

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
145 West Broadway, Suite 425
Long Beach, CA 90802-4444
(310) 590-4868

N60258.000831
NSY LONG BEACH
SSIC #5090.3



July 19, 1995

Captain John Pickering
Commander Long Beach Naval Shipyard
300 Skipjack Road
Long Beach, California 90822-5099

Dear Captain Pickering:

Draft Technical Memorandum No. 2 Remedial Investigation/Feasibility Study (RI/FS) At The Long Beach Naval Shipyard, Long Beach, California

The California Department of Toxic Substances Control (DTSC) has completed its review of the *Draft Technical Memorandum No. 2 RI/FS at the Long Beach Naval Shipyard (Draft Tech. Memo No. 2)*, dated May 1995. The *Draft Tech. Memo No. 2* was prepared for SouthWest Division Naval Facilities Engineering Command by Bechtel National, Inc.

Since the Resource Conservation and Recovery Act schedule date will not be met, DTSC and the Navy have agreed that the *Draft Tech. Memo No. 2* will be submitted as a required deliverable in the meantime. The *Draft Tech. Memo No. 2* presents analytical results from the RI planned sampling phase 1 and proposes conditional sampling based on the findings of the phase 1 investigation. In addition, DTSC received the Installation Restoration Site 11 - Hillside East of Dry Dock 1, Long Beach Naval Shipyard, Removal Action Closeout Report in mid-June 1995 which was after the review of the *Draft Tech. Memo No. 2*. DTSC will need additional time to review the Removal Action Closeout Report in order to make final recommendation on Site 11.

DTSC attended a workshop, which was held at Bechtel on June 5, 1995 to discuss verbal comments from the agencies on this document and found it to be very productive. DTSC has compiled specific comments on this document from its internal technical staff and from the Regional Water Quality Control Board (RWQCB) Los Angeles Region which are enclosed within this letter.

If you have any questions regarding 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
Region 4 Base Closure Unit
Office of Military Facilities



Captain John Pickering
July 19, 1995
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Enclosure

cc: Mr. Albert Arellano Jr., P.E. (R4-4)
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California Regional Water Quality Control Board
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Department of Toxic Substances Control
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Mr. Allen R. Winans (HQ-24)
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P.O. Box 806
Sacramento, California 95812-0806

SPECIFIC COMMENTS

SITE 9

The sampling location HP-9-25 is proposed to be sampled at the shallow and medium depths, without contingency for sampling at the deep depth. To delineate the contamination vertically during this phase of work, it may be necessary to sample at the deep depth.

DTSC recommends that the Navy provide for contingency sampling at the deep depth at HP-9-25.

The sampling location HP-9-29 is listed as a contingency location for all three depths. The sampling location fills a significant gap in the areal coverage. To delineate the contamination horizontally and vertically during this phase of work, it will be necessary to sample at this location.

DTSC recommends that the Navy change the contingent sampling at location HP-9-29 to be required sampling at all three depths.

SITE 10

The existence of semi-volatile organic compounds (SVOCs) in the northeast corner of the site is acknowledged, but the rationale for not delineating the extent of the contamination to the north, northeast and northwest is not provided.

DTSC recommends that the Navy provide explicit rationale for not delineating the extent of SVOC contamination detected at sample location MW-10-03 soil depth 2 to 2.5 feet.

SITE 11

There is no documentation regarding the relocation of sand blast grit at Site 11. The scope of the work performed and drawings should be available for review. Trenches excavated in the flat area adjacent to the disposal area on the slope are not referenced in any way. Evaluation of the field work performed is necessary to judge the adequacy of the investigation of the flat areas.

DTSC recommends that the Navy provide all data generated during the sand blast grit relocation work, including field notes, field logs, trench logs and all analytical data.

The discussion of the decision inputs (Section 4.3.2 and 4.3.3) does not contain the elements discussed later for field work in Section 4.3.7, i.e., sand blast grit sampling and analysis.

DTSC recommends that Section 4.3.2 and 4.3.3 include discussion of the work proposed in Section 4.3.7.

