



DEPARTMENT OF THE NAVY
NAVAL TRAINING STATION
SAN DIEGO, CALIFORNIA 92133-1000

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NTC SAN DIEGO
SSIC #5090.3
IN REPLY REFER TO:

5090
17/0354
04 APR 1991

From: Commanding Officer, Naval Training Station, San Diego
To: Commanding Officer, Southwest Division, Naval Facilities
Engineering Command

Subj: SOLID WASTE WATER QUALITY ASSESSMENT TEST AND SITE INSPECTION
WORKPLAN

Ref: (a) NAVTRASTA San Diego ltr 5090 Ser 17/0072 of 24 Jan 91

Encl: (1) California Department of Health Services ltr of 1 Mar 91

1. Reference (a) requested review and approval on the subject workplan. Enclosure (1) provides the requested review comments and approval from the State of California Department of Health Services.
2. Enclosure (1) is forwarded for your information and appropriate action.


P. N. JOHNSON

Copy to:
CNTECHTRA
NTC San Diego
SWNAVFAC (Code 09PY)

**DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM**

REGION 4

WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802
(213) 590-4868

March 1, 1991

P.N. Johnson
Commanding Officer
Department of the Navy
Naval Training Station
San Diego, CA 92133-1000

Dear Capt. Johnson:

REFERENCE: 5090-17/0069

The Department of Health Services/Toxic Substances Control Program (Department) has received and reviewed the document entitled "Naval Training Center, Solid Waste Water Quality Assessment Test and Site Inspection Workplan" dated January 14, 1991 prepared by Jacobs Engineering Group Inc. in association with International Technology Corporation, CH2mhill, and Grigsby/Graves.

We feel that the document is well prepared and contains all the essential technical elements of a SWAT and Site Inspection work plan. However, we have a few concerns that the Navy should address. We feel that the Navy should reconsider the proposed new NMI alignment which runs through the MCRD disposal area. The City of San Diego should consider an alternative route for the waste water line; since the area proposed contains hazardous materials.

Enclosed please find our comments and recommendations on the subject document. The Department technical and support services branch is reviewing the proposed monitoring/sampling, and the proposed sampling procedure, we will forward any comments they have on these sections as soon as we get them. Please call me at (213) 590-4909 if you would like to discuss these comments.

Sincerely,

A handwritten signature in cursive script that reads "Emad Yemut".

Emad Yemut
Waste Management Engineer
Site Mitigation Branch

Enclosure

cc: Mr. John Anderson
San Diego RWQCB
9771 Clairemont Mesa Blvd., Suite B
San Diego, CA 92124

ENC (1)

Comments on Naval Training Center
SWAT and Site Inspection Work Plan
Marine Corps Recruit Depot (MCRD) Disposal Area

Section 2.9.1 Land Use within one half mile of MCRD Disposal Area

The Department feels that the Navy should reconsider the proposed new NM1 alignment which runs through the MCRD Disposal area. The City of San Diego should consider an alternative route for the wastewater line, since the area proposed contains Hazardous Materials, if any excavation is to occur, the excavated materials should be disposed of properly in accordance with local, State and Federal regulations.

The old sewer line should be capped from both ends, so that the lateral mobility of contaminants is contained.

Section 3.8 Site-Specific Geology and hydrology
page 3-33

It is stated that the levels of chromium and lead listed in table 3.3 page 3-37 are slightly above background levels. What is the location of the background samples and the levels of these samples both in Soil and Groundwater.

Section 4.0 Proposed Geophysical Survey

The three geophysical survey & techniques used by the navy are well selected; however, our recommendations are as follows:

1. the magnetic surveys should be conducted with a proton precession magnetometer (field magnetometer) capable of measuring the earth's total magnetic field to an accuracy of 0.1 gamma, such as the Geometrics G-855 or the EDs Omni IV. Base readings should be monitored continuously with a similar instrument.
2. an Electromagnetic survey (EM-31) should be used to delineate any anomalous areas found in the magnetic survey. Anomalous areas should be logged and evaluated with one or more of the other survey methods.
3. The GPR survey method has limited penetration and is effected by wet soil, it could be used mainly in clearing borings and monitoring well locations as well as in defining the subsurface dimensions of any shallow obstacle.

Section 5.1 Proposed Surface water Sampling and Rationale

The Department feels that there is a good possibility that contaminants from the MCRD Disposal area leached to the surface water of the boat channel; therefore, samples should be taken from these areas and checked against background samples taken from the middle of the Bay.

Section 5.2. Vadose Zone Sampling

It should be noted that sampling of the Capillary Fringe area is important.

Section 5.3 Proposed Soil Sampling and Rationale

Since the groundwater table level exists within approximately 7 feet of ground surface at the MCRD Disposal area and in the immediate vicinity; the Department feels that sampling depth intervals taken at the surface, 2.5-, 5-, 7.5-, 10-, 20-, 30. should give better results.

Section 5.3.2 Background Soil Sampling

The Department feels that taking two background soil samples is more appropriate and that those samples should be analyzed for the same contaminants of concern.

Section 5.4.2 Monitoring Well Design

A sieve analysis should be conducted so that the proper sand size could be matched to the aquifer and a filter sandpack properly selected.

Section 5.4.5 Proposed Analytical Methods and Rationale

Based on the site history, various kind of hazardous waste, industrial waste and infectious waste were disposed of at the MCRD disposal area.

The Department feels that the navy should test for PNA's and Dioxins when high concentration of contaminations are present in the samples.

Furthermore, we recommend that testing for Hepatitis B in groundwater samples should be conducted since seepage of contaminations to bay area is suspected, and the bay area is considered a potential pathway for human exposure.

Section 6.3.1 Borehole Sample Collection

The use of electrical tape to seal the rings is not a recommended procedure, it is more appropriate to use NO-adhesive tape such as (Teflon, Polyethylene, Para Flem) so that cross-contamination could be prevented.

Detailed procedures for decontamination of drilling and sampling equipment should be provided.

Section 6.3.2 Groundwater Sample Collection

Sample withdrawal and Preparation; During the first round of well water analysis for metal, you should analyze both filtered and unfiltered well water.

General Comments

Health and Safety Plan (HSP)

The HSP is well organized and reflects a sound approach to health and safety for RI/FS Work. However, the following items remain to be addressed:

Sanitation

The plan shall describe the sanitation facilities available for the site personnel in adherence to 29 CFR requirements items such as adequately stocked washing facilities and showers, toilets, portable water, etc., should be considered.

Recordkeeping

Must be included as a section of the HSP in adherence to 29 CFR requirements.