



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

5090.3
Ser 05BL.DR/0448
November 5, 1998

Mr. Alvaro Gutierrez
California Environmental Protection Agency
Department of Toxic Substances Control
5796 Corporate Way
Cypress, CA 90630

Dear Mr. Gutierrez:

Enclosure (1) is the Navy's Response to Comments for the Agencies review of the Draft Sampling Report for Nine Group B Areas of Concern for the Long Beach Naval Shipyard, Long Beach, California. Request your review and concurrence be provided by November 20, 1998 to:

Commander
Attn: Duane Rollefson (Code 05BL.DR)
Southwest Division, Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

For questions or concerns regarding this matter, please contact Mr. Duane Rollefson at (619) 532-4712.

Sincerely,

A handwritten signature in black ink, appearing to read "Faiq Aljabi".

FAIQ ALJABI
Environmental Engineer
By direction of the Commander

Enclosure: (1) Navy Response to Comments on Agencies review of the Draft Sampling Report for Nine Group B Areas of Concern for the Long Beach Naval Shipyard of July 30, 1998

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Copy to:

Mr. Hugh Marley (Enclosure 1 only)
California Environmental Protection Agency
Regional Water Quality Control Board
101 Centre Plaza Drive
Monterey, CA 91754-2156

Mr. Martin Hausladen (Enclosure 1 only)
U. S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

Ms. Karla Brasaemle
Roy Weston Inc.
1 Concord Centre, Suite 1580
2300 Clayton Road
Concord, CA 94520-2148

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RESPONSE TO AGENCY COMMENTS

DRAFT SAMPLING REPORT FOR NINE GROUP B AREAS OF CONCERN (AOCs)

LONG BEACH NAVAL SHIPYARD, LONG BEACH, CA

Comments from United States Environmental Protection Agency (U.S. EPA) Region IX - dated August 25, 1998.

	U.S. EPA COMMENTS	NAVY/CDM FEDERAL RESPONSE
General Comments		
1.	The lengthy quotation in Section 1.3.3, Environmental Setting , is the weak part of this document. This section should be carefully edited if this quotation will be used in future documents. A few specific comments are provided.	Section 1.3.3 has been checked word-for-word against the EBS source document. Specific Comments 2 through 6 below have been incorporated. Section 1.3.3, paragraph 1: A third sentence has been added, stating "The 1997 Remedial Investigation (RI) Report contains additional details."
2.	The figures showing summaries of the sampling results with highlighted contaminants that are above the screening criteria are well done and most helpful.	Acknowledged.
Specific Comments		
1.	Section 1.3.2, p. 1-4, paragraph 1. Better wording of the sixth line would be: therefore, the entire LBNSY is constructed on man-made fill.	Section 1.3.2, paragraph 1, sentence 3. The phrase "therefore, man-made fill occupies the entire LBNSY facility" has been replaced with "therefore, the entire LBNSY is constructed on man-made fill."
2.	Section 1.3.3.1, p.1-4, paragraph 2. Please change "higher evaluations" to "higher elevations".	Section 1.3.3.1, paragraph 2, sentence 1. Changed "higher evaluations" to "higher elevations."
3.	Section 1.3.3.2, p 1-6, paragraph 4. Please clarify whether the last sentence refers to the upper two sand members or one of the other "three to four separate sand to gravely sand zones."	Section 1.3.3.2, paragraph 4. Deleted sentences 3, 4, and 5 and replaced them with the following sentence (not in italics): The "200-Foot Sand" or the Gage Aquifer typically occurs as the uppermost continuous sand deposit in the formation."
4.	Section 1.3.3.2, p. 1-6, paragraph 2. The second line should read "fault scarps" rather than "fault scraps".	Section 1.3.3.2, paragraph 7, sentence 1. Changed "fault scraps" to "fault scarps."