SITE 12

- The discussion of ground water investigation work to be performed in Section 4.4.5.1, Develop a Decision Rule (L-shaped area), should be included in Section 4.4.7.1 which now discusses only the soil investigation work.

DTSC recommends that the Navy include discussion of the ground water investigation in the L-shaped area within Section 4.4.7.1, Step 7, Optimize the Design.

Section 4.4.7.2, Optimize the Design, Southwest Corner, does not list the sampling location numbers as at the sites. Also, sample identification numbers HP-12-22 and HP-12-27 are not listed or shown on Figure 4-10 or Figure 4-11.

DTSC recommends that the Navy include explicit sampling location numbers in the discussion of work to be performed in Section 4.4.7.2. DTSC also recommends that the Navy provide an explanation for omitted sample location identification numbers HP-12-22 and HP-12-27.

Memorandum

To : Mr. Alvaro Guitierrez
Department of Toxic Substances Control
Base Closure Branch
245 W. Broadway, Suite 350
Long Beach, CA 90802-4444

Date: July 5, 1995
File : 90-76

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

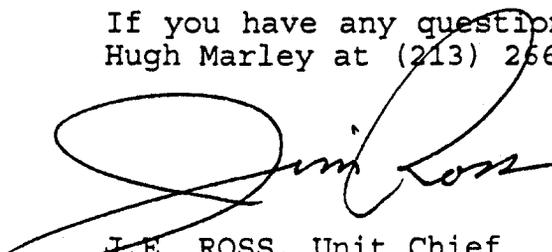
Subject: DRAFT TECHNICAL MEMORANDUM #2, REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RIFS), LONG BEACH NAVAL SHIPYARD, LONG BEACH (File No. 90-75)

We have received and reviewed the Draft Technical Memorandum #2 for the Long Beach Naval Shipyard (LBNSY), dated May 1995. Our comments are as follows:

Section 2.3.2 states that the groundwater at the LBNSY is nonpotable and selects screening criteria accordingly. We believe this to be inappropriate at the present time as ARARs for the LBNSY have not been selected. Please note this Regional Boards Basin Plan, formally adopted on June 13, 1994, includes Terminal Island. Referenced in the Basin Plan is State Water Resources Control Board (SWRCB) Resolution 88-63, the "Sources of Drinking Water Policy", which states that, except under specifically defined circumstances, all ground and surface waters of the state are to be protected as existing or potential sources of municipal and domestic supply. Also referenced as part of the Basin Plan is SWRCB Resolution 68-16, the Statement of Policy with Respect to Maintaining High Quality of Waters in California. Since groundwater cleanup standards may be based, in part, on the above referenced documents and policies, organic chemicals in groundwater must be screened down to approved laboratory method detection limits (MDL). In addition, please refer to our June 1, 1993 comments on the RIFS Draft SAP, and our July 5, 1994 comments on the Proposed Screening Criteria for Soil and Groundwater.

- . Include isoconcentration (plume) maps of all organic chemical compounds detected in the groundwater above the MDL.
- . Section 3.1 states that no chemicals of potential concern (COPCs) were detected at Site 8. However, all soil and groundwater samples were collected upgradient of the TCE disposal site. We will require that soil and groundwater sampling be conducted downgradient of the TCE disposal site. The Navy may propose that no further action be taken for Site 8 based on the results of the downgradient sampling.
- . The metals nickel, arsenic, and thallium are present at levels above the statistical background. Please include isoconcentration maps for the above referenced metals.
- . We will require that monitoring wells be proposed and installed downgradient of the groundwater contaminant plumes identified during this investigation.
- . Please add the groundwater flow direction to the figures included in this document, wherever appropriate.
- . Please clarify whether the CPT points were used to generate groundwater contours for this report. Only surveyed monitoring wells and piezometers may be used to determine the flow direction and gradient.
- . All decision trees in this document must include a decision point requiring review under ARARs prior to deciding whether a FS is required. All further action decisions are currently, and inappropriately, based on human health risk assessment only.
- . Please change "MCLs" to MDLs" in all decision trees (see the first bullet above).

If you have any questions regarding this matter, please contact Hugh Marley at (213) 266-7669.



J.E. ROSS, Unit Chief
Site Cleanup Unit