



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, Ca. 94105

December 8, 1990

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N68311.000562  
NAVSTA LONG BEACH  
SSIC #5090.3

Southwest Division  
Naval Facilities Engineering Command  
Environmental Division (Code 1812.WT)  
1220 Pacific Highway  
San Diego, CA 92132-5190  
Attn: Mr. William Thornton

Dear Bill:

I have reviewed the Final Draft Site Inspection Work Plans for the Naval Station Long Beach, CA and for the Naval Shipyard Long Beach, CA and would like to offer the following comments.

1. In our earlier communication to you, we requested that you provide (a) sampling data to confirm the presence of a release of hazardous substances to surface water and (b) sampling data to determine if hazardous substances have migrated to groundwater. This workplan attempts to meet this field sampling request.

2. We additionally requested that you provide information on (a) the number of military and civilian personnel employed at the base; (b) the accessibility of the waste disposal sites, specifically whether the sites are fenced or covered; and (c) the dimensions and containment features of all waste disposal sites. This information is missing and can easily be incorporated in Sections 1, General History and Description of the Naval Complex Long Beach, and/or 4, Site Description and History. This inclusion will make the report more complete for hazard ranking purposes by EPA.

3. The workplan does not explicitly define the data quality objectives for this sampling event. For example, what will the data be used for and who are the data users. Will the generated data be of the quality that it can be used for initial remedial investigation planning?

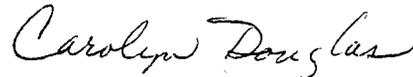
4. What is the rationale for generating CLP quality data when your intended purpose appears at this time to only be "to verify that the nature of hazardous substances contamination identified by the IAS exists....". A cost savings should exist if you do not use CLP. However, if you choose not to use CLP, you are required to submit the full data validation package along with an explanation of the data qualifiers.

5. Figure 7-1 -- Sampling Locations (both documents) -- While the sampling locations have been tentatively identified, it would be more helpful to the data users if the maps distinguished the soil, groundwater, and sediment sample locations better. In other words, triangles for soil, circles for groundwater, etc. as a suggestion. A legend of explanation should be incorporated on the map.

6. I encourage you to compare what you are planning to do at this site with the Federal Facility Review for the Naval Complex to ensure that our common objective is met. The new Hazard Ranking Model is finalized and should be available for use by the public shortly. It's at the printers.

If additional information or clarification is required, please feel free to contact me at (415) 744-2343.

Sincerely,



Carolyn Douglas, E.S.  
Federal Facilities PA/SI  
Coordinator

cc: Commanding Officer  
Naval Facilities Engineering Command