

PROJECT NOTE NO.		PROJECT NO.			
PN-0249/250-39 CLE-C01-01F249/250-I2-0021		01-F249/250-YS			
		N60258.000764			
CONFIRMATION OF:	CONFERENCE X	DATE HELD	19 July 1993		
	TELECOM	DATE ISSUED	29 July 1993		
	OTHER	RECORDED BY	Kathy Brewer/CH2M HILL		
		PLACE	Santa Ana		
SUBJECT	Contract Task Orders (CTOs) Nos. 249/250 Comment Resolution Meeting for Draft Remedial Investigation/Feasibility Study (RI/FS) Work Plans and Sampling and Analysis Plans (SAPs) Naval Complex (NC) Long Beach				
PARTICIPANTS: (* DENOTES PART-TIME ATTENDANCE)					
<table style="width:100%; border: none;"> <tr> <td style="width:50%; border: none;">                 J. Joyce - Code 1832.JJ                  A. Lee - Code 1832.AL                  C. Leadon - Code 1853.CL                  M. Logan - RWQCB                  H. Marley - RWQCB                  A. Ulaszewski - LBNSY                  C. O'Rourke - DTSC                  A. Gutierrez - DTSC                  A. Rege - DTSC*                  J. Christopher - DTSC                  D. Rollefson - NAVSTA Long Beach                  LCDR J. Snyder - NAVSTA Long Beach             </td> <td style="width:50%; border: none;">                 B. Kanter - Port of Long Beach*                  B. Mitchell - Port of Los Angeles*                  P. Tondreault - Port of Los Angeles*                  R. Davidson - Port of Los Angeles*                  K. Habuian - Parsons Brinckerhoff*                  B. Kown - Bechtel Corp.                  K. Kapur - Bechtel Corp.                  J. Friedman - IT Corp*                  K. Brewer - CH2M HILL                  P. Torrey - CH2M HILL                  D. Shelton - CH2M HILL*             </td> </tr> </table>				J. Joyce - Code 1832.JJ A. Lee - Code 1832.AL C. Leadon - Code 1853.CL M. Logan - RWQCB H. Marley - RWQCB A. Ulaszewski - LBNSY C. O'Rourke - DTSC A. Gutierrez - DTSC A. Rege - DTSC* J. Christopher - DTSC D. Rollefson - NAVSTA Long Beach LCDR J. Snyder - NAVSTA Long Beach	B. Kanter - Port of Long Beach* B. Mitchell - Port of Los Angeles* P. Tondreault - Port of Los Angeles* R. Davidson - Port of Los Angeles* K. Habuian - Parsons Brinckerhoff* B. Kown - Bechtel Corp. K. Kapur - Bechtel Corp. J. Friedman - IT Corp* K. Brewer - CH2M HILL P. Torrey - CH2M HILL D. Shelton - CH2M HILL*
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	<p>A comment resolution meeting for the Draft RI/FS Work Plans and SAPs for the Naval Station (NAVSTA) Long Beach and Naval Shipyard Long Beach (LBNSY) was held on 19 July 1993. Also discussed at the meeting was the schedule for the investigation and interim remedial action for Site 6A. The meeting commenced at 0900 hours and concluded at 1500 hours. This project note summarizes the topics discussed.</p> <p><u>General Sampling Issues</u></p> <p>Both the California Department of Toxic Substances Control (DTSC), Region 4, and the Los Angeles Regional Water Quality Control Board (RWQCB) expressed concern regarding the possibility that operating and abandoned oil wells could serve as a conduit for contamination from the shallow water bearing zone to the underlying aquifers. B. Kanter commented that operating oil wells should not present a threat, and that there are strict standards for the abandonment of oil wells. It was suggested that Dennis Sullivan from the Department of Oil and Gas be contacted to get information on oil wells in the area and that a map showing the well locations be included in the Work Plan. K. Brewer said that the Jacobs Team would followup on this.</p> <p>One DTSC reviewer requested that additional consideration be given to existing data in the characterization of ambient levels of metals in groundwater and subsurface soils at the facility, and a subset of the samples collected during the Site Inspection (SI) was suggested as being representative. K. Brewer said that the Jacobs Team would evaluate these metals concentrations and revise the current discussion of background levels in the Work Plan if appropriate. However, no changes are recommended for the background sampling proposed in the Work Plans since all of the samples taken during the SI are from contaminated areas, making it difficult to prove conclusively that the metals concentrations, even in apparently uncontaminated samples, are representative of ambient conditions. In the Work Plans, it is proposed that background subsurface soil and groundwater samples be taken from wells to be</p>				



