



DEPARTMENT OF THE NAVY
NAVAL TRAINING CENTER
SAN DIEGO, CALIFORNIA 92133

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IN REPLY

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15 OCT 1991

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

Subj: REVIEW COMMENTS FOR DRAFT SOLID WASTE WATER QUALITY ASSESSMENT
TEST (SWAT) REPORT FOR MCRD DISPOSAL AREA

Ref: (a) Draft Solid Waste Water Quality Assessment Test (SWAT)
report for MCRD Disposal Area of 31 Jul 91
(b) Meeting between Martha Gandy (NTC)/Michael Pound (SWEFD) of
12 Sep 91
(c) United States Fish and Wildlife (USFW) ltr of 8 Apr 91
(d) Technical Guidance Manual, Solid Waste Water Quality
Assessment Test (SWAT) Proposals and Reports - State Water
Resources Control Board of Aug 88

1. Draft comments for reference (a) were discussed in reference (b).
Our final revised comments are as follows:

a. P. ES-1, first paragraph: Insert word "California" in front
of "least tern" to designate species of the endangered bird.

b. P. ES-1, second paragraph: On the third line, in item (2),
the words "monitoring wells" are stated twice.

c. P. 1-1, section 1.0: Mention that the U. S. Fish and
Wildlife comments were also incorporated into the addendum to the
SWAT proposal as requested in reference (c).

d. P. 3-1, section 3.2: Delete the last sentence of the first
paragraph. Demolition debris was stored for a short time and has
been removed from the base.

e. P. 3-5, section 3.4: The last paragraph on the page needs to
be revised as soil borings for a site assessment were recently done
at the building 227 site by IT Corporation.

f. P. 4-8, section 4.8: A copy of the well abandonment permit
should be included in the report.

g. P. 7-15: In table 7.4 and throughout the report in other
tables, a "contract required detection limit" is referred to. These
limits are not clear in the report and this terminology needs to be
explained or deleted.

h. P. 8.7, section 8.5: Modify the end of the second sentence
in this paragraph to say that "leakage may be occurring".

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i. P. 9-1, section 9.1: This section seems to recommend only one or two more rounds of groundwater sampling, however, appendix 2, section A of reference (d) states that water quality sampling and analysis should be conducted quarterly for one year. Verify what is required and modify this section as appropriate.

j. P. 9-2, section 9.3: Disagree with the recommendation to cover the least tern nesting area with clean fill. Sample analyses do not appear to indicate contamination heavy enough to cause harm to the least tern. The U. S. Fish and Wildlife Service (USFWS) will review reference (a) and should indicate otherwise per reference (c).

k. P. 9-2, section 9.3: Additional information needs to be included in this section as future land use should be discussed in greater detail. The boundaries within the landfill area were not characterized, only the perimeter. Therefore, it seems that land use, i.e., construction, should be prohibited without more extensive study. The area outside of the landfill boundaries would be more feasible for construction. The report should recommend procedures for investigation in the vicinity of the landfill for future construction use.

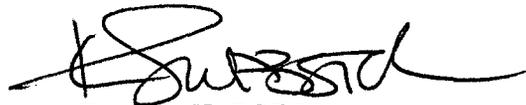
l. The report should discuss the risks associated with present land use. Receptors include NTC personnel involved with physical training exercises in the area.

m. This SWAT/SI report should state that the report will be submitted to the state and local Department of Health Services, EPA Region IX, and the USFWS as well as the Regional Water Quality Control Board (RWQCB).

2. Request you ensure that reference (a) meets all requirements of reference (d).

3. For future rounds of sampling, please ensure that the contractor complies with application regulations for proper identification storage and disposal of hazardous waste. In particular, drums should be marked correctly and promptly removed from Naval Training Center.

4. Naval Training Center point of contact is Ms. Martha Gandy, Environmental Engineer, at 524-1022.



K. S. WEBSTER
Chief of Staff