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Installation Restoration Program - Draft Site Inspection

Port of Long Beach Preliminary Comments

July 29, 1992

The Port of Long Beach has relatively few comments on the site inspection study, which appears in general to have been carefully designed and conducted. We offer several specific comments for the study team to consider in the preparation of the final document, and some thoughts on the overall focus of the restoration program as a whole.

The selection of sites for the characterization of "background" chemical concentrations at the NC Long Beach is inadequately justified in the document. No doubt the sites were designated in the work plan according to prior knowledge of the area. Given the widespread contamination that exists on the Naval Station, however, the average reader needs more assurance that the "background" samples do not, in fact, represent contaminated conditions.

The draft document's treatment of groundwater in the study area is incomplete in two respects. First, the groundwater underlying the harbor area, inland beyond Anaheim Street, is not potable. The document implies this by referring in one place to saline intrusion and in others to the lack of "beneficial uses" of groundwater. However, explicit statements of non-potability are necessary in sections 3 and 6 to ensure that readers not familiar with the area do not infer a potential beneficial use where none exists.

Second, the report does not describe the Dominguez Gap Barrier water injection project and its dominating effect on groundwater movement at least as far down as the Gaspar zone. Any discussion of transport and fate of contaminants via groundwater must take this factor into account. In our view, the possibility that shallow groundwater contamination within the harbor area could affect drinking water supplies is extremely remote as long as the Dominguez Gap project is in operation. Thus, the mere mention of drinking water supplies in connection with near-surface contamination on the NC Long Beach, especially at Sites 1-4, may be inappropriate.

The tables of results presented in section 6 are difficult to use for the reader not trained in interpreting chemical analytical results. Specifically, the presence of numerous values modified by three similar annotations (U, J, B) makes it virtually impossible to determine the significance of the results. Most of the values, including many that appear large, are actually equivalent to "undetected" or "trace - unquantifiable". The correct presentation of analytical data is an admittedly difficult problem, but in the case of tables meant for broad review and decision-making, such as the ones in section 6, some simplification in the interests of clarity is advisable.

The summary table (Table 6-9) is flawed by the difficulty of determining what the "screening value" means and how it is used -- a large footnote on each page of the table would help.

Finally, we suggest that future phases of this investigation incorporate realistic appraisals of the potential risks posed by the observed levels and sites of contamination, and allocate resources accordingly. For example, devoting additional resources to more investigations of groundwater movements at the sites along the Navy Mole (1-4), as recommended by the document, does not appear justified because the only credible exposure pathways at those sites are through soil and surface waters. If it is necessary to confirm the groundwater gradient, it is likely that a one-site study will serve for all four sites. The document recommends more chemical sampling at Site 4 despite the apparently minimal contamination and its isolation from humans and sensitive environments. Is this really justified?

The investigations will be long and costly. Since resources will not be unlimited, it would be prudent to give the investigation a practical focus. The project manager and the Technical Review Committee should consider limiting needless investigations to the maximum extent that is prudent and permissible.