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installed outside of contaminated areas as part of the sitewide groundwater monitoring program. Therefore, the only additional costs for these samples is the analytical cost. The metals concentrations from the samples taken from these uncontaminated areas will be compared to concentrations from the contaminated areas, and where the samples have metals concentrations that are not significantly different, the set of background samples will be expanded to also include those samples.

Site-Specific Sampling Issues

A general comment received from DTSC involved defining what the next step of the sampling program would be given the outcome of the first phase of sampling. It was agreed that where appropriate, conditional samples would be added to the SAP. Site-specific sampling issues discussed are summarized below.

Site 3. DTSC requested that additional deep well points be installed to determine whether or not there is dense nonaqueous phase liquid (DNAPL) contamination. C. O'Rourke said that DTSC would not be comfortable basing a remedial action decision on only one well point. The Navy will consider adding two more well points. Also, conditional sampling will be added to define the extent of groundwater contamination if the groundwater sampling indicates that contamination has extended beyond the site boundaries. In response to other comments, Site 3 will be included in the underwater survey of the Mole and TPH diesel will be added to the list of analytes for subsurface soil and groundwater.

Site 4. In response to DTSC and RWQCB comments, the Navy will consider defining the area east of the jogging path and north of Alternate Site 1 as an area of concern for subsurface soil and groundwater. C. O'Rourke said that the binomial sampling approach (five samples to define the upper bound of the median concentration in the area) would be acceptable for characterizing this area; analytes should include TPH, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and metals. However, C. Leadon commented that the Navy is uncomfortable in setting a precedent for investigating an area where there has not been a confirmed release.

Site 6A. Conditional well point samples and monitoring wells will be added to define the extent of groundwater contamination if the initial sampling indicates that action levels are exceeded beyond the boundary wells.

Site 7. The RWQCB had recommended that a pore water bioassay be substituted for one of the proposed whole sediment bioassays. K. Brewer said that the use of pore water bioassays had been discussed previously, and one of the problems was the logistics of collecting enough sediment to provide sufficient pore water for the test. B. Kanter said that an elutriate test would be more practical. M. Logan said that she would discuss this with the RWQCB staff and provide the Jacobs Team with the recommended test protocol.

Site 8. H. Marley said that he was not satisfied that the potential for groundwater contamination could be assessed at Site 8 by looking at soils at the fenceline; he would like to see downgradient groundwater sampling. The Navy will consider adding shallow well point sampling downgradient of the fenceline.

Site 12. DTSC is concerned that there may be widespread disposal of sandblast grit in the Lot X and Lot C areas that may impact soils and groundwater. Currently,

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groundwater monitoring at the downgradient boundaries of Lot X is planned to assess the possible impacts of the tributyltin sandblast grit disposal. K. Brewer suggested that the analyte list for samples from those well points could be expanded to include some indicator metals so that impacts from other sandblast grit disposal could be assessed. Also, surface soil samples could be taken from Lot X to assess the potential risks from that pathway. A decision as to whether or not Lot C should be characterized would be based on the data obtained from Lot X. In addition, there are two wells near Lot C, MW-44 and a new well planned for the facilitywide monitoring, that could be sampled for metals. C. O'Rourke said that approach was generally acceptable.

Site 13. H. Marley said that one downgradient well was insufficient to determine whether or not groundwater has been impacted at Site 13. The Navy will consider adding downgradient well points to the SAP.

Site 6A Activities

B. Mitchell, K. Habuian, and R. Davidson presented the Port of Los Angeles plans for the Pier 300 project that will necessitate the construction of a detour road on part of Site 6A. The design is scheduled to be completed in May 1994, with construction beginning in September 1994. The Port of Los Angeles is concerned that Navy cleanup of soils at Site 6A be completed prior to the start of construction.

