

**Response to Regulatory Agency Comments on
 Long Beach Naval Complex
 Draft Final Site Management Plan**

Department of Toxic Substances Control (DTSC) Comments - 12 April 2001		Response
1.	<p>Section 6 - Schedule and Implementation Plan for Long Beach Naval Complex</p> <p>Please revise the first paragraph to reflect the language in Section 12.2 of the Federal Facility Site Remediation Agreement (FFSRA). This was agreed upon during the 19 October 2000 conference call between DTSC and SWDIV.</p> <p>Section 12.2 of the FFSRA: Near term milestones for performance of work and submittal of documents within the current fiscal year (FY) are enforceable. Near term milestones, out year milestones and project end dates will not change without the parties' agreement, unless in accordance with the procedures outlined in section 19 (Extensions). Out year milestones and project end dates shall not be enforceable until they become near term milestones for the current FY in accordance with the terms of section 13.4; provided, however, if an activity is fully funded in the current FY, milestones associated with performance of work and submittal of documents associated with such activity (even if they extend beyond the current FY) shall be enforceable. For the purposes of this Agreement, a fiscal year is the yearly time frame used by the United States Government that commences on October 1 and ends September 30th of the following calendar year.</p>	<p>The SMP has been revised to include the following text in the first paragraph of Section 6.0: "A general schedule for all future SMP activities at LBNC is provided in Figure 6-1. This Master Schedule is an estimated projection of activities and dates that are necessary to carry all the SMP sites through closeout. Near term milestones (i.e. submittals and activities to be completed within the current fiscal year) are enforceable (per the FFSRA, Section 12.2). For the purposes of this SMP, the current fiscal year (2001) ends September 30, 2001. Dates and activities in this schedule beyond the current fiscal year are not enforceable as site-specific circumstances may change and vary the schedule. Figure 6-2 provides a detailed Two-Year Schedule that shows all activities, durations, start dates and finish dates for the SMP sites that will occur in the next two years (ending September 30, 2003)."</p>
2.	<p>Section 6.1 - IR Sites 1 and 2</p> <p>It states that the Remedial Action was completed February 15, 2001. Installation of in-situ air sparging/soil vapor extraction (IAS/SVE) system is currently underway. Once installation of IAS/SVE is completed and shown to be operating as designed, then an Operation and Maintenance phase will begin until the remedial action objectives are achieved. Please omit long term monitoring and revise the language in this section to reflect the above.</p>	<p>Remedial Action at Sites 1 and 2 has not begun. The SMP has been revised to include the following text in Section 6.1: "The Record of Decision (ROD) was signed on June 9, 2000 and includes a program of groundwater remediation and debris removal. Remedial Action at IR Sites 1 and 2 is expected to begin in July 2001."</p>

**Response to Regulatory Agency Comments on
Long Beach Naval Complex
Draft Final Site Management Plan (continued)**

3.	Section 6.5 - IR Sites 8, 10, and 11	The schedule of completion for the Feasibility Study of April 2001 does not seem to be realistic. The Navy has not responded to the second set of regulatory agencies comments. Please revise the date to reflect a more realistic date.	The SMP has been revised to include the following text in Section 6.5: "The FS is underway and will be finalized by July 2001."
4.	Figure 6-1 - Master Schedule; IR Sites 1 and 2	Please revise Remedial Action and Long Term Monitoring dates to reflect what was mentioned in the comment above (pertaining to Section 6.1).	The SMP has been revised to include the following dates in Figure 6-1 for IR Sites 1 and 2: "Remedial Action Start date: 02 July 2001 Remedial Action Finish date: 01 July 2002 Long Term Monitoring Start date: 02 July 2002 Long Term Monitoring Finish date: 13 October 2004"
5.	Figure 6-1 - Master Schedule; IR Site 14	Please change Construction and Construction Report Tasks to: Removal Action and Groundwater Monitoring.	The SMP has been revised to include the following dates in Figures 6-1 and 6-2 for IR Site 14: Removal Action, Removal Action Report, Groundwater Monitoring, and Site Closeout Summary.
Department of Toxic Substances Control (DTSC) Comments - 07 June 2001			Response
6.	Figure 6-2 - Detailed Schedule IR Sites 1 and 2	Remedial Action (RA) at IR Sites 1 and 2 has already begun in October 2000 with the first phase of drum/container removal and contaminated soil excavation. Please change the start and final dates for RA to reflect that fact. When the second phase of RA which includes setup and testing of IAS/SVE system is completed and the system proved to be working as per the approved remedial design, then the end of this phase will be the start of the LTM.	The SMP has been revised to include the following subtasks in Figure 6-2 for IR Sites 1 and 2 - Remedial Action: "Drum/Container and Soil Removal: 10/2/00 - 1/30/01. Install IAS/SVE System: 7/16/01 - 8/15/01."
California Regional Water Quality Control Board (RWQCB) Comments - 09 May 2001			Response
7.	General	The text and tables in the draft final document provide some schedules and deadlines that have already expired. Please revise these schedules and deadlines with more realistic dates.	The SMP has been revised to include schedules and deadlines that provide more realistic dates.

**Response to Regulatory Agency Comments on
Long Beach Naval Complex
Draft Final Site Management Plan (continued)**

8.	Appendix A - Sites with No Further Action Required/Pending	Page A.19, under the current status column for AOC Site MISC 7, it states that no further action is pending regulatory agency approval. This status is incorrect. As indicated in Section 4.3.1, Gasoline Station (Building 101), page 4-5, a draft human health risk assessment is currently under regulatory review. A determination on the future actions at this site will be made based on the results of this review. Please revise Appendix A to reflect the correct status for AOC Site MISC 7, accordingly.	The SMP has been revised to include the following text in the Current Status column of Appendix A for AOC Site MISC 7: "The PA for the 171 Group B AOCs completed in April 2000. This AOC is addressed under the compliance program as the Building 101 Gasoline Station and will be tracked under the compliance program."
----	---	--	--

Certified Unified Program Agency (CUPA) No Further Action Approval Letter - 17 April 2001

	SITE NAME	CURRENT STATUS
9.	AOC Site IWS 3	The PA for the 171 Group B AOCs completed in April 2000. No further action required. Approved 4/17/01 by CUPA.
10.	AOC Site IWS 4	The PA for the 171 Group B AOCs completed in April 2000. No further action required. Approved 4/17/01 by CUPA.
11.	AOC Site IWS 5	The PA for the 171 Group B AOCs completed in April 2000. No further action required. Approved 4/17/01 by CUPA.
12.	AOC Site IWS 6	The PA for the 171 Group B AOCs completed in April 2000. No further action required. Approved 4/17/01 by CUPA.
13.	AOC Site IWS 7	The PA for the 171 Group B AOCs completed in April 2000. No further action required. Approved 4/17/01 by CUPA.
14.	AOC Site ADD 1	The PA for the 171 Group B AOCs completed in April 2000. No further action required. Approved 4/17/01 by CUPA.