



March 12, 1998

Cal/EPA

Department of
Toxic Substances
Control

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Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

Dear Mr. Hill:

**COMMENTS ON DRAFT EXPANDED SITE INSPECTION REPORT FOR IR
SITE 14, NAVAL STATION, LONG BEACH**

The Department of Toxic Substances Control (DTSC) would like to thank you for the extension on the review period of the draft Expanded Site Inspection report for Installation Restoration Program Site 14. Based on our review, we offer the following comments.

1. Section 4.2.1, Site Hydrostratigraphic Setting:

Figures 4-3 and 4-4 show the geologic cross sections at this site; however, no boring logs were provided for any of the hydropunch samples to confirm the proposed hydrogeology. Boring logs from the hydropunches would be useful for hydrogeologic evaluation at this site because the Cone Penetration Test predictions and the visually-logged soil lithology from soil borings in appendix G showed little correlation, especially for silty clay and clay layers.

2. Section 4.2.2, Groundwater Flow Conditions:

This section provided information for the shallow groundwater gradient and flow direction, but lacked information on the deeper groundwater flow. Please provide a discussion on the deeper groundwater flow.

3. Figures 4-7 to 4-25:

For clarity of analysis, the results in each figure and table within the report should also provide its respective qualifiers (if any) along with the analytes and the concentration found. The figures should also list the appropriate action levels for each analyte. Currently, the figures and tables do not clearly identify the project specific action levels for contaminants in soil.

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4. Figures 4-7 to 4-25:

In order to show the correlation between the previous investigations at the site and the current findings, the expanded site inspection report should include concentrations and location information from past site investigations. The previous data sets should be reviewed and utilized in the development of the isoconcentration maps in this report.

5. Section 7, Summary, Conclusions, and Recommendations:

Please provide a rationale for the reason why 1,1-DCE is found in the shallow groundwater (10' - 20' interval) only. Since 1,1-DCE is a product of degradation of PCE, some concentration of it should also be detected in the deeper groundwater or in the soil. Please explain its absence in the hydrostratigraphic setting.

6. Section 6, Site Specific Risk Assessment:

The "Risk-Based Concentrations" in Appendix H are derived from the potential exposure to a maintenance/ utility worker scenario only. This may currently be true, but this site is proposed for a range of industrial uses. The Navy will need to assess the potential risks to a more general industrial worker to determine the clean-up criteria for this site.

7. Appendix G, Comparison of CPT and Visually-Logged Soil Lithology:

Please provide a discussion of the implication of this comparison.

If you have any questions regarding the above comments, please contact me at (562) 590-4897.

Sincerely,



Aaron Yue
Hazardous Substances Specialist
Office of Military Facilities

cc: See Next Page.

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