

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
245 West Broadway, Suite 350
Beach, CA 90802-4444



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NSY LONG BEACH
SSIC #5090.3

September 2, 1993

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

Lieutenant Commander J.L. Snyder
Civil Engineer Corps, U.S. Navy
Long Beach Naval Station
Long Beach, California 90822-5000

Dear Captain Janov and Commander Snyder:

DRAFT SUPPLEMENTAL RCRA FACILITY INVESTIGATION WORKPLAN AND INTERIM CORRECTIVE MEASURE EVALUATION WORKPLAN (INSTALLATION RESTORATION PROGRAM RSE WORKPLAN) FOR SITE 6A: LONG BEACH NAVAL SHIPYARD AND LONG BEACH NAVAL STATION (EPA ID NO. CA6170023109)

The California Department of Toxic Substances Control (Department) has completed its review of the Draft Supplemental RCRA Facility Investigation (RFI) and Interim Corrective Measure Workplans (RSE Workplan) for potential soil contamination at Site 6A. The workplan was received by the Department August 20, 1993. The workplan was submitted in accordance with the RCRA Corrective Action requirements of the Hazardous Waste Facility Permit issued to the Long Beach Naval Shipyard in May of 1990.

This Supplemental RFI Workplan for Site 6A was prepared to complement the activities scheduled under the Long Beach Naval Complex basewide RFI (RI/FS) Workplan which is due to be finalized in September 1993. Upon completion of the workplan activities and following submittal to, and approval by, the Department of a Final RFI Report, the Navy may proceed to submit to the Department a Corrective Measures Study and/or Statement of Basis for proposed final and interim corrective measures for soil contamination at Site 6A.

The Department has compiled comments from its internal technical staff regarding the workplan, risk assessment, Field Sampling Plan, Quality Assurance Project Plan, Waste Management Plan and Data Management Plan. The comments are included as Attachments A-C of this letter. The Department's comments on the Health and Safety Plan will be sent under separate cover. In addition, we have included comments from the from the Los Angeles Regional Water Quality Control Board as Attachment D. The following list provides the name and position of the specific individual whose comments are included within each attachment:



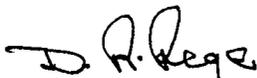
Cmndr Janov and Lt. Cmndr Snyder
September 2, 1993
Page 2

- Attachment A: John P. Christopher, Ph.d., D.A.B.T.
Staff Toxicologist
Human and Ecological Risk Section
Office of Scientific Affairs
Department, Sacramento
- Attachment B: Allen R. Winans, C.E.G.
Associate Engineering Geologist
Program Coordination and Policy Dev. Branch
Department, Sacramento
- Attachment C: Craig A. O'Rourke
Hazardous Materials Specialist
Facility Permitting Branch
Department, Region 4
- Attachment D: Jim Ross, Chief
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region

Upon submittal of the Final Supplemental RFI Workplan, please attach a cover letter to the workplan which includes a list of revisions from the draft editions. The list of revisions must clearly identify all the changes by both section and page numbers. Please submit a copy of the Final workplan to all individuals whose comments are included as attachments with this letter.

Any questions regarding the comments included with this letter should be directed to Mr. Craig O'Rourke (Regulatory Project Manager for the RCRA Corrective Action at the Long Beach Naval Complex) of my staff for appropriate action. Mr. O'Rourke can be reached at (310) 590-4875.

Sincerely,



D. (Anand) R. Rege
Unit Chief
Facility Permitting Branch

Attachments (4)

cc: See next page

Cmdr Janov and Lt. Cmdr Snyder
September 2, 1993
Page 3

cc: Mr. Albert Arellano, Jr., P.E.
Unit Chief
Base Closure Branch
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, California 90802

Mr. Craig O'Rourke
Facility Permitting Branch
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, California 90802

Mr. John Christopher
Office of Scientific Affairs
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95612-0806

Mr. Allen Winans
Program Coordination and Policy Development Branch
Department of Toxic Substances Control
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P.O. Box 806
Sacramento, California 95812-0806

Mr. Alvaro Gutierrez
Waste Management Engineer
Base Closure Branch
Department of Toxic Substances Control
245 West Broadway, Suite 350
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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
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Long Beach, California 90822-5099