The characterization and evaluation of remedial alternatives for Site 6A has been accelerated to respond to the Port of Los Angeles schedule. B. Kown presented the schedule for the Removal Site Evaluation (RSE) that Bechtel Corp. will be preparing (attached). The soil sampling to be done for the RSE will include the sampling already planned for the RI/FS. Groundwater will not be addressed in the RSE since it is not expected that potential groundwater contamination in the area will impact the construction project.

The proposed schedule for the RSE has only 7 to 8 days for agency review of the Work Plan and SAP and the RSE Report. J. Christopher suggested that interim meetings be held so that the agencies can be kept informed and decisionmaking can be facilitated. A kickoff meeting for the Site 6A RSE was scheduled for 11 August at Bechtel's office in Norwalk, and a draft Work Plan review meeting was scheduled for 25 August at DTSC Long Beach. After that, a combination of meetings and teleconferences will be conducted every other Wednesday during the course of the RSE investigation and report preparation. The first such meeting will be on 8 September.

It was noted that the monitoring wells proposed in the RI/FS Work Plan for Site 6A may have to be relocated based on the Port of Los Angeles construction. It was agreed that the wells could be relocated as long as the objective of perimeter monitoring was maintained.

C. O'Rourke noted that the analysis of Applicable or Relevant and Appropriate Requirements (ARARs) will not be completed before the RSE remedial action objectives are determined. He stated that the leaching pathway and potential effects of soil contamination on groundwater should be considered in the development of the cleanup objectives.

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Site 6B Preliminary Assessment

C. O'Rourke said that DTSC has not yet reviewed the Site 6B Preliminary Assessment Report. Comments were received from the RWQCB and will be addressed in the Site 6B Work Plan since they involve sampling issues. B. Kown presented the draft schedule for the Site 6B Work Plan and SAP (attached). He emphasized that the schedule has not been finalized.

RI/FS Schedule

Based on Bechtel's working schedule for the RI/FS implementation, a bar chart schedule showing major activities will be included in the Final RI/FS Work Plans. It will be different than, but will not exceed, the Resource Conservation and Recovery Act of 1980 (RCRA) Part B corrective action schedule that is being negotiated.

Screening Risk Assessment

In their comments, DTSC recommended that the screening criteria for soils be modified to include the ingestion, inhalation of volatiles, inhalation of dusts, and dermal contact for both residential and industrial exposures, following the approach that was used by Marine Corps Air Station (MCAS) El Toro. It was agreed that the screening criteria would be modified to provide consistency between the two bases. J. Christopher commented that he would like to see Southwest Division, Naval Facilities Engineering Command (SWDIV) adopt the MCAS El Toro screening criteria on all of their sites.

D. Shelton explained that Environmental Protection Agency (EPA) recently published toxicity factors for the various carcinogenic polynuclear/polycyclic aromatic hydrocarbons (PAHs). Previously, all carcinogenic PAHs were considered to be equitoxic with benzo(a)pyrene. Therefore, the screening criteria based on the EPA toxicity factors will be modified to reflect this change. J. Christopher said that California Environmental Protection Agency (Cal-EPA) has not yet accepted the new toxicity factors, so the screening criteria based on the CAL EPA toxicity factors should still be based on equitoxicity with benzo(a)pyrene.

H. Marley said that the groundwater criteria used in the Work Plan are acceptable at this time. However, the RWQCB will evaluate whether drinking water criteria should be considered when the TDS data are available from the RI.

State ARARs

C. O'Rourke said that the state has not yet evaluated state ARARs specifically for NC Long Beach. A. Lee said that the list of state ARARs provided previously by DTSC will be included in the Final Work Plans with the caveat that the Navy is still evaluating the potential applicability of the requirements.

