

PROJECT NOTE NO. PN-240/250-41 CLE-C01-01F249/250-I3-0015	PROJECT NO. 01-F249/250-YS
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CONFIRMATION OF:	CONFERENCE	DATE HELD	N/A
	TELECOM	DATE ISSUED	24 September 1993
	OTHER	RECORDED BY	Kathy Brewer/CH2M HILL <i>[Signature]</i>
SUBJECT	X	PLACE	N/A
Contract Task Order (CTO) No. 249/250 Document Distribution and Response to Navy Comments Final RI/FS Work Plans, SAPs and HSPs			

PARTICIPANTS: (* DENOTES PART-TIME ATTENDANCE)

N/A

ACTION REQ'D. BY	ITEM
	<p>The Final Remedial Investigation/Feasibility Study (RI/FS) Work Plans, Sampling and Analysis Plans (SAPs) and Health and Safety Plans (HSPs) for the Naval Station (NAVSTA) Long Beach and the Naval Shipyard Long Beach (LBNSY) were submitted to Southwest Division, Naval Facilities Engineering Command (SWDIV) on 13 September 1993. The purpose of this project note is to record the distribution list for these documents and to document the response to specific Navy comments on the draft documents. A formal response to agency comments was prepared and distributed with the documents during the week of 13 September.</p> <p>DOCUMENT DISTRIBUTION</p> <p>The document distribution list is summarized in the attached table.</p> <p>In addition, the agency comment response document was sent along with a cover letter from the activity to the following members of the technical review committee (TRC):</p> <ul style="list-style-type: none"> o Maria Gillette/Department of Toxic Substances Control (DTSC) o Claire Best/DTSC o Jenny Au/Regional Water Quality Control Board (RWQCB) o H.J. Duensing/City of Long Beach o Teresa Van Andler/South Coast Air Quality Management District (SCAQMD) o Carolyn Douglas/U.S. Environmental Protection Agency (EPA) Region IX o Gerhart Felgemaker/City of Long Beach o Wesley Greenwood/Southern California Edison o Cheryl Sandel/City of Long Beach o Mark Helvey/National Marine and Fisheries Service o Tom Johnson/Port of Long Beach o Lester Kaufman/EPA, Region IX

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- o Betsy Mitchell/Port of Los Angeles
- o Richard Nitsos/California Department of Fish and Game
- o Jeff Grovhoug/Naval Command, Control, and Ocean Surveillance Center
- o Howard Hargrove
- o Bob Hoffman/National Marine Fisheries Service
- o Mike Murchison/City of Los Angeles
- o Claire Randall/Los Angeles Harbor Boat Owners Association
- o Mickey Rivera/U.S. Fish and Wildlife Service
- o Bill Thompson/SCAQMD

RESPONSE TO NAVY COMMENTS:

The following sections contain a response to specific comments received from the Navy on the Draft RI/FS Work Plans and SAPs. Unless otherwise noted, all editorial comments have been incorporated.

Rex Calloway

2. The list of EPA documents for the baseline risk assessment (BRA) was updated to include documents referenced in the Camp Pendleton BRA Work Plan and a previous letter from John Christopher/DTSC listing suggested guidance documents. A caveat was added for the State guidance documents.
3. Deleted "remote" from referenced text.
4. The State Applicable or Relevant and Appropriate Requirements response letter dated 9 April 1993 was added to Appendix A as an attachment with a disclaimer that the Department of the Navy is neither accepting or approving them at this time.

Jan Corbett

Work Plan:

- a. As discussed in the response to agency comments, the screening risk assessment for soil was changed to include ingestion, inhalation of volatiles, inhalation of dusts, and dermal contact for both the residential and industrial disposal scenarios. Jan Corbett reviewed the revised screening risk assessment criteria prior to our finalizing the RI/FS Work Plans and her subsequent comments were incorporated.
- c. Language was added to Section 2.3 to clarify that the screening risk assessment is used only as a tool for defining data quality objectives. A full risk evaluation will be part of the baseline risk assessment.
- d. The revised table refers to the residential and industrial exposure scenarios, as defined in Appendix B.
- e. Comment incorporated.



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- f. Language was added to Section 3.3.3 to clarify that these are preliminary evaluations of the relative importance of these exposure pathways and that a complete exposure pathway evaluation will be provided as part of the baseline risk assessment.

Appendix B:

Appendix B has been rewritten to document the revised approach to the screening risk assessment for soils. Oral reference dose for mercury was corrected.

Health and Safety Plan:

As Ms. Corbett stated in her comments, the HSP is incomplete since the field team was not identified at the time the plan was written. The Comprehensive Long-term Environmental Action Navy (CLEAN) II contractor will be preparing their own HSP, which will be reviewed by the Navy prior to the implementation of site work. The HSP included in these planning documents will be used by the CLEAN II contractor as a reference.

