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NAVSTA LONG BEACH
SSIC #5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

April 5, 1994

Captain Barry Janov
Commander Long Beach Naval Shipyard
300 Shipjack Road
Long Beach, California

Captain John Jones
Commander Long Beach Naval Station
Long Beach Naval Station
Long Beach, California 90822-5000

Subject: Final Technical Memorandum, Investigation Derived Waste Management Plan, Health and Safety Plan, Data Management Plan, Fish Sampling Plan and Risk Assessment Work Plan for the Naval Station Long Beach

Dear Captains Janov and Jones:

The Environmental Protection Agency's (EPA's) has completed its review of the Final Technical Memoranda, Investigation Derived Waste Management Plan, Health and Safety Plan, Data Management Plan, Risk Assessment Work Plan and Fish Sampling Plan for the Naval Station Long Beach, dated January 30, 1994 for CTOs 015, 016 and 026. We have reviewed the subject documents along with Bechtel's response to comments table dated February 10, 1994.

EPA has no comments regarding the Final Technical Memoranda, Investigation Derived Waste Management Plan, Health and Safety Plan, or Data Management Plan. EPA is not in agreement with some of the NAVYs comment responses regarding the Risk Assessment Work Plan and Fish Sampling and Analysis Plan. It was outlined in the NAVYs responses that EPA's comments specific to water column sampling and the use of the fish tissue data as part of the ecological assessment were not incorporated into these documents as they required revision to the existing Clean I RI/FS Work Plan. However, both of these issues have been addressed as part of the technical memorandum submitted to the agencies on April 1, 1994 which modifies the scope of work presented in the Clean I RI/FS Work Plan.

REC'D OFFICE OF THE
COMMANDING OFFICER
NAVSTA LONG BEACH

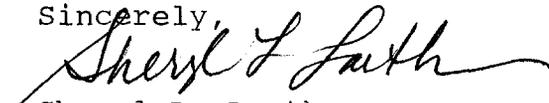
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Therefore, while EPA is not in agreement with some of the NAVYs responses to our comments with respect to CTO 26, we are encouraged by the NAVYs indication that the scope of work for CTO 26 is currently being revised to address agency concerns. We suggest that the NAVY provide EPA with an indication of how the changes to CTO 26 will effect the subject documents and propose a method for addressing the outstanding issues related to the ecological risk assessment. Based on the ambitious schedule for CTO 26, it may be more appropriate to address these comments as part of a technical memorandum rather than revising the final documents. We suggest discussing these issues at the April 13, 1994 meeting regarding CTO 26.

If you have any questions please contact me at (415) 744-2410.

Sincerely,



Sheryl L. Lauth
Remedial Project Manager

cc: Alvaro Gutierrez, DTSC
Alan Lee, Southwest Division
Denise Klimas, NOAA