Mr. Duane Rollefson
Naval Station Long Beach
Environmental Division
Code N46, Bldg. 1, Room 271
Long Beach, California 90822-5000

Cmndr Janov and Lt. Cmndr Snyder
September 2, 1993
Page 4

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

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Remedial Project Manager
Southwest Division
Naval Facilities Engineering Command
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San Diego, California 92132-5181

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

Dr. Robert Kanter, Manager
Environmental Planning
Port of Long Beach
P.O. Box 570
Long Beach, California 90801

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

Ms. Betsy Mitchell
Environmental Scientist
Port of Los Angeles
P.O. Box 151
San Pedro, California 90733-0151

Ms. Maria Gillette
Community Re-use Specialist
Department of Toxic Substances Control
245 W. Broadway, Suite 350
Long Beach, California 90802

Memorandum

To : Craig O'Rourke
Facilities Permitting Branch, Region 4
245 W. Broadway, Suite 350
Long Beach, California 90802-4444

Date: 24 August 1993

From : Office of Scientific Affairs (OSA)
400 P Street, 4th Floor
P. O. Box 806
Sacramento, CA 95812-0806
Voice: (916) 255-2038 Fax: (916) 255-2093 (ATSS 8-494-2038,2093)

Subject : Long Beach Naval Complex, Site 6A
PCA Code: 14650 Site Code: 400289-43

Background

Long Beach Naval Complex (LBNC) is in Los Angeles County, in the immediate vicinity of the ports of Los Angeles and Long Beach. The complex is composed of Long Beach Naval Station (LBNS), a military base, and Long Beach Naval Shipyard (LBNSY), a drydock facility capable of servicing very large vessels. LBNS is slated for closure in the 1990's. Currently, the Navy is conducting a RCRA Facility Investigation (RFI) which includes the entire complex. Region 4 has asked OSA to provide ongoing support in areas of toxicology and risk assessment related to the RFI.

Site 6A is a parcel of LBNC slated for transfer to the Port of Los Angeles (POLA). Investigation of Site 6A is being combined with construction activities related to a POLA project known as Pier 300. Activities at Site 6A are proceeding on an accelerated schedule, compared to the RFI for the remainder of LBNC.

Document Reviewed

We reviewed "Draft Removal Site Evaluation Plan for Site 6A, Naval Station, Long Beach, CA". This document was prepared by Bechtel Corporation, contractors to the Navy. It is dated 20 August 1993. OSA review is confined to Sections 5 and 6, which deal with data evaluation risk analysis.

General Comments

1. The document was reviewed for scientific content. Minor grammatical or typographical errors that do not affect the interpretation have not been noted. However, these should be corrected in the final version of the document.

2. Future changes in the document should be clearly identified. This may be done in several ways: by submitting revised pages with the reason for the changes noted, by the use of strikeout and underline, by the use of shading and italics, or by cover letter stating how each of the comments hereunder has been addressed.

Specific Comments

1. **Modelling, Section 5.2, p. 12-13:** Specify the methods to be used for estimating environmental fate and transport of contaminants. Detailed descriptions of models to be used, together with default parameters, should be approved by the Department prior to their use. Actual computer output of models should be included with draft and final reports.
2. **Guidance for Risk Evaluation, Section 6, p. 13 ff.:** List the principal guidance California and/or Federal guidance documents under which health risk will be assessed.
3. **Identification of Constituents of Concern, Section 6.1.1, p. 14:** The method of eliminating chemicals of potential is not consistent with USEPA "Risk Assessment Guidance for Superfund, Human Health Evaluation Manual, Part A" (RAGS Part A) nor is it consistent with methods described in the RI/FS Workplan for LBNC. Screening procedures should be used for eliminating sites, not chemicals. Follow these guidelines:
 - a. If few chemicals are detected, say less than 25, do not eliminate any from the risk assessment.
 - b. Eliminate inorganics which occur at concentrations within those of background. Use statistical tests approved by OSA for this comparison.
 - c. Perform "concentration/screening" separately for carcinogens and non-carcinogens. Use Section 5.9.5 of RAGS Part A as an outline.
 - d. For non-carcinogens, sum the ratios of the maximum concentrations detected to health-based screening values (i.e. concentrations associated with a hazard quotient of unity in a residential setting). If the sum exceeds unity, rank detected non-carcinogens by their ratios and retain those chemicals which contribute the upper 95% of the sum.
 - e. For carcinogens, sum the ratios of the maximum concentrations detected to health-based screening levels (i.e. levels associated with an incremental cancer risk of 1×10^{-6} in a residential setting). If the sum exceeds unity, rank detected carcinogens by their ratios and retain those chemicals which contribute the upper 95% of the sum.