Specific Comments on SAP:

- a. The requirement for having an approved Waste Management Plan (WMP) prior to the start of field work is addressed in Section 4.4.7 of the SAP. The WMP will address coordination with the base personnel and other waste management issues associated with specific sampling activities.
- b. The glove requirements for sampling are outer nitrile gloves with latex or nitrile inner gloves, as described in Section 5.0 of the HSP. "Surgical" gloves are the most commonly used latex gloves. Here they will be used as inner gloves.
- c. The WMP will identify a base point-of-contact for waste storage and disposal coordination issues.
- d. The decontamination method for the harbor sediments sampling equipment is described in Section 6.7.5. The WMP will address the disposal of the decontamination liquids. In general, the liquids will be held in a container on the sampling vessel for later disposal.

Specific Comments on HSP:

- a. The HSP has been written to address all of the sites at NAVSTA Long Beach and LBNSY. Table 3-1 has been added to identify the hazards/risks for each task at each site. Section 3.8 lists chemicals of concern for the sites and provides toxicity information, the allowable exposure levels, and information on which site or sites had the highest levels of these contaminants. The levels of protection required are based on the types of tasks to be performed and the results of the air monitoring. The personal protection equipment (PPE) requirements are listed in Section 5.0. Section 6.0 has been revised to specify the type of monitoring required for each task at each site. Introduction has been revised to cite Title 8, Section 5192.



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- c. The names of health and safety personnel will be provided in the HSP prepared by the CLEAN II contractor.
- d. The 3-day on-the-job experience is included in Section 2.3.1 as a requirement for field personnel.
- e. Hearing protection has been removed as an engineering or administrative control for buildup of explosive gases.
- f. During the Initial Assessment Study in 1983, operations at NC Long Beach were examined for possible sources of radioactive waste materials. No radiologic hazards were identified.
- g. The PPE requirements are listed in Section 5.0 by type of task and protection level. The required level of protection (B, C, or D) is determined by the action levels listed in Section 6.0 for the air monitoring program.
- h. Section 6.0 has been revised to specify the type of monitoring required for each task at each site. The HSP prepared by the CLEAN II contractor may identify other personnel monitoring requirements if there will be high risk individuals present at the site.
- i. The text has been revised to state that the calibration checks will be done at the beginning and end of each day.
- j. The WMP will address all aspects of waste management and disposal.
- k. The emergency response information will be completed in the plan prepared by the CLEAN II contractor.

CDMR John Snyder

CDMR Snyder's comments on the Draft NAVSTA Work Plan and SAP were incorporated. FW in Table 2-1a in Appendix A of the SAP refers to the facilitywide investigation.

C. Anna Ulaszewski

Unless otherwise noted, all editorial comments were incorporated and are not addressed below.

General Comments:

- 4. The Former Quonset Hut site has been added to maps showing Site 9.
- 5. References to residential housing on the Naval Complex (NC) have been deleted. The text now refers to quarters for some Navy personnel.

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Work Plan Comments:

1. The harbor will be handled as one entity under the NAVSTA Long Beach RI, as detailed in the NAVSTA Long Beach Work Plan.
3. The text has been revised to state that the key decisionmakers involved in these meetings were the NAVSTA Long Beach and LBNSY Remedial Project Managers and program managers.
4. The text has been revised to indicate that the port activities are located both east and west of the facility on Terminal Island.
5. Section 3.2.3 has been revised to more accurately reflect the wastewater management for NC Long Beach.
6. Text has been revised to delete reference to housing units.
7. Text has been revised to state that discharge to the Publicly Owned Treatment Work (POTW) from NC Long Beach is regulated by a Wastewater Discharge Permit.
10. The information that we have is that the foundation for the Building 129 may be as much as 6 feet thick. If the preliminary investigation activities indicate that the floor is more than 12 inches thick, then no sampling will be done beneath the slab.
11. The maps for Site 12 have been updated to indicate that all of Lot X has been identified as part of the site.
12. The text has been revised to state that the site operated from the early 1970s until the present.

SAP Comments:

3. In general, the usefulness of ground-penetrating radar and electromagnetic techniques is limited at NC Long Beach due to the fine grain nature of the hydraulic fill material and the relatively high conductivity (from high salinity in the pore fluids) of the vadose zone soil. However, because of the limited area involved and the importance of locating the disposal pit at Site 12, these geophysical techniques may be tried along with the magnetometer if disposal areas are identified at Site 12 in the aerial photograph review. The sampling approach outlined for Site 12 has a contingency (i.e., site boundary monitoring with temporary well points) in the likely event that these techniques are not successful.
4. The referenced text has been revised and Table 10-1 in the Work Plan has been updated to be consistent with the SAP.
5. The text goes on to state that if the NAVSTA Long Beach RI/FS is implemented first, then the facilitywide sampling will only be conducted at the locations on

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NAVSTA Long Beach. When the LBNSY RI/FS begins, the data from the LBNSY RI/FS will be combined with that from the NAVSTA Long Beach RI/FS to provide a more complete picture of facilitywide hydrogeologic conditions and background concentrations.

