INTERNATIONAL TECHNOLOGY CORPORATION

January 18, 1994

Project No. 305957-ITCPR-0004

Ms. Lolita Batis
Code 2723
NAVFACCO, Building 90
Port Hueneme, CA 93043-5000

Contract: **N47408-92-D-3056**
Paints and Solvents
Site 11- Hillside East of Drydock 1
Long Beach Naval Shipyard

Subject: **Response to Department of Toxic Substances Control Comments, November 22, 1993**

Dear Ms. Batis:

IT Corporation (IT) is pleased to submit the Response To Department of Toxic Substances (DTSC) Control Comments. The comments were incorporated into CDRL Deliverable Number A0002 - Removal Action Work Plan. The format of the letter consists of DTSC's comments (*in italics*) followed by our response (**in bold**).

GENERAL COMMENTS

Comment 1.

Provide a stamped signature page by a State of California certified Professional Engineer.

Response to General Comment #1

The Final Workplan includes a stamped signature page by a State of California certified Professional Engineer.

SD/01-94/WP:neeas/30595701.L4

Comment 2.
All samples collected should be sealed in air-tight plastic bags prior to being stored in a cooler and maintained at 4 degrees Celsius temperature.

Response to General Comment #2

The samples were collected on 5 October 1993. The samples were placed in an air-tight plastic bags and then stored in a cooler and maintained at 4 degrees Celsius temperature.

Comment 3.
Section 3.14 states that the hillside containing sandblast waste will be irrigated prior to hydroseeding. Section 4.2 describes the installation of a sprinkler system designed to irrigate the hillside. Section 4.4 also states that the sandblast material will, in effect, be graded and wet down prior to placing topsoil. All the above actions potentially introduce water into the sandblast waste. Since the depth to groundwater is shallow (about 10 feet), and there is hydraulic continuity with the Gaspur Aquifer in the Drydock 1 area, we strongly believe that irrigating the site is inappropriate and must be kept to a bare minimum.

Response to General Comment #3

The sprinkler system will be designed to minimize infiltration and run-off from the slope. The objective will be to provide sufficient moisture within the root zone to support vegetation. The sprinkler system design is presented in Appendix D. The sprinkler system will consist of low pressure sprinkler heads and will be set to minimize run-off and infiltration. The sprinkler system will be controlled using a moisture sensing system. The system will measure the available soil moisture directly and will signal the controller when an irrigation cycle is required.

Comment 4.
Any infiltration of irrigation water flowing into the contaminated sandblast waste should be minimized, and controlled and monitored using a network of lysimeters. The proposed number and location of the lysimeters along with the monitoring frequency must be approved in advance by the Department.

Response to General Comment #4

The lysimeter network design is presented in Section 7.0. Two lysimeters will be installed to a depth of five feet below grade. The locations will include one lysimeter on the north slope near Building 300 and one lysimeter on the south slope near Building 174. A baseline monitoring sampling event will be performed prior to hydroseeding. Monthly samples will then be collected for a six month period. In addition, samples will be collected after a rainfall event of 1-inch or greater.

SPECIFIC COMMENTS

Comment 1.
Page 2-1, Paragraph 3, line 4 Identify the erosion gullies clearly on the Appendix C maps (C-1 thru C-3), and provide legible copies of the maps.

Response to Specific Comment #1

Construction drawings C-1 and C-3 have been revised to show the location of erosion gullies on the slope.

Comment 2.

Page 3-3, Paragraph 5, line 1 *Verify the imported soil integrity by sampling, and provide sampling results in the final Site Management Plan.*

Response to Specific Comment #2

The borrow soils will be imported by Technical Waste, Inc. The borrow source is a commercial source and Technical Waste, Inc. will provide a certificate that the soil is Class A topsoil and is free of contaminated materials.

Comment 3.

Page 3-4, Paragraph 4, line 1 *Clearly identify the straw bale barriers on maps C4 and C5 in Appendix C, and provide legible copies of the maps.*

Response to Specific Comment #3

The objective of Construction Drawings C-4 through C-6 are to detail the construction activities for the slope and the levels area. Existing conditions on these maps are printed using a lighter line weight (screened). Refer to drawings C-1 through C-3 for the existing conditions.

Comment 4.

Page 4-2, Paragraph 1 *Provide information on the sprinkler design modifications to help elevate some of the concerns regarding irrigation effect on groundwater or a drip irrigation system, or equivalent could be used instead of the sprinkler system.*

Response to Specific Comment #4

The sprinkler system design is presented in Appendix D of the Removal Action Plan.

Comment 5.

Page 4-2, Paragraph 3, line 5 States that exposed sandblast grit areas will be removed prior to placing new topsoil, and then used as fill material within the level area. Since contamination is known to exist at the site then all excavated material must be disposed at a Class III landfill. The backfill for the trenches must consist of clean materials.

Response to Specific Comment #5

As discussed during the telephone conference call on 29 November 1993, land disposal regulations do not apply because the material will not be transported off-site. The sand blast grit will be relocated within the level area to establish final grade. Excavated material will not be transported off-site.

Comment 6.

Page 5-1, Section 5.2 States that 10 test trenches will be dug at the site and backfilled with soil sandblast waste. Knowing the hillside consist of sandblast waste and high concentration of metals, all contaminated materials from the test pits must be disposed at a Class III landfill. The trenches backfills must consist of clean materials.

Response to Specific Comment #6

As discussed during the telephone conference call on 29 November 1993, the excavated material will be backfilled into the trench and compacted. The

objectives of the test trenches are to assess the vertical and horizontal extent of sand blast grit within the area. Land disposal regulations do not apply because the material will not be transported off-site.

Comment 7.

Page 5-1, Section 5.3 All sandblast grits removed must be disposed. Refer to specific comment number 5.

Response to Specific Comment #7

Refer to Response to Comment Number 5.

Comment 8.

Page 6-2, Paragraph 2, line 4 Describe method of disposal for water which analytical results exceeding the action levels.

Response to Specific Comment #8

Disposal of water that exceeds action levels are presented in Section 3.9. If the analytical results exceed the action levels, the water will be disposed at either Petroleum Recycling Corporation, or Southdown Environmental Systems (Rho-Chem Facility). These facilities are permitted to accept non-hazardous liquids. The analytical results will be submitted and a disposal application prepared. The water will be transferred from the storage tank into a vacuum truck and transported to the selected facility.

Comment 9.

Page 6-3, Table 6-1, Column 2, Row 1 *Define POTW on the acronyms list.*

Response to Specific Comment #9

The acronym list has been revised to include POTW.

Should you have questions, please contact the undersigned at (619) 554-0510.

Sincerely,

James J. Franklin

James J. Franklin
Project Manager

JJF:ra

cc: J. Jeffery, NEESA Code 112E4 (1 copy)
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