4. **Toxicity Assessment, Section 6.1.2, p. 14:** The RI/FS Workplan for LBNC described cancer potencies using the more conservative of values published by both Cal/EPA and USEPA. Both these sources should be used for Site 6A. Also, chronic reference doses should be used for the residential scenarios, including exposures for children, while subchronic reference doses may be used for the construction worker scenario due to its duration of just 100 days.
5. **Exposure Point Concentrations, Section 6.1.3, p. 15:** Calculate the mean concentration and 95% UCL of the mean using detected values and one-half the SQL for non-detects. Use the 95% UCL on the mean concentration regardless of the relation of this number to the maximum value detected. It is not acceptable to exclude values due to elevated SQLs.
6. **Exposure Assumptions, Section 6.1.3, pp. 15-16:** Justification in addition to "professional judgement" must be provided for use of a duration which differs from default assumptions published by USEPA and Cal/EPA:
 - "Human Health Evaluation Manual Supplemental Guidance: Standard Default Exposure Factors", USEPA, OSWER Directive 9285.6-03, 25 March 1991
 - "Default Exposure Parameters", Chapter 1 in "Supplemental Guidance for Human Health Multimedia Risk Assessments of Hazardous Waste Sites and Permitted Facilities", Cal/EPA Office of the Science Advisor, July 1992

For the on-site worker, customary exposure duration is 25 yr, not 5 yr. Also, the ventilation of 20 m³ represents an 8 hr workday. Thus, 2.5 m³/hr should be used, not 0.83 m³/hr.

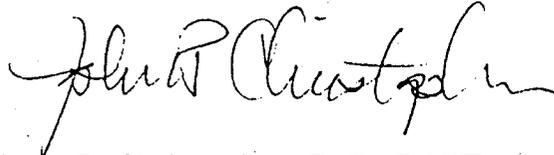
For the future excavation worker, use 480 mg/day for soil ingestion, not 50 mg/day. Additionally, we are not familiar with the parameter "pore gas velocity". How will this be used? Local meteorological data should be used to select a default value for average wind velocity. At this coastal site, the value will assuredly be greater than 1.0 m/sec.

7. **Residential Scenario:** The Navy has stated on earlier occasions that they intend to assess risks in a residential setting at LBNC, but no mention of a residential scenario is made in this work plan. Has the Navy altered its position?

Conclusion

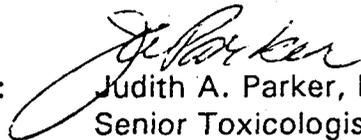
C. O'Rourke
24 August 1993
Page 4

The work plan for the risk assessment at Site 6A is not acceptable in its current form. We will work with the Navy and its contractor to secure approval of an acceptable final work plan. Please call us with any questions.



John P. Christopher, PhD, DABT
Staff Toxicologist
Human and Ecological Risk Section (HERS)

Reviewed by:



Judith A. Parker, PhD, DABT
Senior Toxicologist, HERS

Memorandum

Craig O'Rourke
Site Mitigation Branch
245 West Broadway, Suite 350
Long Beach, California 90802

Date: August 26, 1993

From : Program Coordination and Policy Development Branch
400 P Street, 4th Floor
P.O. Box 806
Sacramento, California 95812-0806

Subject: Long Beach Naval Complex Site 6A RSE

INTRODUCTION

Per our agreed to review schedule of the meeting of August 11, 1993 I have reviewed the Draft Removal Site Evaluation Plan For Site 6A - Naval Station Longbeach, CA (the plan), dated August 20, 1993. This plan was produced for the Navy by Bechtel National, Inc, and is not signed by a geologist or civil engineer registered by the State of California.

