



**DEPARTMENT OF THE NAVY**  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132-5190

N68311.000977  
NAVSTA LONG BEACH  
SSIC NO. 5090.3

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Ser 56LB.KO/0934  
October 8, 1997

**CERTIFIED MAIL RETURN RECEIPT REQUESTED**

Mr. Alvaro Gutierrez  
Project Manager  
State of California Environmental Protection Agency  
Department of Toxic Substance Control, Region 4  
Site Mitigation Branch  
245 Broadway, Suite 350  
Long Beach, CA 90802

Re: Identification of State "Applicable" or "Relevant and Appropriate" Requirements (ARARs) For The Feasibility Study (FS) at the former Long Beach Naval Station

Dear Mr. Gutierrez:

Pursuant to our previous discussions and consistent with §V.A.2.c of the August 1, 1990 Memorandum of Understanding between the Department of Health Services, the State Water Resources Control Board, and the Regional Water Quality Control Boards For the Cleanup of Hazardous Waste Sites, we are hereby requesting that the Department of Toxic Substances Control, as the lead agency for the State of California, identify potential State chemical-specific and location-specific ARARs for Installation Restoration (IR), Sites 1, 2, 3, 4, 5, and 6A.

In our Remedial Investigation (RI), report of July 1996 and Appendix U of the RI dated April 1997, we transmitted to you site characterization data for IR Sites 1, 2, 3, 4, 5 and 6A. In addition, we discussed this data at numerous Project Managers' meetings. The site characterization data should allow you to begin to identify, with some specificity, State chemical-specific and location -specific ARARs. Please note that a similar request for action-specific ARARs will be transmitted after remedial alternatives have been screened and developed for the Detailed Analysis of Alternatives phase of the FS.

In addition, the Department of the Navy is requesting that the State of California identify any other criteria, advisories, guidance, and proposed standards that the State requests to be considered (TBCs), for the above-identified IR Sites, which have entered the RI/FS phase.

Timely identification of potential State ARARs is required under Section 121(d),(2),(A) of CERCLA and under the National Contingency Plan (NCP), 40 CFR §§300.400(g) and 300.515(d) and (h). Experience to date around the country has shown that a failure to identify ARARs with sufficient precision early in the RI/FS process, can cause severe disruptions in timely implementation of remedial action. To ensure timely and complete ARARs identification for each IR Site listed above, please include the following information:

1. A specific citation to the statutory or regulatory provision(s) for the potential State ARAR and the date of enactment or promulgation.
2. A brief description of why the potential State ARAR is applicable or relevant and appropriate to the particular OU or IR Site.
3. A description of how the potential State ARAR would apply to potential remedial action, including: specific numeric discharge, effluent, or emission limitations; hazardous substance/constituent action or cleanup levels; etc., if the State intends to take the position that the potential State ARAR includes such limitations, levels, etc.
4. If the State believes its proposed ARAR is more stringent than the corresponding Federal ARAR, please provide the rationale and technical justification for this position.
5. If the State determines that there is not enough information to fully respond to our request, please identify any additional information that would be required to support identification of State ARARs and their application.

Consistent with 40 CFR §300.515(h)(2), we are requesting that you send a response via first class mail addressed to me and postmarked within 30 calendar days of receipt of this request.

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Please direct any technical questions that you may have concerning this request to the undersigned at (619) 532-2004, extension 15 and any legal questions to Mr. Armando Alvarez, Associate Counsel (Environmental), SOUTHWESTNAVFACENGCOM at (619) 532-3262.

Sincerely,



KIMBERLY A. OSTROWSKI  
Remedial Project Manager  
By direction of the Commander

Copy to:  
Mr. Martin Hausladen  
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Region 9  
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San Francisco, CA 94105

Mr. Hugh Marley  
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Regional Water Quality Control Board  
101 Centre Plaza Drive  
Monterey, CA 91754-2156

Mr. Philip Jagucki  
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505 King Street  
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