Chris Leadon

General Comments on Work Plans:

- a. All computer files for the documents will be transmitted to the CLEAN II contractor.
- d. Text has been added to Sections 2.3.1 and Section 10.5 to indicate how a horizontal dispersion model for groundwater may be used to define cleanup goals for the FS. The model to be used is not specified since there are many that may be useful for the site and it is up to the contractor implementing the RI to determine which one is preferred. However, the facilitywide assessment has been set up to provide the required groundwater flow and aquifer information to support a variety of models.

Specific Comments on Work Plans:

- a. The screening risk assessment method for soil has been revised. Please see response to Jan Corbett's comment on this subject.
- c. The Purpose and Scope section was left where it was in Section 1 since it requires some background understanding of the facility.
- d. The attachment was not retyped because of the significant time (and expense) that would be involved. The table is taken from the original reference document and is readable.
- f and g. The copies of these figures in the Final Work Plans are the best that could be made off of the master copies that we have.
- h. Figure corrected.
- i. Figure 6-1 and Table 6-1 have been added to Appendix A.

Sites 1 and 2:

- a and b. The sampling locations for Sites 1 and 2 are shown in the SAP.

Site 4:

- a. A conceptual cross section of the sampling locations in the fill area of Site 4 has been added as Figure 6-7.



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Site 6A:

- a and b. Site 6A is not adjacent to the harbor and the water table there is not expected to be affected significantly by tidal fluctuations. As shown on Table 3-2, a very small difference was seen in water table elevations between high and low tide, even on the Mole.
- c. The FS will address the potential effectiveness of the remedial actions suggested. They are included here only to aid in the identification of potential data needs.

Site 7:

- b. The SAP describes the rationale for the sampling program proposed and includes a discussion of the statistical significance of the sample numbers selected.
- c. Background conditions in the greater Long Beach Harbor area will be assessed by collecting samples from the reference stations discussed in Appendix D. The sediments from the reference stations will be analyzed for the potential contaminants of concern. Bioassay and bioaccumulation tests will also be done on sediments from these locations to assess background toxicity. Background will be considered when developing remedial goals. The screening criteria are definitely not ARARs since they are not promulgated; however, they would instead be "to-be-considered" criteria, on the same level as other guidance documents.
- d. The current sampling approach does separate scoured areas (main harbor area) from unscoured or depositional areas (under piers and in the corners of the harbor).
- e. I spoke with Bruce Hagadon in Port Services at NC Long Beach, and he said that only shallow-draft service vessels come in and out of the area between Pier 9 and Pier 7. He said that the water there is fairly shallow (approximately 20 feet), so deeper draft vessels cannot get into that corner. He confirmed that deep-draft vessels dock at Pier 9, but they stay close into the pier. So the northwest corner of the harbor is still a separate depositional area of concern.
- f. I spoke with Rich Davidson from the Port of Los Angeles who has access to stormwater drainage information for that area. He said that to his best knowledge, all of the storm water from north of Ocean Blvd. drains either north or east, and none of it discharges to the West Basin of Long Beach Harbor. Text has been added to Section 3.2.3 to clarify this.
- g. A bathymetric map of the harbor has been added to the NAVSTA Long Beach Work Plan as Plate 3.

Site 9:

- a. The sampling locations for Site 9 are shown in the SAP. A cross section was not added since the depth of the wells to be installed is dependent on the data from



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the temporary well points. In general, groundwater will be sampled just below the water table, halfway between the water table and the aquitard and just above the aquitard. If contamination is found at the aquitard, then a well will be installed to characterize the upper part of the Gaspur Aquifer.

- b. The sampling is set up as a two-step process. Fast-turnaround analysis for volatile organics will be done on the Step 1 samples from the temporary well points. These results will be used to determine the appropriate placement of the monitoring wells to be installed in Step 2.
- c. Wells would be installed within and downgradient of the plume regardless of whether deep contamination is found. If deep contamination is found, then wells would also be installed at depth to characterize the groundwater concentrations for the risk assessment and provide for long-term monitoring.
- d. The SAP details the methods to be used for drilling through the aquitard.

Nonparticipant Distribution

- P. Torrey - CH2M HILL
- C. Leadon - Code 1852.CL
- J. Corbett - Code 1852.JC
- R. Callaway - Code 09C.RC
- D. Rollefson - NAVSTA/Long Beach
- A. Ulaszewski - LBNSY
- Lt. Cdr J. Snyder - NAVSTA/Long Beach

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Document Distribution List				
Recipient	NAVSTA Work Plan	NAVSTA SAP	LBNSY Work Plan	LBNSY SAP
SWDIV				
Alan Lee	4	4	4	4
Joseph Joyce	4	4	4	4
Ken Reynolds	1	1	1	1
Activities				
Duane Rollefson	5	5	1	1
Anna Ulaszewski	3	3	7	7
Regulatory Agencies				
Craig O'Rourke	1	1	1	1
Allen Winans	1	1	1	1
John Christopher	1	1	1	1
Michael Lyons	1	1	1	1
Jim Ross	1	1	1	1
Alvaro Gutierrez	1	1	1	1
Jerry Early		1		1
TRC				
Bob Kanter	1	1	1	1
Denise Klimas	1	1	1	1
AR Files/Information Repositories	5	5	5	5
Total	29	30	29	30