

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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

N60258.000610
NSY LONG BEACH
SSIC # 5090.3

November 23, 1993

Mr. Joseph Joyce
Project Manager
1220 Pacific Highway
San Diego, California 92132-5181

Dear Mr. Joyce:

**SITE 11 - HILLSIDE EAST OF DRY DOCK 1 (SITE MANAGEMENT PLAN) FOR
LONG BEACH NAVAL SHIPYARD, LONG BEACH, CALIFORNIA.**

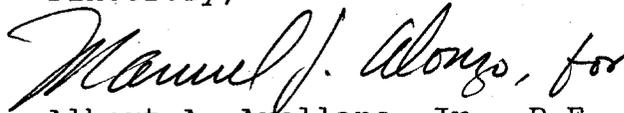
The California Department of Toxic Substances Control (DTSC) has completed its review of the Site Management Plan dated October 1993, for the Long Beach Naval Shipyard, Long Beach. The document was prepared by International Technology Corporation for Southwest Division Naval Facilities Engineering Command. We found the two alternatives selected to be protective of human health and the environment, and to be appropriate for the removal action. However, the Site Management Plan did not address project implementation, scheduling, public participation and meetings.

In the August 1993 Site Walk Report, the Navy stated that the Site-Specific Health and Safety Plan will be submitted with the Site Management Plan, which was not done. As a result, the Department's review and response time may be impacted.

For your information, the Comprehensive Environmental Response Compensation Liability Act (CERCLA) Community Relations Requirements must be implemented for all removal actions as per National Contingency Plan (NCP) 300.415(m)(1) and 300.820.

If you have any questions regarding comments enclosed with this letter, please contact Mr. Alvaro Gutierrez of my staff at (310) 590-5565.

Sincerely,



Albert A. Arellano, Jr., P.E., Chief
Region 4 Base Closure Unit
Base Closure Branch

Enclosures

cc: See next page.



Mr. Joseph Joyce
November 23, 1993
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cc: Mr. Alvaro Gutierrez
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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

Captain Kleven
Code 400
Long Beach Naval Shipyard
Long Beach, California 90822-5099

Ms. Anna Ulaszewski
Environmental Protection Division, Code 106.31
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Ms. Maria Gillette
Community Re-Use Specialist
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245 West Broadway, Suite 425
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Ms. Claire Best
Public Participation Specialist
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245 West Broadway, Suite 425
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Captain Barry Janov
Commander Long Beach Naval Shipyard
300 Skipjack Road
Long Beach, CA 90822-5099

GENERAL COMMENTS

1. Provide a stamped signature page by a State of California certified Professional Engineer.
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.
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 Gaspar Aquifer in the Drydock 1 area, we strongly believe that irrigating the site is inappropriate and must be kept to a bare minimum.
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.

SPECIFIC COMMENTS

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

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. Backfill must consist of clean material.
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.
7. Page 5-1, Section 5.3 All sandblast grits removed must be disposed. Refer to specific comment number 5.
8. Page 6-2, Paragraph 2, line 4 Describe method of disposal for water which analytical results exceeding the action levels.
9. Page 6-3, Table 6-1, Column 2, Row 1 Define POTW on the acronyms list.