



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

N68311.000523
NAVSTA LONG BEACH
SSIC #5090.3

March 24, 1994

Mr. Alan Lee
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5181

Subject: Final Removal Site Evaluation (RSE) for Site 6A, Long Beach Naval Station

Dear Mr. Lee:

Enclosed please find the Environmental Protection Agency's (EPA's) Comments regarding the subject document. If you have any questions please call me at (415) 744-2410.

Sincerely,

A handwritten signature in cursive script that reads "Sheryl Lauth".

Sheryl Lauth
Remedial Project Manager

Attachment

cc: Alvaro Gutierrez, Cal-EPA

EPA's Comments Regarding the Final RSE for Site 6A
Long Beach Naval Station

1. It is unclear from the introduction as to how the data collected as part of the RSE investigation will be incorporated into the RI/FS Report. We agree that sufficient soil samples have been collected and evaluated as part of the RSE; however, these data, inconjunction with the groundwater data to be collected during the RI/FS investigation, must be included in the RI/FS Report.
2. Page 7-21: The formula for the carcinogenic risk analysis is incorrect and must be corrected. It is not possible to evaluate the information provided for the "hot spot" evaluation based on the equation provided.
3. The potential health hazards associated with the higher risk locations for noncarcinogens must be included.
4. Figure 6-9 identifies TPH concentrations above 1000 mg/kg this is inconsistent with the text, page 6-18.
5. Section 8 Evaluation of Remedial Alternatives. In accordance with the NCP 300.410 (a) "A removal site evaluation (RSE) includes a removal preliminary assessment and if warranted a removal site inspection." We realize that the RSE was conducted, as agreed by all the parties involved at the time of scoping, as it appeared to be the most appropriate method to support the Port of LA proposed construction project at Site 6A. However, the RSE was conducted as part of a removal evaluation process, not the remedial process. The data gathered during the RSE help determine the need for response if any and the urgency of the response¹. Therefore, the RSE should only provide conclusions of the risk assessment to determine if a removal action is required. Evaluation of remedial alternatives is not appropriate for inclusion in the RSE document. Analysis of remedial alternatives must be conducted as part of the Feasibility Study (FS) in accordance with EPA guidance documents.

We do however realize that evaluation of remedial alternatives was included to support the Port of LA construction project rather than remedial or removal action. As such, should the NAVY chose to include the remedial alternatives section and recommendations regarding the construction scenario, we suggest that the NAVY provide clarification language stating that the alternatives are provided to support the construction activities and that the remedial alternatives for remedy selection will be analyzed using the nine evaluation criteria developed to address the CERCLA requirements as part of the FS².

We agree with the conclusion the risk posed by the surface soil is within the acceptable risk range and therefore no removal action is required. In addition, we agree with the conclusion that the risk to the construction worker can be limited through institutional controls. The conclusions regarding the risk to construction workers must be included in the documentation prepared for the lease agreement.

¹ Guidance on Conducting Non-Time-Critical Removal Actions under CERCLA, EPA/540-R-93-057, August 1993.

² Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, EPA/540/G-89 004, October 1988.