

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Room 4
West Broadway, Suite 425
Long Beach, CA 90802-4444
(310) 590-4868

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June 12, 1996

Mr. Kurt Baer
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway, Room 18
San Diego, California 92132-5181

Dear Mr. Baer:

DRAFT ACTION MEMORANDUM FOR SITE 3, AREA OF CONCERN (AOC) 4, NAVAL STATION LONG BEACH, LONG BEACH, CALIFORNIA

The California Department of Toxic Substances Control (DTSC) has completed its review of the *Draft Action Memorandum for Installation Restoration Program (IRP) Site 3, Area of Concern (AOC) 4, Naval Station Long Beach, Long Beach, California*, dated May 9, 1996. The *Draft Action Memorandum* was prepared by Southwest Division Naval Facilities Engineering Command.

The *Draft Action Memorandum* documents the Navy's decisions to conduct a Non-Time Critical Removal Action at Site 3, AOC 4. DTSC concurs with the Navy's action which addresses protection of human health and the environment in removing the arsenic contaminated soil from IR Site 3, AOC 4. The *Draft Action Memorandum* needs to be revised because formatting (page numbers) and typographical errors were noted during our review. In the final version of the Action Memorandum, include a table of contents. The Regional Quality Control Board - Los Angeles does not have any comments on this document.

DTSC comments are included within this letter. If you have any questions, please contact me at (310) 590-5565.

Sincerely,

A handwritten signature in cursive script that reads "Alvaro Gutierrez".

Alvaro Gutierrez
Base Closure Team Member
Region 4 Base Closure Unit
Office of Military Facilities

cc: See next page.



Mr. Kurt Baer
June 12, 1996
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cc: Mr. Albert Arellano Jr., P.E. (R4-4)
Unit Chief
Base Closure Unit
Office of Military Facilities
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, California 90802-4444

Ms. Sharon Lemieux (R4-4)
Environmental Assessment and Reuse Specialist
Office of Military Facilities
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, California 90802-4444

Ms. Jennifer Rich (R4-4)
Public Participation Specialist
Region 4 Base Closure Unit
Office of Military Facilities
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, California 90802-4444

Mr. J. E. Ross
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Mr. Alan Lee
Base Environmental Coordinator
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5181

Mr. Martin Hausladen
Remedial Project Manager
Hazardous Waste Management Division (H-9-2)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Specific Comments

1. **Section II, Part A:** Please delete the paragraph with "Note: This section is intended to address RAW requirements, as defined in 25323.1, Ca-HSC, specifically meeting the description of on-site contamination." and use it as a reference throughout the entire document.
2. **Section III, Part C, Subsection 1, Paragraph 2:** Please include Federal Environmental Protection Agency (EPA) in this paragraph as EPA has provided technical advice and oversight on the CERCLA process at Long Beach Naval Station since LBNS was slated for closure.
3. **Section V, Part A, Subsection 1, Paragraph 3:** Include in this paragraph, that confirmation samples will be collected before backfilling with clean soil and grading of the site is to occur.
4. **Section V, Part A, Subsection 6:** This paragraph indicates that the excavation will take less than two weeks and that the final report issued five months later. DTSC has concerns regarding the submittal of the report because the Navy is planning to transfer the Mole to Port of Long Beach in the near future. DTSC recommends the Navy to look into this matter so this cannot be an obstacle to transfer this property to Port of Long Beach.