



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

5090.4
Ser 05BN.DR/0677
September 30, 1999

Mr. Aaron Yue
California Environmental Protection Agency
Department of Toxic Substances Control
5796 Corporate Way
Cypress, CA 90630

Dear Mr. Yue:

Enclosure (1) is a proposed change to the recommendation of the "Draft Preliminary Assessment (PA) Sampling Report for the 171 Group B Areas of Concern (AOC), Long Beach Naval Shipyard, Long Beach, California" issued July 27, 1999. AOC MISC 8 was originally recommended for further action in the form of additional characterization because of the detection of bis(2-ethylhexyl)phthalate (BEHP) above screening level during the February 1999 sampling event. Because BEHP is a typical laboratory contaminate and there is no historical information to indicate the potential for BEHP contamination at this site, a re-sampling effort (approved by the regulatory agencies) was performed on August 19, 1999, to confirm the existence or non-existence of BEHP. Based on the groundwater sampling results described in enclosure (1), the recommended action for AOC MISC 8 is changed to no further action. Request you consider this proposed change as part of your review of the subject Draft PA Report.

For questions or concerns regarding this matter, please contact Mr. Duane Rollefson at (619) 532-4712.

Sincerely,

A handwritten signature in black ink, appearing to read "Faiq Aljabi".

FAIQ ALJABI
Environmental Engineer
By direction of the Commander

Encl: (1) CDM Federal Programs Corporation letter, Subject: Contract No. N68711-96-D-2029, Delivery Order No. 014. Indefinite Quantity Contract for Hazardous Waste at Various Southwest Division Locations in California, Nevada, Arizona, and New Mexico. Group B Areas of Concern (AOC) Investigation, Long Beach Naval Shipyard, Long Beach, CA. Resampling Activities and Results, Building 54 Transportation Yard, of September 14, 1999.

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Copy to:
Ms. Ana Veloz-Townsend
California Environmental Protection Agency
Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Mr. Martin Hausladen
U. S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

Ms. Christine Houston
Environmental Planner
Port of Long Beach
925 Harbor Plaza
Long Beach, CA 90801-0570

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September 14, 1999
DOC. No. 5109

Mr. Duane Rollefson
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132

Subject: Contract No. N68711-96-D-2029, Delivery Order No. 014
Indefinite Quantity Contract for Hazardous Waste at Various Southwest
Division Locations in California, Nevada, Arizona, and New Mexico
Group B Areas of Concern (AOCs) Investigation
Long Beach Naval Shipyard, Long Beach, CA
Resampling Activities and Results, Building 54 Transportation Yard

Dear Mr. Rollefson:

CDM Federal Performed groundwater resampling activities at the Transportation Yard at Building 54 on 23 August 1999. Resampling was performed at one location as agreed with the regulatory agencies on 19 August 1999. This resampling effort was performed to confirm the detection of bis(2-ethylhexyl)phthalate (BEHP) in groundwater at a concentration of 0.088 milligrams per liter (mg/L) in February 1999 at sampling location MI8e (next to a paved-over sump). The result of 0.088 mg/L was above the Ocean Plan screening criteria of 0.0035 mg/L and above the common laboratory contamination level of 0.010 to 0.020 mg/L.

Activities and Results

CDM Federal and our subcontractor Transglobal Environmental Geochemistry (TEG) resampled groundwater south of Building 54 on the morning of 23 August 1999. Ms. Ana Veloz-Townsend from the Regional Water Quality Control Board (RWQCB) was present during resampling activities. Foster Wheeler had removed the sump in this area on 2 August 1999, leaving an open excavation pit. CDM Federal selected a sampling location at the edge of the pit, about 10 feet from the previous sampling location MI8e. Ms. Veloz-Townsend approved this sampling location.

Two groundwater samples were collected at this location. (Please see attached results.) One was collected using a stainless steel bailer (sample ID 99SY-M8eb-W-10.5), which avoided using tubing that was considered a possible source of BEHP. The analytical results (EPA Method 8270 for phthalates) showed detections of 0.0029 mg/L BEHP and 0.0152 mg/L dibutyl phthalate.

The second groundwater sample (sample ID 99SY-M8ea-W-10.5) was collected as in February 1999 using polyethylene tubing, along with silicone and Tygon connector tubing. The results for this sample showed detections of 0.016 mg/L BEHP and 0.0037 dibutyl phthalate.

The laboratory blank sample showed a detection of 2.1 mg/L dibutyl phthalate. Although the laboratory blank sample did not indicate the presence of BEHP, the laboratory director stated that other blank samples on recent days showed BEHP detections.

Conclusions

The sample results of 0.0029 and 0.016 mg/L BEHP in the two samples did not confirm the previously-reported concentration of 0.088 mg/L. In fact, they were more than five times lower.

In addition, at this site and other Areas of Concern addressed in the Draft Preliminary Assessment/Sampling Report for 171 Group B AOCs Report (dated 26 July 1999), concentrations of up to 0.020 mg/L were attributed to possible laboratory contamination. The fact that dibutyl phthalate was reported in the laboratory blank sample and that BEHP was reported in other blank samples on recent days suggests that laboratory contamination may have occurred and may have been the cause for BEHP reported in groundwater samples.

Recommendations

Based on the results presented above, CDM Federal recommends that No Further Action be required at the Transportation Yard at Building 54 (AOC MISC 8).

CDM Federal will incorporate the information above into the Final Report upon concurrence from the regulatory agencies.

If you have any questions, please call me at (858) 268-3383.

Sincerely,

A handwritten signature in black ink that reads "Larry Davidson". The signature is written in a cursive style with a large, prominent "L" and "D".

Larry Davidson, P.E.
Project Manager

CDM FEDERAL PROGRAMS CORPORATION

c: M. Orpilla (SWDIV)
D. Bjostad
B. Boyd
M. Smits
G. DeLullo
File



Report Summary

Client: CDM Federal
 Project: LBNSY AOCs

Matrix: water
 Units - ug/L

Method =	<----- 8270 ----->	
Analyte =	dibutyl phthalate	bis(2-ethylhexyl) phthalate
Detection Limit -	1	1
SAMPLE I.D.		
Date Analyzed: 9/2/99		
Method blank	2.1	nd
99SY-M8ea-W-10.5	3.7	16
99SY-M8eb-W-10.5	15.2	2.9

Footnotes:
 nd = Not found above the detection limit.

Analyses performed by: S. Kuhn/J. Picker
 CD082399