The plan includes five parts; the Workplan, Field Sampling Plan, Quality Assurance Project Plan, Waste Management Plan, and the Data Management Plan. The Health and Safety Plan was provided under separate cover.

Typographic errors and other minor items are not addressed in this memorandum. The Health and Safety Plan is not reviewed here. My comments address only the geologic and hydrogeologic aspects of this plan.

This plan is designed to only address the immediate needs of collecting and analyzing soil samples, taken from very shallow depths, as a way to perform an early risk assessment for the purposes of constructing a temporary road and railroad crossing that may restrict our ability to perform the formal site characterization. The shallow soil investigation is designed to complement the later studies, not as a substitute for deeper soil and ground water characterization.

CONCLUSIONS

This plan, with the recommended clarifications below, is adequate to direct collection of surface and shallow soil samples for laboratory chemical analysis.

All future documents (including the finalized version of that reviewed here) containing descriptions of geology, geophysics, ground water chemistry or flow, or engineered features, plans for investigating such, or interpretations of physical conditions must be signed by a geologist or engineer registered by the State of California.



SPECIFIC COMMENTS and RECOMMENDATIONS

Part I Workplan

No comments

Part II Field Sampling Plan

Section 4.2 Sampling Location and Rationale

The un-numbered figure showing the sample locations does not show the road crossing location or which samples are those designated for collecting the ten samples at seven feet. The rationale for the location of the ten deep samples is not provided. The locations should be in transverse alignments across the site where the road and railroad crossings are planned.

Please provide the location of the road crossing, the locations and the rationale for the locations of the ten soil samples to be taken at seven feet deep.

Section 4.4.1 Utilities Preparation and Survey,

4th bulleted item:

Stating that geophysical equipment will be used where appropriate is inadequate. The equipment should include ground penetrating radar and magnetometry.

Please state explicitly which geophysical equipment will be used, the range of frequencies, wavelengths, and speeds to be tried to optimize responses or resolving capabilities, the grid points for taking readings, and the alignments of towing or walking equipment.

5th bulleted item:

This item states that each boring location will be hand augered to seven feet prior to using powered equipment. This is in conflict with Section 4.4.3.

Please reconcile the methods described in Sections 4.4.1 and 4.4.3.

The text does not describe whether sampling locations will be altered or simply dropped from the program when an obstruction occurs at or below the surface. Alternative locations should be part of the plan.

Please provide guidance to the field personnel regarding alternative locations for sampling of surface, shallow, and the deepest soil samples.

Section 4.4.3 Subsurface Soil Sampling

The plan does not discuss the sampling method for collecting samples at the four foot level. The implication, by reading the sampling method for the deepest samples is that those at four feet will be collected using the hand auger method.

Please specify explicitly the sampling method to be used for collecting soil samples at four feet.

Note again, that this section does not agree with Section 4.4.1. See above.

The plan does not discuss the method of driving the sampler. The sampler should be driven using standard methods.

Please cite the ASTM method(s) to be followed while driving the samples.

The plan cites a 6 - inch outside diameter flight auger as the method for advancing the borehole to the seven foot sampling depth. Such an auger usually has an inside diameter of about 2 1/2 inches. This may not accept a California Modified Sampler that is 36 inches long.

Please consider the mechanics of the proposal and revise the plan, if necessary.

Part III Quality Assurance Project Plan

Section 2.1 Definition of Data Quality Objectives for RSE

Field Measurements:

The reference to Table 2-1 (immediately following) should not be for detection limits but rather, should be the acceptable precision for field measurements.

Please change the reference.

Table 2-1, Tolerance Limits for Field Measurements:

Depth of Water should be changed to Depth to Water, and the " Tolerance Limit " should be 0.01 feet rather than 0.1 feet.

Part IV Waste Management Plan

No comments

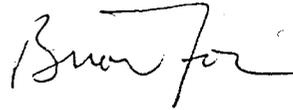
Part V Data Management Plan

This portion of the plan discusses electronic storage and retrieval of data. No mention is made of providing field data such as boring logs. It is important that the regulators are provided field logs that they may make independent determinations about the quality of the field work, subsurface conditions, and comparisons to the consultant's interpretations of the data; without the raw field data the regulators can only read the consultant's interpretations.

