

**COMMENTS ON THE DRAFT ADDENDUM TO  
FINAL GROUNDWATER INVESTIGATION WORK PLAN  
(SUPPLEMENT TO THE RI FOR LONG BEACH NAVAL SHIPYARD)  
FOR IRP SITES 9, 12, AND 13 AT THE  
LONG BEACH NAVAL SHIPYARD**

1. **Section 2.1.3, p. 2-11, last paragraph.** The northern chlorinated plume is not shown on Figure 2-8 as indicated in the text; it appears that the reference should have been to Figure 2-7.
2. **Section 2.1.3 and Figures 2-8 and 2-9.** The proposed locations would be easier to review if the locations or at least the locations of the previous maximum hits were posted on these figures. When Figure 2-6 was enlarged to the same scale as Figure 2-9, proposed soil boring SB-S1-5 was found to be in the same location as former location HP-SGI-35. It is unclear whether this was intentional, but it may be difficult to overdrill the same location and it might be logical if SB-S1-5 and SB-S1-3 were located equidistant from previous location HP-SGI-35. Please explain how the proposed locations were selected and provide the former locations on Figures 2-8 and 2-9.
3. **Section 2.1.3, p. 2-25.** Potential source areas for AOPCs N-1 through AOPC N-5 are discussed in this section, but potential source areas or reasons for investigating AOPCs N-6, N-7, and N-8 are not discussed. Please discuss the reasons for selecting AOPCs N-6, N-7, and N-8 in this section.
4. **Section 2.1.3, p. 2-25, paragraphs 1 and 4.** The first paragraph states that the remnants of the unknown small structure are located west of Building 217, but the last paragraph places these remnants east of Building 217. Please be consistent and specify the correct location of this former structure in these paragraphs.
5. **Sections 2.1.5 and 2.1.7.** This sampling plan does not take into consideration the possibility that the source area(s) are below the water table rather than in the vadose zone. Groundwater samples should be collected to account for this possibility. Collecting these samples at this time will minimize future expense because these samples would not have to be collected after another mobilization. Groundwater sampling would also allow better definition of the groundwater plume.
6. This work plan should include a table listing analytes, sample container size and type and preservation requirements for both soil and aqueous (blank) samples.

**APPENDIX A**

1. **Section A.5.1.2.1, Volatile Organic Compounds.** Indicate how many or what percentage of samples will be submitted for confirmatory laboratory analysis. Describe criteria to be used for selection of confirmation samples.

2. **Table A5-7, Data Quality Standards – Method 8021.** The table implies that matrix spike, MSD, and laboratory control sample analysis will be performed for all analytes; is this correct? Please indicate MS/MSD and LCS frequency,
3. **Table A5-7, Data Quality Standards – Method 8021.** Add the compound cis-1,2-dichloroethene to the list of target analytes since it is the primary degradation product of trichloroethene.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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January 8, 1998

Ms. Kim Ostrowski  
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**COMMENTS ON DRAFT ADDENDUM TO FINAL GROUNDWATER INVESTIGATION  
WORK PLAN (SUPPLEMENT TO THE RI) FOR INSTALLATION RESTORATION  
PROGRAM SITES 9, 12, AND 13 AT THE FORMER NAVAL STATION, LONG  
BEACH CALIFORNIA**

Dear Ms. Ostrowski:

The United States Environmental Protection Agency (USEPA) has received and reviewed the above referenced document. Enclosed are the combined EPA/ Weston comments on the document. We wish to thank the Navy and their contractor, Bechtel National, for the opportunity to review the document and look forward to resolving our issues and moving forward to complete the Groundwater Investigation.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Martin M. Hausladen".

Martin M. Hausladen  
RPM