



Cal/EPA

**Los Angeles
Regional Water
Quality Control
Board**

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**Commander
Southwest Division, Naval Facilities Engineering Command
Code 56LB.JH (John Hill)
1220 Pacific Highway
San Diego, CA 92132-5190**

DRAFT EXPANDED SITE INSPECTION REPORT FOR IR SITE 14, NAVAL STATION LONG BEACH, LONG BEACH CALIFORNIA (FILE No. 90-76)

We have received and reviewed the Draft Expanded Site Inspection Report for IR Site 14, dated January 1998. Our comments are as follows:

- The report indicates that separate groundwater zones with distinct characteristics are present below this site. Include potentiometric maps showing the flow direction for each groundwater zone identified in the report.
- Section 7.2 indicates that the groundwater below 40 feet acts as a vertical groundwater barrier with upward migration likely. However, concentrations of dissolved VOCs (PCE) increase significantly in the 40 to 50 foot zone. Indicate whether the pore pressure is sufficient to prevent the downward migration of NAPL.
- It is unclear whether the pressurized zone identified under the VOC site is localized or facility-wide. Please correlate the site hydrology with that of the Naval Complex as a whole. Include data from the ongoing deep benzene investigation.
- The screening criteria selected for the shallow groundwater is appropriate. Note however, that determining the appropriate screening criteria for the deeper groundwater zones requires an understanding of the flow direction, and, subsequently, the identification of its beneficial uses. Please include a discussion and pertinent data in the report.
- The axes of the contaminant plumes in the deeper zone appear to be skewed to the southeast. Discuss the likelihood of the lower zone being influenced by the Naval Shipyard drydock dewatering operations, as with the existing deep

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NAVSTA LONG BEACH
SSIC #5090.3

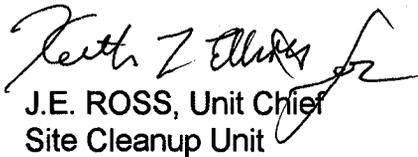


Pete Wilson
Governor

benzene plume. Should the above occur, we will require plume delineation in the southeast (downgradient) direction.

- Section 5.2 states that the fate and transport model assumes that all NAPI or source areas will be removed. This assumption may not be appropriate till the remedial method is selected and the results confirmed. Also, the assumption does not include NAPL present below the vadose zone. Note that modelling results require confirmatory monitoring well data. Indicate whether the model assumes that the groundwater flow direction in all zones are the same.
- The document reports only concentrations of PCE and its transformation products that were detected. Identify whether any VOCs other than that reported were detected and reported by the laboratory. This data may be beneficial to concurrent investigations.

If you have any questions regarding the above, please contact Hugh Marley at (213) 266-7669.


J.E. ROSS, Unit Chief
Site Cleanup Unit

cc:

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Martin Hausladen, Environmental Protection Agency
Alan Lee, Southwest Division

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