

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

Region 4  
245 West Broadway, Suite 350  
Long Beach, CA 90802-4444  
(310) 590-4868



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June 8, 1994

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NSY LONG BEACH  
SSIC #5090.3

Captain Barry Janov  
Commander Long Beach Naval Shipyard  
300 Skipjack Road  
Long Beach, California 90822-5099

Captain John Jones  
Commander Long Beach Naval Station  
Long Beach Naval Station  
Long Beach, California 90822-5000

Dear Captain Janov and Jones:

**REMEDIAL INVESTIGATION/ FEASIBILITY STUDY SUPPLEMENTS FOR LONG BEACH  
NAVAL SHIPYARD, LONG BEACH**

The California Department of Toxic Substances Control (Department) has completed its review of the following documents Draft Investigation Derived Waste (IDW) Management Plan, Draft Health and Safety Plan Supplement, Draft Data Management Plan, Draft Risk Assessment Work Plan and Draft Technical Memorandum Aerial Photography Review and Revised Sampling Recommendations, each dated April 25, 1994 and were prepared for SouthWest Division Naval Engineering Command by Bechtel National Inc. These documents are RI/FS Supplements for the Long Beach Naval Shipyard, Long Beach.

The Department has no comments on the Draft Health and Safety Plan. Regarding the Draft Risk Assessment Plan is acceptable but any changes or amendments to the risk assessment plan for Long Beach Naval Station should be incorporated into the assessment of all the terrestrial sites for Long Beach Naval Shipyard.

The Department has compiled general and specific comments on these documents from its internal technical staff and from the Regional Water Quality Control Board's (RWQCB). General and specific comments are enclosed within this letter.

If you have any questions regarding comments included with this letter please contact me at (310) 590-5565.

Sincerely,

A handwritten signature in cursive script that reads "Alvaro Gutierrez".

Alvaro Gutierrez  
Base Closure Team Member, LBNC  
Region 4 Base Closure Branch

Enclosures



Cpt. Barry Janov  
Cpt. John Jones  
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cc: Mr. Allen Winans HQ-24  
Program Coordination and Policy Development Branch  
Department of Toxic Substances Control  
400 "P" Street, 4th Floor  
P.O. Box 806  
Sacramento, California 95812-0806

Mr. Albert Arellano Jr., P.E.  
Base Closure Unit Chief  
Base Closure Branch  
Department of Toxic Substances Control  
Region 4  
245 West Broadway, Suite 425  
Long Beach, California 90802-4444

Mr. J. E. Ross  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754-2156

Ms. Anna Ulaszewski  
Environmental Protection Division, Code 106.31  
Long Beach Naval Shipyard  
Long Beach, California 90822-5099

Mr. Joseph Joyce  
Remedial Project Manager  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5181

Mr. Lester Kaufman, Chief  
Permits Section  
Hazardous Waste Management Division (H-3)  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105

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Cpt. John Jones  
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Ms. Gina Maria Gillette R4-4  
Environmental Assessment and Reuse Specialist  
Office of Base Closure and Conversion  
Department of Toxic Substances Control  
Region 4  
245 West Broadway, Suite 425  
Long Beach, California 90802-4444

Ms. Claire Best R4-4  
Public Participation Specialist  
Public Participation Unit  
Department of Toxic Substances Control  
Region 4  
245 West Broadway, Suite 425  
Long Beach, California 90802-4444

Mr. John Christopher HQ-24  
Office of Scientific Affairs  
Department of Toxic Substances Control  
400 "P" Street, 4th Floor  
Sacramento, California 95612-0806

Ms. Denise M. Klimas  
Coastal Resource Coordinator  
NOAA  
c/o U.S Environmental Projection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105

**DRAFT TECHNICAL MEMORANDUM  
AERIAL PHOTOGRAPHY REVIEW  
AND REVISED SAMPLING RECOMMENDATIONS**

**GENERAL COMMENTS**

With one exception, the proposed revisions to the sampling plan are acceptable. Lost in the decision tree process are the subsurface samples that were to be collected from the pit area. The decision tree does allow for dropping the use of surface geophysics to locate the pit on the ground if it were not seen on the aerial photographs. However, Tables 4-17 and 4-18 of the RI/FS SAP provide for subsurface sampling from monitoring well borings if deemed necessary. The Department believes that each time a boring is made through the sandblast grit disposal area during the RI/FS field work samples from 1.5 to 2 feet below the surface should be analyzed for organo-tins. Previous samples MW-43, MW-44, B-46 and B-47 were sampled at 5, 10 or 15 feet below the surface and that appears to be deeper than the sandblast grit as seen on aerial photography.

The Navy should sample subsurface soil from each wellpoint location shown on Figure 1 of the Technical Memo as southwest of Building 314 and west of the drum crushing area. Samples should be analyzed for the same suite of constituents as for the Site Inspection work (see RI/FS SAP Table 7-3) to allow for direct comparison of the results with the deeper samples in the immediate area.

**SPECIFIC COMMENTS**

1. Section 4.2 proposes testing some or all of the 9 well points for semi-volatile organic compounds (SVOCs) only if the groundwater analysis from the drum crushing area indicates that SVOCs are consistently present at concentrations which exceed SAP screening criteria. In the event that SVOCs are encountered in the drum crushing area, the Department will require that SVOC analysis be included in the contingency sampling plan for the proposed well points and monitoring wells.

Cpt. Barry Janov  
Cpt. John Jones  
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## **DRAFT INVESTIGATION DERIVED WASTE MANAGEMENT PLAN**

### **GENERAL COMMENTS**

1. The Investigation Derived Waste Management (IDWM) Plan only addressed hazardous waste. However, certain materials may be non-hazardous but may not be disposed as non-hazardous waste. (ie. petroleum hydrocarbon).
2. In Section 1.3 of the IDWM Plan, the Department assumes that the "centrally-located", roll-of bins and holding tanks which will be used to contain IDWM are site specific.

## DRAFT DATA MANAGEMENT PLAN

### GENERAL COMMENTS

The following comments are from Appendix C of the Data Management Plan:

1. The regulatory limit for the holding time for herbicide analyses is to be extracted within 7 days and analyzed within 40 days, not the 40 days after extraction as stated on page 3.
2. On Page 4, the preservation requirements for cyanide should also include pH of greater than 12.
3. On Page 5, the holding time limits for Total Petroleum Hydrocarbons are different for different analytical methods and are as follows:

418.1	28 days
8015M diesel	7/40 days
8015M gas	14 days
4. On Page 5, pH is best analyzed in the field or on the same day.
5. The holding time limits for Reactivity-Cyanide is 14 days and Reactivity-Sulfide is 7 days, not N/A as stated on Page 5.
6. On Pages 10 and 40, the Department will require corrective actions to be taken for all analytes where concentration exceed the spike concentrations.
7. On Pages 11 and 53, matrix spike actions should be applied when the matrix spike recoveries per fraction do not meet the required recovery windows.
8. The Department will reject any analytical results when the holding time limits are exceeded.