

STATE OF CALIFORNIA - ENVIRONMENTAL PROTECTION AGENCY

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
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April 9, 1997

Ms. Anna Ulaszewski
Long Beach Naval Shipyard
Code 1171au
300 Skipjack Road
Long Beach, CA 90822-5000TO: Kim Ostrowski
619-558-0248FROM: ALVARO
Gutierrez
562-590-5565**DRAFT GROUNDWATER INVESTIGATION WORKPLAN (SUPPLEMENT TO THE RI FOR
LONG BEACH NAVAL SHIPYARD) FOR IRP SITES 9, 12, AND 13 AT THE LONG
BEACH NAVAL SHIPYARD, LONG BEACH, CALIFORNIA (FILE NO. 90-75)**

We have received and reviewed the Navy's Draft Groundwater Investigation Workplan for IRP Sites 9, 12, and 13, at the Long Beach Naval Shipyard, dated February, 1997. Our comments are as follows:

- . The screening criteria described in Section 2.2.2.2 should be based on the beneficial use of the groundwater. If the investigation determines that the groundwater flow direction in the lower aquifer is towards the Harbor, then the California Ocean Plan criteria would be appropriate. However, if the groundwater is recharging the West Coast Basin, drinking water MCLs would apply. We understand that the appropriate screening criteria can not be determined until the proposed monitoring wells are installed. Therefore, as an interim measure, during the initial portion of the investigation into the lower aquifer, the Navy should consider adopting whichever screening criteria is more stringent for the chemicals of concern.
- . Figure 3-8 indicates that the base of the benzene contamination at SP-9-04 is not defined. In order to rule out the SP-9-04 area as a source for the benzene in the lower aquifer, we will require that the vertical extent of the shallow benzene contamination be defined, and a "clean zone" below the plume is identified.
- . The groundwater around the recently excavated USTs north of building 128 and 129 is known to be contaminated. Groundwater characterization at these two sites were deferred, at the Navy's request, to this investigation. Please indicate which proposed soil gas samples, Hydropunch-type samples or groundwater monitoring wells, if any, will address these former UST sites. Also, indicate the status of the 1,000 gallon paint waste UST at Building 216, and whether the contamination being linked to it is being addressed.

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- . Please indicate whether the solvent sump behind Building 129 is being investigated as a source for the shallow groundwater contamination. Include soil gas sampling points in the vicinity of the sump and soil sampling directly below the sump.
- . Indicate the number, or percentage, of samples that will be sent to the off-site laboratory for confirmatory analysis. Also, please notify us as to when the mobile laboratories will be on site.
- . Section 4.1.1.5 states that a condition for limiting the VOC investigation to the upper interval is if a vertical gradient is not present. We believe that the decision should also be based on whether VOCs are present at the base of the upper interval, on the existence of a vertical gradient between the upper and lower water bearing units, and whether a significant source exists, or existed.

If you have any questions or comments regarding the above, please contact Hugh Marley at (213) 266-7669.



J.E. ROSS, Unit Chief
Site Cleanup Unit

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