipyards, these tunnels have significant sediment and paint buildups. The amount of sediment must be described; this information should be available, but if necessary, manholes and catch basins must be opened and re-examined to obtain this critical information.

2. **Section 4.6.4, p. 4.6-3.** There is no scientific basis for the conclusion in the last sentence. Based on sediment sampling conducted in drainage and discharge tunnels at other Navy shipyards, the sediment in the tunnels is likely contaminated with copper, mercury, zinc, organotins (historic antifouling additives), lead, PAHs, and PCBs. These contaminants pose significant risk to aquatic life. The sediment must be tested before it can be concluded that the sediment will not "cause a significant" environmental threat.

HWF-5

1. **Section 4.7.2.** Please describe the interior of the building at present; describe whether there is any evidence of asbestos in the building. Discuss the condition of the vents and blowers and whether there is any asbestos residue in the vent system. Discuss whether the vents and blowers were cleaned during renovation; if this information is unavailable, the vents and blowers must be inspected.

   Also, discuss whether there is any asbestos residue in SAP 98-64-1.

2. **Section 4.7.4, p. 4.7-4.** Air sampling for asbestos should be considered before this building is transferred.

HIST 3

1. **Section 4.8.2.** Please provide a more complete description of the sludge and likely chemical constituents. Discuss whether any other chemicals were used in the building.

MISC 9

1. **Section 4.10.1, p. 4.10-1, last paragraph and Figure 4.10-1.** The groundwater flow direction is not shown on Figure 4.10-1 as stated in the text, but the surface water runoff directions are depicted on this figure. Please revise that text and/or figure for consistency.

2. **Figure 4.10-1.** Please label the small square area located west of the paint booth.

3. **Section 4.10.4, p. 4.10-4.** The area near Building 5 where small parts were cleaned before being taken inside (Section 4.10.2, p. 4.10-3, paragraph 1) should also be investigated. Solvents were historically used at many facilities for small parts cleaning, so there is potential that solvents were released in this area. A limited soil and groundwater sampling program should be recommended for this area near Building 5.

SAP 7

1. **Section 4.15.2, p. 4.15-2.** Please specify the type of batteries stored (e.g., clarify whether these were vehicle batteries or some other type of batteries). Batteries are not normally stored in drums. Please confirm that batteries were stored in a drum.

SAP 24

1. **Section 4.16.2, p. 4.16-2.** Please specify the period when lawn mower repair and sheet metal fabrication occurred. Explain how it is known that PCBs were not used in cutting or quench oil in the sheet metal shop. If this is not known, sampling should be considered.

SAP 149

1. **Table 4.18-1 and Section 4.18.1.** Please describe the secondary contaminant listed in the structures column of Table 4.18-1.

SAP 151

1. **Figure 4.20-1.** Please label Building 106 on Figure 4.20-1.

UST 6

1. **Section 4.23.2, p. 4.23-2. last paragraph.** Given the age of Tanks 363 and 364, it is likely that the transformer oil contained PCBs. Please provide additional information about the soil testing for PCBs.

2. **Section 4.23.2, p. 4.23-3, paragraph 5.** Please discuss the extent of PCB testing that will be conducted as part of the UST program.

3. **Section 4.23.4, p. 4.23-4.** Please discuss the specific actions to be taken at Tanks 363 and 364. Soil samples should be analyzed for PCBs; these samples should be collected from tank excavations and also from trenches from which underground piping will be removed.

UST 15

1. **Section 4.24.2.** Please briefly discuss the analytical results from soil samples that were collected during tank closure.

UST 18

1. **Section 4.25.2.** Please briefly discuss the analytical results from soil samples that were collected during closure of Tank 162.1. This will support the recommendation for no further action.

Section 6

1. **Section 6.1, p. 6-1.** Please discuss whether the Port of Long Beach intends to maintain LBNSY as a limited access area. The Navy will not likely be able to control future public access so the current condition "inaccessible to the public" should not be assumed to continue. It is possible that the soil exposure pathway may exist in the future.

2. **Section 6.4.** The description of HWF-5 was not sufficient to preclude the potential for inhalation of asbestos. Asbestos may be present in air ventilation system vents and blowers and in SAP 98-64-1.

3. **Section 6.5.** Based on review of the information provided in this PA, potentially complete pathways also occur at SWS-2 (non-catch basin areas), DD-1, DD-2, DD-3, HWF-5, and the area of MISC 9 near Building 5 where small parts were cleaned. Sampling should be done in these areas. Soil samples from the Tank 363 and 364 areas should be analyzed for PCBs. This information should be added to Table 6-1.

Section 7.0

1. **Section 7.0 and Table 7-1.** Sampling should also be recommended at AOC SWS-2 (non-catch basin areas for the listed parameters), DD-1 (VOCs, SVOCs, PAHs, TPH, PCBs, metals, and organotins), DD-2 (VOCs, SVOCs, PAHs, TPH, PCBs, metals, and organotins), DD-3 (VOCs, SVOCs, PAHs, TPH, PCBs, metals, and organotins), HWF-5 (asbestos) MISC-9 near Building 5 (VOCs, TPH, metals), and Tanks 363 and 364 at UST 6 (PCBs).

2. **Table 7-2.** The recommendations for the sites listed in the previous comment should be changed to include sampling.

Appendix A

1. **Section 4.1.3 or 4.1.6.** Please state the depth to the shallowest aquifer, in accord with Figure 2-1 of the *Guidance for Performing Preliminary Assessments under CERCLA* (PA Guidance). Groundwater at LBNSY is found above the Gaspur Aquifer, so this section is incomplete without discussing all occurrences of groundwater.

2. **Table 7-2.** The recommendations for the sites listed in the previous comment should be changed to include sampling.

Appendix A

1. **Section 4.1.3 or 4.1.6.** Please state the depth to the shallowest aquifer, in accord with Figure 2-1 of the *Guidance for Performing Preliminary Assessments under CERCLA* (PA Guidance). Groundwater at LBNSY is found above the Gaspur Aquifer, so this section is incomplete without discussing all occurrences of groundwater.

2. **Section 4.1.9.** Clarify whether there are any private wells within a 4-mile radius. Also, provide a map showing the location of the two active municipal water supply wells and the 11 active industrial water supply wells.

   The text should also specify the distance to the nearest drinking water well and discuss whether there are any wellhead protection areas (see Figure 2-1 in the PA Guidance).

3. **Section 4.3.** This section must include a discussion of all fisheries with 15 miles and also include a discussion of any sensitive environments (marine) within 15 miles (see Figure 2-1 of the PA Guidance).

Appendix B

1. There are a number of acronyms in this list that are not defined (e.g., DFM, CHT, VLT). Please provide a list of acronyms and definitions used in this appendix to this appendix or add these additional acronyms and definitions to the main list of acronyms in the front matter of this report.