



Cal/EPA

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Quality Control
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April 29, 1998

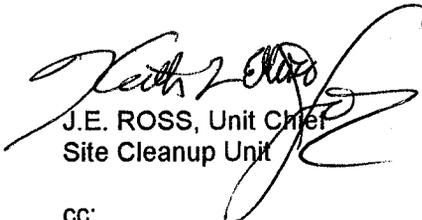
**Commander
Southwest Division, Naval Facilities Engineering Command
Code 56LB.KB (Kurt Baer)
1220 Pacific Highway
San Diego, CA 92132-5190**

DRAFT WORKPLAN AND WORKPLAN ADDENDUM NO. 1 - GROUP B AREAS OF CONCERN (AOCs) PRELIMINARY ASSESSMENT/SITE INSPECTION, LONG BEACH NAVAL SHIPYARD, LONG BEACH CALIFORNIA (FILE No. 90-75)

We have received and reviewed the *Draft Workplan* and the *Workplan Addendum No. 1 - Group B AOCs, Long Beach Naval Shipyard*, received by us on March 16, 1998, and April 22, 1998, respectively. Staff also discussed the draft workplan with the Navy and their contractors on April 8, and participated in a site walk on April 15, 1998. Deficiencies noted in the *Draft Workplan* during the above referenced meeting and site walk, have, for the most part, been addressed in the *Workplan Addendum*. The final document should address the following additional comments:

- Figure 5.2 in the Draft Workplan indicates that a Human Health Risk Assessment is the only action recommended if groundwater contamination is present at concentrations that exceed the screening criteria established for the site. Note that if the screening criteria for shallow groundwater at this site is exceeded, groundwater remediation, contaminant source identification and contaminant source removal must be addressed.
- The dry-dock dewatering wells may provide a conduit between the shallow and underlying aquifers. We understand that not all dewatering pumps are in operation, and certain pumps have been removed. Contaminants from past dry-dock and pump operations may have collected in these sumps. As discussed in the April 8, 1998 meeting, identify pumps that have been removed and include pump-sump sediment sampling in the workplan.

You are authorized to implement the workplan with the inclusion of the above comments. 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
Alan Lee, Southwest Division

N60258.000998
NSY LONG BEACH
SSIC # 5090.3

Pete
Wilson
Governor



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.

Mr. Kurt Baer
April 28, 1998
Page 2

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
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Mr. Kurt Baer
April 28, 1998
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Mr. Martin Hausladen
Remedial Project Manager
Hazardous Waste Management Division (H-9-2)
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April 7, 1998

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

Dear Mr. Baer:

**DRAFT PRELIMINARY ASSESSMENT (PA) FOR 25 AREAS OF CONCERN
(AOC) LONG BEACH NAVAL SHIPYARD, LONG BEACH, CALIFORNIA**

The California Department of Toxic Substances Control (DTSC) has completed its review of the *Draft PA for 25 Group B Areas of Concern Long Beach Naval Shipyard, Long Beach, California*, dated February 25, 1998 and received by DTSC on February 27, 1998. The *Draft PA* was prepared by CDM Federal Programs Corporation for Southwest Division Naval Facilities Engineering Command.

The *Draft PA* presents the results for 25 Group B AOC at the Long Beach Naval Shipyard. Based on the information provided in the *Draft PA*, DTSC concurs with 17 of the 25 for no further action and with the 8 AOCs selected for further action. For clarity DTSC recommends that Figure 4.3-1 be color-coded. In addition, please include a sample copy of a weekly Satellite Accumulation Point inspection checklist as an appendix. Please incorporate the additional information as requested above in the final version of the PA.

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. If you have any questions, please contact me at (714) 484-5417.

Sincerely,

Alvaro Gutierrez
Base Closure Team Member
Region 4 Base Closure Unit
Office of Military Facilities

cc: See next page.

Ms. Kurt Baer
April 7, 1998
Page 2

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Base Environmental Coordinator
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Ms. Kurt Baer
April 7, 1998
Page 3

cc: Mr. Martin Hausladen
Remedial Project Manager
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Cal/EPA

Los Angeles
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March 24, 1998

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Pete
Wilson
Governor

**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

Mr. Kurt Baer
Page 2

cc: Alvaro Gutierrez, Department of Toxic Substances Control
Martin Hausladen, Environmental Protection Agency
Alan Lee, Southwest Division



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TO: Kurt Baer

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Telephone # 619-532-4743
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FROM: Karla Brasacemle

925-603-7917
Originator's Telephone # _____

TOTAL PAGES: 2 (incl. cover sheet)

DATE: 4/23/98

W.O. #: (76)

COMMENTS:

Please also give a copy to Martin, if you see him. I will fax
a copy to his hotel, but he won't get it until tonight.

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**COMMENTS ON THE WORK PLAN ADDENDUM
NO. 1 FOR GROUP B AREAS OF CONCERN
INVESTIGATION, PRELIMINARY ASSESSMENT/SITE INSPECTION
LONG BEACH NAVAL SHIPYARD**

1. Section 3, p. 8, last paragraph and Figure 8. The text states that one soil and one groundwater sample will be collected in the steam-cleaning area, but Figure 8 only shows a soil sample. The groundwater sample should also be collected. Please revise this figure.
2. It is unclear why sampling was not proposed for Drydock 1. If contamination is found in either the Drydock 2 or Drydock 3 sediment samples, it will be necessary to go back and sample Drydock 1 sediments. Please explain why Drydock 1 was not proposed for sampling and consider collecting a sediment sample from this drydock.
3. Table 3. The Drydock 2 (SWS4) and Drydock 3 (SWS5) samples should also be analyzed for organotins since these compounds could be released during sandblasting or painting in the drydock.

The acetylene generation and sludge pit (HIST5) sample should also be analyzed for metals.