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NSY LONG BEACH
SSIC # 5090.3

Cal/EPA

April 28, 1998

Pete Wilson
Governor

Department of
Toxic Substances
Control

Peter M. Rooney
Secretary for
Environmental
Protection

5796 Corporate Ave.
Cypress, CA
90630-4700

Mr. Kurt Baer
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway, Room 18
San Diego, California 92132-5181

Dear Mr. Baer:

DRAFT WORK PLAN GROUP B AREAS OF CONCERN (AOCs) PRELIMINARY ASSESSMENT/SITE INSPECTION (PA/SI) LONG BEACH NAVAL SHIPYARD, LONG BEACH, CALIFORNIA

DRAFT WORK PLAN ADDENDUM No. 1 FOR GROUP B AREAS OF CONCERN

The California Department of Toxic Substances Control (DTSC) has completed its review of the *Draft Work Plan, Group B Areas of Concern (AOCs), Preliminary Assessment/Site Inspection (Draft PA/SI) Long Beach Naval Shipyard, Long Beach, California*, dated February 25, 1998 and received by DTSC on March 16, 1998. An addendum to this work plan was received on April 22, 1998. The *Draft PA/SI* was prepared by CDM Federal Programs Corporation for Southwest Division Naval Facilities Engineering Command

The *Draft PA/SI* presents Group B; this includes 182 AOCs which are addressed in this work plan. DTSC notes that the *Draft PA/SI* also lists the 25 AOCs being fastracked to facilitate reuse. Please delete the 25 AOCs from Table 1-1, as these AOCs will not be addressed in this work plan. For Table 1-2, the table lists "15" AOCs to be addressed but the text states "16". Please clarify or correct the number of AOCs to be listed in Table 1-2. DTSC recommends that the field sampling plan be removed from Appendix A and placed in the main body of the document, as it is an essential part of the work plan. Finally, DTSC, in agreement with EPA, requests that the *Draft PA/SI* be renamed to "PA". The *Draft PA/SI* does not fulfill the requirements of a Site Inspection, but does fulfill those of a Preliminary Assessment under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

On April 20, 1998, DTSC received a *Draft Work plan Addendum No.1 (Addendum No.1)* which added eight additional AOC's from the Preliminary Assessment conducted on the 25 AOC's to this *Draft PA/SI*. DTSC has two comments on the *Addendum No.1*, noted as follows: 1) In Figure 6 of the *Addendum No. 1*, there is an X which is circled. Please delete or clarify as this figure is not in the legend.

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2) DTSC has the same concern as comment # 1 from EPA comments. Please incorporate the additional information as requested above in the final version of these documents.

DTSC also has reviewed and is in agreement with U.S. Environmental Protection Agency comments; these have not been repeated to avoid duplication of effort. Furthermore, DTSC requests that the Navy meet with their contractor and agencies to discuss the need for improved document quality and presentations. If you have any questions, please contact me at (714) 484-5417.

Sincerely,



Alvaro Gutierrez
Base Closure Team Member
Southern California Region
Base Closure Unit
Office of Military Facilities

cc: Ms. Sharon Fair
Unit Chief
Base Closure Unit
Office of Military Facilities
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

Mr. Aaron Yue
Base Closure Unit
Office of Military Facilities
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

Ms. Jennifer Rich
Public Participation Specialist
Office of Military Facilities
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

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cc: Mr. J. E. Ross
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Mr. Alan Lee
Base Environmental Coordinator
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5181

Mr. Martin Hausladen
Remedial Project Manager
Hazardous Waste Management Division (H-9-2)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105