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5.	Section 1.3.3.2, p. 1-7, paragraph 1. If the water injection system is still active, please change “controlled further subsidence” to “controls further subsidence”.	Section 1.3.3.2, paragraph 10, sentence 5. Changed “controlled further subsidence” to “controls further subsidence.”
6.	Section 1.3.3.4, p.1-8, paragraph 4. Please state whether the poor quality of the Gaspar aquifer is due to contamination or salt water intrusion.	Section 1.3.3.4, paragraph 4, sentence 3. Changed sentence to “ <i>As a result, groundwater in the Gaspar Aquifer is no longer artesian, and its poor quality in this area (due to salt water intrusion) makes it unsuitable for irrigation and domestic use (BNI 1996).</i> ”
7.	Section 1.4, p. 1-12. Since the purpose of this investigation is to determine if these facilities are suitable for release for reuse by a third party, more attention should be given to evaluating hazards for the most likely future land use.	Section 1.4.1, <u>Soil Pathway, Conclusions</u>, paragraph 1, sentence 4. The fourth sentence has been replaced with “The highest potential for future impacts from soil would be to workers exposed to soil during excavation (SWDIV 1998). This exposure could occur from direct contact with soil that is excavated when foundations for new buildings are constructed, or exposure could occur from inhalation of contaminated soil particulates during excavation.”
8.	Section 1.4.2, p. 1-14, paragraph 4. It is unclear whether the second to last sentence should read “salt water <i>for</i> cooling of onboard ship activities.”	Section 1.4.2, paragraph 4, sentence 4. Changed sentence to “In addition to the freshwater supply, four pump stations located along the edge of LBNSY harbor provided salt water cooling for onboard ship activities, pier fire protection, and drydock activities.”
9.	Section 3.3.2, p. 3-5, paragraph 2. Please reference Figure 3-3 and state that the plume is being investigated under separate contract.	Section 3.3.2, paragraph 3. Added the following sentence at the end of the paragraph: “This groundwater plume, identified in Figure 3-3, is currently being investigated under a separate contract.”

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10.	Section 4.2, p. 4-3, paragraph 2. Please remove the parentheses around the second sentence.	Section 4.2, paragraph 2, sentence 2. The parentheses around the second sentence have been removed.
11.	Section 5.1.1, p. 5-3, paragraph 3. Please delete the second " April 1993".	Section 5.1.1, paragraph 6, sentence 4. Changed sentence to "Analysis of discharge from the drydock in April 1993 indicated that the NPDES copper limit was exceeded; copper slag used in sandblasting operations may have been the source."
12.	Figure 5-1, p. 5-5. The left side of this figure is very difficult to read.	Figure 5-1. Retyped words that were difficult to read (the original historical figure was of poor quality).
13.	Section 8.0, p. 8-1, paragraph 2. Please provide additional information found on pages 5 and 6 of the Work Plan Addendum No. 1 that the building was modified after 1980 for breakdown and storage of asbestos waste and that the building was cleaned and closed. Please include the regulations and/or procedures followed for this cleaning and closure.	Section 8.0, paragraph 2. Added the following as sentence 2: "After 1980, Building 98 was modified to accommodate the breakdown and storage of asbestos waste. Asbestos sampling was not required because the building was properly cleaned and closed (CDM 1998b and CDM 1998c). These procedures included cleaning the building with a vacuum system using high efficiency particulate air (HEPA) filtration, wet mopping, and wiping down areas with water."

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14.	Section 11.1, p. 11-2, paragraph 6. Please provide the basis for concluding that soil and groundwater were not impacted by the 100-gallon fuel oil tank spill.	Section 11.1, paragraph 8, sentence 6. No spill occurred; rather, the text referred to a 100-gallon fuel oil tank, not a 100-gallon spill. After reviewing this paragraph, sentences 5 to 7 have been deleted and replaced by the following corrected sentences: “Four underground gasoline tanks (Tanks 302, 303, 332, and 333) were removed in 1997. West of Building 7, a 1997 investigation verified that a 100-gallon fuel oil tank (Tank 301) no longer existed and had been removed at some time prior to 1997. Soil sampling in 1997 indicated that soil beneath the UST was not impacted (PRC Environmental Management, Incorporated 1997). A closure letter from the RWQCB was received on 20 July 1998.”
15.	Section 12.0, p. 12-1, paragraph 4 Please state the objectives and matrix being investigated in the area south of Building 128.	Section 12.0, paragraph 4, sentence 1. Reworded the first sentence to read “South of Building 128, possible breaks in the sanitary sewer line were investigated by sampling soil and groundwater beneath the lines. In this area, sample results for two of the three groundwater samples exceeded criteria.”

