

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
West Broadway, Suite 425
Long Beach, CA 90802-4444
(310) 590-4856



June 20, 1995

Mr. Donald W. Rice
Director of Environmental Management
Port of Los Angeles
425 S. Palos Verdes Street
San Pedro, California 90733-0151

Dear Mr. Rice:

WASTE MANAGEMENT PLAN (WMP) AND SITE-SPECIFIC HEALTH AND SAFETY PLAN (SSHSP) LONG BEACH NAVAL STATION, SITE 6A - SEASIDE AVENUE GRADE SEPARATION PROJECT, TERMINAL ISLAND, CALIFORNIA

The California Department of Toxic Substances Control (DTSC) has completed its review of the *Waste Management Plan and Site Specific Health and Safety Plan (WMP & SSHSP)*, dated May 25, 1995, for Long Beach Naval Station, Site 6A - Seaside Avenue Grade Separation Project, Terminal Island, California. The *WMP & SSHSP Plan* for this project was prepared for the Port of Los Angeles (POLA) by Tetra Tech, Inc.

DTSC and the Los Angeles Regional Water Quality Control Board comments submitted on the *Draft WMP & SSHSP* to POLA, dated March 1995, have been adequately addressed and incorporated in the *Final WMP & SSHSP*. DTSC understands that POLA is aware that Total Threshold Limit Concentration (TTLC) and Soluble Threshold Limit Concentration (STLC) are used to determine if the waste meets the hazardous waste criteria and whether it becomes a RCRA waste as presented on Figure 17 of the document. Furthermore, if the concentration of the extraction test is less than the STLC limit, then the waste does not meet the hazardous waste criteria but still could pose a threat to public health and the environment. Therefore, DTSC recommends to POLA, when determining the appropriate disposal methods proposed in the WMP, that POLA must ensure that handling of the waste complies with Applicable or Relevant and Appropriate Requirements (ARAR). Specifically, chemical-specific ARARs, which are usually health or risk-based numerical values or methodologies applied to site specific conditions, to ensure that non-hazardous waste will not pose a threat to public health and the environment.

DTSC will not request POLA to amend or revise the *Final WMP* but POLA must comply with the chemical-specific ARARs during the generation of waste for the planned construction activities at Site 6A. As a result, DTSC hereby concurs with the *Final WMP & SSHSP*, dated May 22, 1995, submitted by POLA for Site 6A construction of the Seaside Avenue Grade Separation project at Long Beach Naval Station.



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If you have any questions regarding this letter, please contact me at (310) 590-5565.

Sincerely,



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Office of Military Facilities
Southern California Operations

cc: Mr. Albert Arellano, Jr., P.E.
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