Nonparticipant Distribution

R. Green - Code 0232	B. Wong - CH2M HILL
K. Reynolds - Code 1841	K. Tomeo - CH2M HILL
D. Villanueva - Code 0232.DV	File - CTO Notebook/PMO
R. Udabe - JEG/Pas	File - PMO
G. Guha - JEG/Pas	File - CH2M HILL
K. Fredrickson - CH2M HILL	

July 19, 1993

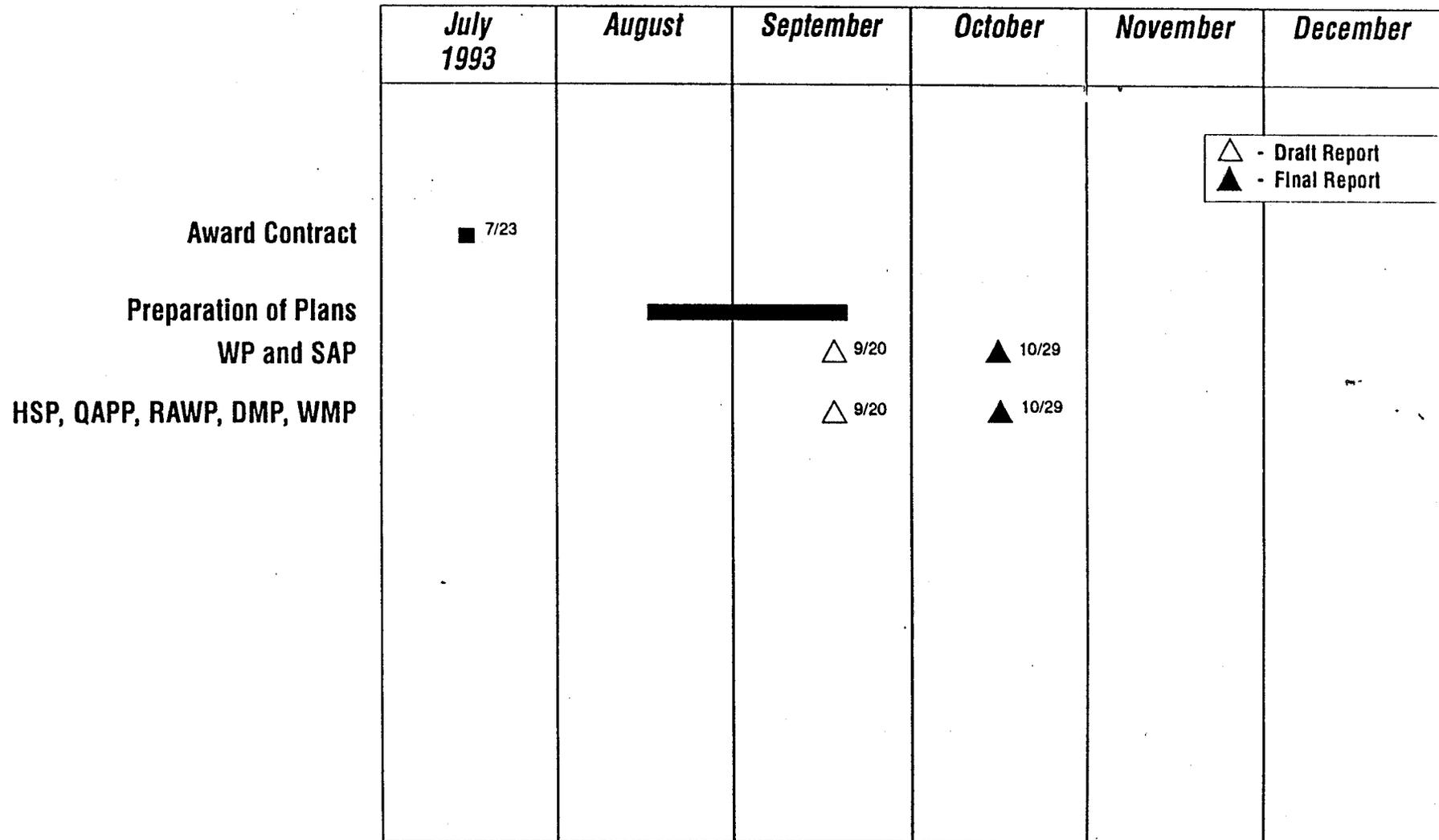
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TOPICS DISCUSSED

ACTION/NOTES

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# CTO #0028: SITE 6B SI WORK PLAN SCHEDULE



# CTO #0027: REMOVAL SITE EVALUATION FOR SITE 6A – SCHEDULE