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	U.S. EPA COMMENTS	NAVY/CDM FEDERAL RESPONSE
16.	<p>Section 12.0, p. 12-2, paragraph 1. Since the only soil sample taken showed mercury below background and was seven feet above the water table additional soil sampling should be performed beneath the hole in the storm drain located east of Building 132. Soil samples should also be taken in conjunction with the additional groundwater samples. In addition to industrial sources of mercury, please clarify whether any records of mercury releases from failed pump seals or other equipment have been discovered.</p>	<p>Section 12.0, paragraph 1. Added the following sentences to the end of the <u>Groundwater</u> paragraph for the <u>Storm Water System Drain Lines</u>: “At each groundwater sample location, soil will also be sampled and analyzed for mercury at depths of 3.5 and 7 feet above the groundwater table (the storm drain line is located 9.5 feet above the water table at this location). No industrial sources of mercury have been identified in this area; pumps in the storm drain line are located 250 feet downgradient and pumps that contained mercury seals at Drydock 1 were in the hydrostatic pressure relief wells, not in drydock tunnels that discharge wastewater to the storm drain system.”</p>
17.	<p>Section 12.0, p.12-3, paragraph 1 and 2. The sediment in both drydocks should be removed. There is no assurance that the sealed tunnels would not be reopened. The fifth line of the first paragraph should refer to Drydock 2.</p>	<p>Section 12.0, <u>Drydock 2 Water Tunnels (SWS 4)</u>, sentence 4: The approved Port of Long Beach reuse plan indicates that there is no future planned use for Drydocks 2 or 3; therefore, if the tunnels are sealed, they would not be reopened.</p> <p>Changed sentence 4 to “It is recommended that accumulated sediment in the Drydock 2 drainage tunnel be removed if reuse of the drydock is planned.”</p>
18.	<p>Section 12.0, p. 12-3, paragraph 4. Please edit this paragraph to reflect that a single groundwater sample was collected at HIST 3.</p>	<p>Section 12.0, <u>Acetylene Generating Plant and Sludge Pit</u>, sentence 1: Changed sentence 1 to “Analytical results for one groundwater sample collected at HIST 3 indicated that no screening criteria were exceeded; therefore, no further action is recommended for this AOC.”</p>
19.	<p>Appendix I, p. I-3, paragraph 6. The first sentence should read “No data were rejected.”</p>	<p>Appendix I, paragraph 6, sentence 1. The first sentence has been edited to read “No data were rejected.”</p>

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Comments from California Environmental Protection Agency (Cal EPA), Department of Toxic Substances Control (DTSC) – dated 20 October 1998.

	DTSC COMMENTS	NAVY/CDM FEDERAL RESPONSE
1.	<p>Page 12-3, Gun Mount Storage, Cleaning Repair Yard (HIST 5), Paragraph 2: Beginning with “BEHP was detected..... samples”. This sentence states that one sample exceeded California Ocean Plan criteria for Bis (2-ethylhexyl) phthalate, a common laboratory contaminant. DTSC has concern regarding whether or not the laboratory is following the required protocols. Please explain in specific detail how this laboratory contamination occurred.</p>	<p>In the draft report, Appendix I, page 1-2, SVOCs, paragraph 2 addresses this issue in detail. In summary, as described in Appendix I, BEHP is recognized as a common laboratory contaminant (U.S. EPA 1994b), typically as a result of BEHP in plastic gloves (especially when they are contacted by solvents) that contact glassware. The reported concentration (0.004 J mg/L) in one sample is below the typical laboratory reporting limit of 0.010 mg/L and only slightly above the Ocean Plan criterion of 0.0035 mg/L.</p> <p>The independent third party data validator, Laboratory Data Consultants, did not identify any protocol violations regarding blank contamination.</p> <p>Page 12-3, Gun Mount Storage, Cleaning Repair Yard (HIST 5), Paragraph 2 has been revised to read as follows: BEHP was detected at a concentration (0.004 mg/L) that slightly exceeds its California Ocean Plan criterion (0.0035 mg/L) in one of the five groundwater samples. It was not a suspected site contaminant. Because the shallow groundwater beneath LBNSY is not potable and is not used for water supply purposes (Section 1.4), the potential human exposure pathways to groundwater contaminants are incomplete. In addition, the concentration detected was below the U.S. EPA Region IX tap water PRG (U.S. EPA 1998) and below the standard laboratory reporting limit of 0.010 mg/L. Finally, as discussed in Appendix I, BEHP is a suspected laboratory contaminant from plastic in laboratory gloves and its detection in the sample may not be representative of subsurface conditions at the sampling location. Therefore, the reported BEHP concentration does not appear to warrant a recommendation for further action.</p>