Please provide copies of all field logs to DTSC, including:

- Driller's logs
- Boring / Geologic logs
- Trench logs
- Well and piezometer Construction logs
- Borehole and surface geophysics logs including digitized recordings
- Well development logs
- Geologic maps

If you have any questions or comments, please call me at (916) 255-2104 or Calnet at 8-494-2104.



Allen R. Winans
C.E.G. No. 1402
Associate Engineering Geologist



Concur: Brian Lewis
 C.E.G. No. 1414
 Senior Engineering Geologist
 Permitting and Enforcement
 Geological Support Unit

ATTACHMENT C

Department of Toxic Substances Control, Region 4
245 W. Broadway, Suite 350
Long Beach, California 90802

General and Specific Comments on the Supplemental RFI Workplan and Interim Corrective Measures Evaluation (RSE Workplan) for LBNC Site 6A:

General Comments

1. The Department appreciates that all parties have agreed to an aggressive schedule for Site 6A, however, the Department will not accept a sacrifice in the quality of documents submitted for review due to tight submittal commitment dates (i.e. all documents should be reviewed for administrative and technical quality prior to submission). Some sections of the workplan did not appear to be coordinated with one another. Little effort was made to obtain appropriate guidance from the Department concerning specific aspects of the workplan (i.e. the risk assessment section). As a result, more work will be required to bring the workplan in order than might otherwise have been the case. In addition, boilerplate language was given that does not apply to this investigation.
2. Reference is made throughout the workplan to CLEAN II Standard Operating Procedures. Where can the Department obtain copies of these SOPs?
3. The Department has informed the Navy on numerous occasions that all work being conducted on the thirteen sites identified for investigation and potential remedial action under the RCRA Facility Assessment, as referenced in the Hazardous Waste Facility Permit for Long Beach Naval Shipyard, is to be conducted in accordance with RCRA Corrective Action methodology. Site 6A is included as one of the aforementioned thirteen sites. The Department appreciates the need for consistency within the Navy's Installation Restoration Program, and to this end, the Department has accepted a uniform naming convention for documents submitted (i.e. CERCLA terminology). However, for all interested and responsible parties involved with and overseeing the process, documents submitted to the Department should contain language in the introductory sections that explains the appropriate authority and regulatory background of the facility and the document submitted.

4. The Department hereby requests that the final workplan submittal include a to scale map of Site 6A. The map should clearly delineate the exact areas of the site that will be utilized on a permanent basis by the Port of Los Angeles's railroad right of way and grade separation project. In addition, the area to be utilized on a temporary basis for the diversion of Seaside Avenue should also be identified. The Navy should consider additional judgmental sampling and analysis of environmental properties, and a further evaluation of geotechnical parameters in these areas to more completely characterize the site for future uses.

Specific Comments: RSE Workplan

1. Section 1.2

Add reference to the Corrective Action authority of the Long Beach Naval Shipyard Hazardous Waste Facility Permit. The RSE Workplan should also be known as a Supplemental RFI Workplan and Corrective Measures Evaluation specifically addressing the soils at Site 6A. See General Comment #3.

2. Section 3.0: Objectives

Bullet 1: Documentation should be provided that clarifies how the RSE workplan investigation and report will supplement and be synthesized with the RI/FS workplan scheduled for Site 6A.

Bullet 2: Reference is made to delineating the shallow soils (0-5 foot bgs), however, later sections refer to ten subsurface (7-10 foot bgs) borings and sample collection points. The Department expects all unsaturated soils (regardless of depth) within Site 6A will be characterized and delineated.

3. Section 5.1.3: Borings and Sampling

This section refers to sample collection at five foot increments while Table 2 in the FSP refers to four foot samples. This section also refers to ten subsurface (7-10' bgs) samples, but no justification is given as to where these might be located.

Specific Comments: Field Sampling Plan

4. Section 4.2: Sample Locations and Rationale

How will the selection of the location for the ten subsurface (7-10' bgs) samples be determined?

