



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

N60258.001026
NSY LONG BEACH
SSIC NO. 5090.3

August 31, 1998

Mr. Kurt Baer
Project Manager
Southwest Division
Naval Facilities Engineering Command
1420 Kettner Boulevard, Suite 507
San Diego, CA. 92101-2404

**RE: COMMENTS ON THE DRAFT SAMPLING REPORT FOR NINE GROUP B AOCs,
LONG BEACH NAVAL COMPLEX, LONG BEACH, CA.**

Dear Mr. Baer:

The United States Environmental Protection Agency (USEPA) has received and reviewed the above noted document. We are providing you our comments.

We thank you for the opportunity to review this document and look forward to completing the project in a timely manner. If you have any further questions please feel free to contact me at (415) 744-2388.

Sincerely,

A handwritten signature in cursive script, which appears to read "Martin M. Hausladen". The signature is written in black ink and is followed by a long horizontal line.

Martin M. Hausladen, RPM

**COMMENTS ON THE
DRAFT SAMPLING REPORT FOR
NINE GROUP B AREAS OF CONCERN
LONG BEACH NAVAL SHIPYARD**

GENERAL COMMENTS

1. The lengthy quotation in **Section 1.3.3, Environmental Setting**, is the weak part of this document. This section should be carefully edited if this quotation will be used in future documents. A few specific comments are provided.
2. The figures showing summaries of the sampling results with highlighted contaminants that are above the screening criteria are well done and most helpful.

SPECIFIC COMMENTS

1. **Section 1.3.2, p. 1-4, paragraph 1.** Better wording of the sixth line would be: therefore, the entire LBNSY is constructed on man-made fill.
2. **Section 1.3.3.1, p. 1-4, paragraph 2.** Please change "higher evaluations" to "higher elevations".
3. **Section 1.3.3.2, p. 1-5, paragraph 4.** Please clarify whether the last sentence refers to the upper two sand members or one of the other "three to four separate sand to gravely sand zones".
4. **Section 1.3.3.2, p. 1-6, paragraph 2.** The second line should read "fault scarps" rather than "fault scraps".
5. **Section 1.3.3.2, p. 1-7, paragraph 1.** If the water injection system is still active, please change "controlled further subsidence" to "controls further subsidence".
6. **Section 1.3.3.4, p. 1-8, paragraph 4.** Please state whether the poor quality of the Gaspur aquifer is due to contamination or salt water intrusion.
7. **Section 1.4, p. 1-12.** Since the purpose of this investigation is to determine if these facilities are suitable for release for reuse by a third party, more attention should be given to evaluating hazards for the most likely future land use.
8. **Section 1.4.2, p. 1-14, paragraph 4.** It is unclear whether the second to last sentence should read "salt water *for* cooling of onboard ship activities."
9. **Section 3.3.2, p. 3-5, paragraph 2.** Please reference Figure 3-3 and state that the plume is being investigated under separate contract.
10. **Section 4.2, p. 4-3, paragraph 2.** Please remove the parentheses around the second sentence.

11. **Section 5.1.1, p. 5-3, paragraph 3.** Please delete the second "April 1993".
12. **Figure 5-1, p. 5-5.** The left side of this figure is very difficult to read.
13. **Section 8.0, p. 8-1, paragraph 2.** Please provide the additional information found on pages 5 and 6 of the Work Plan Addendum No. 1 that the building was modified after 1980 for breakdown and storage of asbestos waste and that the building was cleaned and closed. Please include the regulations and/or procedures followed for this cleaning and closure.
14. **Section 11.1, p. 11-2, paragraph 6.** Please provide the basis for concluding that soil and groundwater were not impacted by the 100-gallon fuel oil tank spill.
15. **Section 12.0, p. 12-1, paragraph 4.** Please state the objectives and matrix being investigated in the area south of Building 128.
16. **Section 12.0, p. 12-2, paragraph 1.** Since the only soil sample taken showed mercury below background and was seven feet above the water table, additional soil sampling should be performed beneath the hole in the storm drain located east of Building 132. Soil samples should also be taken in conjunction with the additional groundwater samples. In addition to industrial sources of mercury, please clarify whether any records of mercury releases from failed pump seals or other equipment have been discovered.
17. **Section 12.0, p. 12-3, paragraphs 1 and 2.** The sediment in both drydocks should be removed. There is no assurance that the sealed tunnels would not be reopened. The fifth line of first paragraph should refer to Drydock 2.
18. **Section 12.0, p. 12-3, paragraph 4.** Please edit this paragraph to reflect that a single groundwater sample was collected at HIST 3.
19. **Appendix I, p. I-3, paragraph 6.** The first sentence should read "No data were rejected."