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	DTSC COMMENTS	NAVY/CDM FEDERAL RESPONSE
2.	<p>Page 12-3, Paragraph 5, Last Sentence: Please see the sentence starting with "The detected TPH.....below screening criteria. "This sentence refers to a screening criteria, yet it does not specify which criteria. Please specifically state which screening criteria is being referred to throughout this section and the report.</p>	<p>Section 12.0, Gun Mount Storage, Cleaning, and Repair Yard (HIST 5), paragraph 1, sentence 2. Changed sentence 2 to "The detected TPH concentrations were below Los Angeles RWQCB screening criteria." The source of the LA RWQCB screening criteria was listed in Section 2.2.6 ("Screening Criteria") and Table 10-4 footnote (h) for the Gun Mount Storage, Cleaning, and Repair Yard. The TPH screening criteria are from Table 4-1 of the Los Angeles RWQCB <i>Interim Site Assessment and Cleanup Guidebook</i>, dated May 1996. These criteria are 1,000 mg/kg for TPH-gasoline, 10,000 mg/kg for TPH-diesel, and 50,000 mg/kg for TPH-oil for soil above a non-drinking water aquifer.</p>

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LONG BEACH NAVAL SHIPYARD, LONG BEACH, CA

Comments from Los Angeles Regional Water Quality Control Board (RWQCB) – dated 7 August 1998.

	RWQCB COMMENTS	NAVY/CDM FEDERAL RESPONSE
1.	<p>TPH as gasoline, diesel, and motor oil were detected in sample SS1n. The concentrations detected are slightly below screening criteria. However, there is no known source for the contamination detected. Also, the next sample location, SS1g, is 750 feet away. Based on the above, we will require additional data in the vicinity of sample SS1n.</p>	<p>Additional sampling will be conducted in this area at the same time that Work Plan Addendum Number 2 (covering 10 AOCs) is implemented, likely in November 1998. Four sampling locations (one in each direction, approximately 20 feet away from SS1n) are proposed, with two soil samples (depths of approximately 5 and 10 feet below ground surface) and one groundwater sample (depth of approximately 15 feet bgs) collected at each of these four locations. Samples will be analyzed for TPH, VOCs (to assess benzene, toluene, ethylbenzene, and xylenes concentrations that may be associated with TPH), and SVOCs (to assess PAH concentrations that may be associated with TPH).</p>
2.	<p>Additional groundwater sampling, for mercury, is proposed in the vicinity of SW2b. Include soil sampling at the site in order to identify a soil source, if any.</p>	<p>Agreed. See response to Comment 16 from U.S. EPA.</p>
3.	<p>Contamination above screening criteria was noted in the storm drain catch basin sediments. Please address sediments remaining in the storm drain conduits. The Navy should consider including the pending excavation and demolition of the storm drains and catch basins in any remediation plan proposed for the site. Please note that the contaminated sediments in the AOC should be addressed prior to the next wet season.</p>	<p>Section 12.0, Storm Water System Drain Lines, Sediment, paragraph 3. Added the following sentence after sentence 2: “The Navy will consider cleaning out storm drain catch basin sediments if the Port of Long Beach does not plan to clean out sediments when redevelopment occurs.”</p>