5. **Section 4.2: Sample Locations and Rationale**
The Navy should consider proposing additional judgmental sampling locations in the area of the permanent railroad right of way. See General Comment #4.
6. **Section 4.3: Analytical Parameters/Constituents of Concern**
This section should describe in greater detail the type, depth and laboratory analysis that are summarized in Table 2.
7. **Section 4.3: Analytical Parameters/Constituents of Concern**
Due to the known presence of subsurface gas (other than methane) as determined during field visits, the collection and analyzation of subsurface gas should be considered in the FSP.
8. **Section 4.4.2:**
This section describes surface (0-12" bgs) soil sampling and analysis and section 4.4.3 describes subsurface (7-10' bgs) soil sampling, but where is shallow (4' bgs) soil sampling described?
Also, where is QA/QC samples for subsurface and shallow soil sampling described?
9. **Table 2:**
Identify the source of the Target Compound List (TCL) for VOCs and SVOCs, and identify the Target Analyte List (TAL) for metals. Also, define PCs (Pesticides/PCBs?). This information could be included in section 4.3.
10. **Table 2:**
As mentioned previously, clarify how borings will be numbered and why only borings 1 through 10 will have (7-10' bgs) samples collected and analyzed.



Craig A. O'Rourke
Hazardous Materials Specialist

Memorandum

To : Mr. Craig O'Rourke
Department of Toxic Substances Control
Facility Permitting Branch
- 245 W. Broadway, Suite 350
Long Beach, CA 90802-4444

Date: August 27, 1993

File : 90-76

From : JIM ROSS, CHIEF, SITE CLEANUP UNIT
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—LOS ANGELES REGION
101 Centre Plaza Drive, Monterey Park, CA 91754-2156
Telephone: (213) 266-7500

Subject: DRAFT REMOVAL SITE EVALUATION PLAN FOR SITE 6A-NAVAL STATION LONG BEACH-LONG BEACH, CA. (File No. 90-76).

We have received and reviewed the draft site evaluation plan for site 6A at the Naval Station Long Beach, dated August 20, 1993. RWQCB staff also attended a kickoff meeting held at Bechtels offices, in Norwalk, on August 11, 1993. Our comments, based on the above are as follows:

- . This project involves constructing a detour across Site 6A and a portion of Site 6B while a permanent railroad crossing across Site 6A and an overpass on Ocean Boulevard are being constructed. Due to the nature of, and the priority placed on the project by the Navy, it will be acceptable to defer the groundwater investigation and monitoring until the completion of the project. This however, is subject to change if surface/groundwater impact is perceived during the course of the project.
- . Part 1, Section 1.2.2 in the report states that the Gaspur Aquifer is the shallowest potential water-bearing zone beneath the site. Based on current information, we consider the shallow water bearing zone that exists from about 5 to 80 feet to be the shallowest potential water bearing zone.
- . Part 1, Section 7 states that areas with concentrations of constituents of concern that exceed the cleanup goals determined by the risk analysis procedure will be remediated prior to commencing construction. Also, section 6.1.5 states that considerable uncertainty is inherent in the risk assessment process. Groundwater sampling on site, though limited, indicates groundwater contamination. Therefore, the RWQCB continues to view State Water Board Resolution (SWBR) 92-49, the "Policies And Procedures For Investigation And Cleanup And Abatement Of Discharges Under Water Code Section 13304", as being relevant to this site. Included in the SWBR 92-49 and of note are the following:

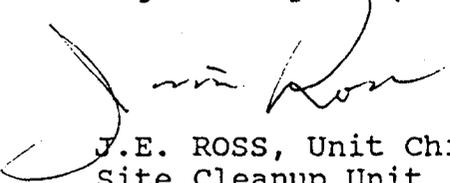
Mr. Craig O'Rourke
Department of Toxic Substances Control
Page 2

.Section III, F-1, where the Water Board shall require actions for cleanup and abatement to "conform to the provisions of Resolution 68-16", the antidegradation policy;

.Section III, G, which ensures "that dischargers are required to clean up and abate the effects of discharges in a manner that promotes attainment of background water quality, or the highest water quality that is reasonable ...".

. Part III, Section 4.3 states that samples collected will be placed on Blue Ice for storage and shipment. We prefer to have the samples stored and chilled on site in wet ice. We do not object to samples being shipped on artificial ice.

If you have any questions regarding this matter, please contact Hugh Marley at (213) 266-7650.



J.E. ROSS, Unit Chief
Site Cleanup Unit