



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION IX
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 NAVSTA LONG BEACH
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OPTIONAL FORM 99 (7-80)

FAX TRANSMITTAL

To <i>Duane</i>	From <i>Martin</i>	# of pages ▶ <i>4</i>
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February 3, 1997

Mr. Duane Rollefson
 Remedial Project Manager
 Department of the Navy
 Southwest Division
 1220 Pacific Highway
 San Diego, CA. 02132-5190

Dear Mr. Rollefson:

**JOINT EPA/WESTON COMMENTS ON DRAFT SITE INSPECTION REPORT FOR
 AREA OF POTENTIAL CONCERN 5 AT THE NAVAL STATION LONG BEACH, CA.**

Enclosed are the the joint EPA/Weston comments on the above referenced document. We greatly appreciate the opportunity to review the document and look forward to moving ahead on this project.

If you have questions regarding these comments, please feel free to contact me at (415) 744-2388.

Sincerely,

Martin M. Hausladen
 RPM

**COMMENTS ON DRAFT
SITE INSPECTION REPORT FOR
AREA OF POTENTIAL CONCERN 5 AT THE
NAVAL STATION LONG BEACH**

GENERAL COMMENTS

1. This document does not include all of the elements that should be included in an SI Report, according to Exhibit 6-1 of the Guidance for Performing Site Inspections Under CERCLA. For example, the local geologic and hydrogeologic setting, groundwater use within a 4 mile radius of the site, should be included. This information has been compiled for the Remedial Investigation reports, so it should be fairly easy to incorporate in this document.

SPECIFIC COMMENTS

1. **Executive Summary, p. 1, paragraph 2, last sentence.** This sentence states that "the purpose of the SI was to ... and define the nature and extent of the PCE and other VOCs in the soil..."; this contradicts the statement on page 1-2 that "the scope of this SI report does not include delineation of the extent of contamination." Please explain or resolve this discrepancy.
2. **Section 3.3.3, p. 3-4.** Please confirm whether samples from monitor well borings for lithologic logging were collected in brass liners. If samples for lithologic logging were collected in brass liners, discuss how these samples were extruded to preserve lithologic information like layering.
3. **Figures 4-3 through 4-9.** It would have been more useful to have presented the analytical data in the order in which chlorinated solvents are dehalogenated or degraded (e.g., PCE/TCE/1,2-DCE/1,1-DCE/VC) rather than in alphabetical order. A dehalogenation order presentation is easier to remember and easier to understand than an alphabetic presentation and also helps a technical reader to more easily comprehend whether PCE is degrading at each location. Please consider this for future reports.
4. **Figure 4-7.** Boring log SB-05-14 does not indicate clay in the last 2 feet of the boring, yet this figure shows that there is clay in this interval. If the boring log is correct, but the figure is not, the contact between sand and clay in the vicinity of this boring would be flat. Please reconcile this discrepancy.

Also, please explain why the bottom of the upper sandy unit of boring HP-05-20 is correlated with a unit 6 to 8 feet bgs in the adjacent borings. HP-05-20 was only projected 2 feet onto the line of section, so the elevation change of a lithologic contact would not normally be expected to be this drastic.

5. **Section 4.2.1.** Please discuss the location of this site in respect to the former outline of Rattlesnake Island; layers in the vicinity of this former shoreline would likely dip to the south. Discuss whether this was considered when the cross-sections were constructed.

According to Section 4.2.3, at least part of the surficial coarser-grained unit is composed of fill. Discuss the extent of fill in Section 4.2.1, and describe how fill was differentiated from native sediments.

6. **Section 4.3.3.** The concentrations of chlorinated solvents and related degradation compounds in groundwater samples collected from HP-05-08 and HP-05-09 are also elevated. Therefore, the extent of contamination north of the facility, not just north of monitor well MW-05-02, has not been determined.
7. **Figures 4-21 and 4-22.** Please explain why the data from the mobile lab was contoured separately from the groundwater data from the fixed laboratory. Discuss whether the mobile lab data is considered as reliable as the data from the fixed laboratory. If both data sets are considered equally reliable, discuss whether the maximum value from each sampling point could have been used to create a single isoconcentration map.
8. **Section 4.3.3, p. 4-13, paragraph 2.** Note that Vinyl Chloride was detected only in groundwater samples collected from wells at the perimeter of the plume. It is likely that vinyl chloride "competes" for dissolution with PCE in the center of the plume.
9. **Table 4-8.** Please check the units in this table. PRGs are normally given in mg/kg not $\mu\text{g}/\text{kg}$.
10. **Section 5, p. 5-1.** A demolition worker is an inappropriate receptor of choice for a screening level risk assessment. Evaluation of this receptor does not protect for potential future uses of the property. Demolition of the building will not remove the soil or groundwater contamination present on the property, and will in effect make this contaminated media more readily available for people accessing the site after demolition. The purpose of a screening level risk assessment is to identify any potential risk to current or future receptors through making very conservative assumptions about site use. This has not been done.

The screening level risk assessment should be repeated using default exposure assumptions for a resident. If rationale such as zoning or deed restrictions can be cited, default industrial parameters can be used for the screening risk assessment. Use of maximum soil concentrations is not sufficient to qualify this risk assessment as "screening". It is routine practice in all risk assessments (screening and baseline) to use maximum media concentrations when small sample size precludes calculation of a reliable 95% UCL concentration.

11. **Section 5.** This screening risk assessment is incomplete without quantitative evaluation of groundwater pathways. Groundwater pathways for a resident must be considered. If residential use can be ruled out, industrial worker exposure to groundwater must be evaluated.

12. **Section 6.3.1.** Please discuss whether there are any schools or day care facilities within 200 feet of the site and whether there are any residences within a 1-mile radius (including the number of residents, if any).
13. **Section 7.2, p. 7-2, paragraph 3, sentence 7.** The statement "the extent of PCE in shallow soil above the Industrial PRG has been assessed" conflicts with the statement in the first paragraph on p. 4-7 that states that "the extent of shallow soil with PCE above 1,000 $\mu\text{g}/\text{kg}$ has not been fully assessed..." Also, note that there may be higher concentrations in the vicinity of MW-05-02, but it does not appear that soil samples were collected in this area. Please resolve.

Appendix G

1. Data validation was complete and was performed according to procedures described in the EPA guidance documents, National Guidelines for Inorganic and Organic Data Review. Only one deficiency was noted. Sample results were not validated for field blank contamination. Many common laboratory contaminants and other contaminants were detected in the field blanks: acetone; methylene chloride; chloromethane; carbon disulfide; toluene; 1,2-dichloroethene (total); tetrachloroethene; chloroform; 1,4-dichlorobenzene; xylene (total); styrene; 1,3-dichlorobenzene; 1,2-dichlorobenzene; bromodichloromethane; dibromochloromethane; and bromoform. Sample results should be qualified based on field blank results.
2. Validators noted that the laboratory did not perform the required percentage of matrix spike/matrix spike duplicates and/or laboratory control sample (LCS) QC analyses. The validators qualified sample results, where appropriate, when MS/MSD and LCS analyses were not performed.