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**IN REPLY REFERENCE:** CTO-0064/0211

May 29, 1996

Commanding Officer  
Naval Facilities Engineering Command  
Southwest Division  
Mr. Paul Kennedy, Code 0233  
Building 128  
1220 Pacific Highway  
San Diego, CA 92132-5187

**Subject:** Responses to Agency Comments on Technical Memorandum No. 4: Report on Second Phase Extended Site Assessment (ESA) for the Navy Exchange (NEX) Gas Station, Naval Training Center (NTC), San Diego [CTO-0064]

Dear Mr. Kennedy:

Enclosed is our submittal of responses to agency comments on Technical Memorandum No. 4: Report on Second Phase Extended Site Assessment for the Navy Exchange (NEX) Gas Station, Naval Training Center (NTC), San Diego. Four copies of the responses to comments and enclosures are submitted for distribution within SWDIV. The appropriate number of copies have also been submitted to NTC and regulatory agency personnel, and for inclusion in the NTC administrative record and information repositories. These responses to comments and enclosures, once attached, finalize the Technical Memorandum No. 4 document dated January 1996.

If further information is required, please contact me at (619) 687-8795 or M'balia Tagoe at (619) 687-8779.

Very truly yours,



Jerald F. Bailey  
Project Manager



**RESPONSES TO AGENCY COMMENTS ON TECHNICAL MEMORANDUM NO. 4  
REPORT ON SECOND PHASE EXTENDED SITE ASSESSMENT (ESA)  
FOR THE NAVY EXCHANGE (NEX) GAS STATION  
NAVAL TRAINING CENTER (NTC), SAN DIEGO, CALIFORNIA**

*Originator: Laurie Apecechea, DEH SAM*

*Date: 25 March 1996*

**Comment 1.** The cross-sectional map for A-A' shows the location of utilities while the other cross-sectional maps do not. Does this mean there are no utilities in these other cross areas of the site?

**Comment 2.** The E-E' cross sectional map does not correspond to the plan view of the dissolved-phase benzene plotted on Figure 4-1. Which map has the correct interpretation?

**Comment 3.** Figure 3-8 and 3-9 are labeled as Extent of Vadose Zone Contamination at 11 and 16 feet respectively. According to the boring logs provided these locations would be in the Saturated Zone. Are these figures correctly labeled?

**Comment 4.** In Appendix G, the Semivolatile Organics Analysis Data Sheet for Sample No. 064MW6508 shows an X in the third column. What does this X stand for?

**Response 1.** No, it does not. An attempt has been made to include utilities identified during the geophysical survey on the other geologic cross-sections. Revised cross-sections are provided as attachments to these responses to comments.

**Response 2.** The geologic cross-sections included as Figures 3-2 and 3-3 only presented vadose and saturated soil zones impacted with hydrocarbon. Figure 4-1 presents the hydrocarbon impacted areas in groundwater.

**Response 3.** Comment acknowledged. Based on our data, soil samples collected at 11 feet bgs were within the vadose zone, while the samples collected at 16 feet bgs were within the saturated zone for most locations. Figures 3-9 and 3-10 have been relabeled as "Interpreted Contours Showing Extent of Saturated Zone Soil Contamination at 16 ft" and are attached.

**Response 4.** The qualifier "X" identifies results from hydrocarbons quantitated in a given volatility range, that do not match the pattern of the specified product. The laboratory Case Narrative for this SDG data package is attached.

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**Comment 5.** The values obtained in the fuel fingerprinting data are different than the values listed on the maps showing TPH data. Why were these values not listed on the TPH figure maps?

**Response 5.** Data presented on the TPH maps are the results of the analysis of samples using the CA-LUFT method. Fuel fingerprinting analysis was only conducted on a small subset of the total wells on site using EPA Method 8015.

**Comment 6.** NOTE: Chromatographs show what appears to be matrix interference in samples for MW-4 and MW-8 for diesel.

**Response 6.** Comment noted.

**Comment 7.** In Appendix G, fuel fingerprinting sample K9504849-001 report, pages 00228 and 00234 shows a compound between Time = 13 through Time = 20. However, the Semivolatile Organics Analysis Data Sheet, page 00005, states ND for Mineral Spirits, Jet Fuel, Kerosene and Diesel. What is the tentative identification of the compound found at this time interval?

**Response 7.** The spike shown between RT 13 and 20 represents the surrogate.

**Comment 8.** In Appendix G, page 00263, the sample is listed as DCM. What does DCM stand for?

**Response 8.** DCM stands for dichloromethane (a.k.a., methylene chloride).

**Comment 9.** In Appendix G, page 00044, the data for sample No. 064MW7308 is the same as the data on page 00018. The only difference between the two pages is the SDG ID numbers which are different. Please clarify why these two sample numbers have different SDG ID numbers.

**Response 9.** Sample 064MW7308 was batched in SDG No. K(950)5087. However this sample was also used to run QC analyses (matrix spike and matrix spike duplicate) for the SDG No. K(950)5050 batch of samples, requiring that the sample data sheet be included with that SDG.

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**Comment 10.** In Appendix F & H, please provide a Chromatogram index similar to that provided in Appendix G.

**Response 10.** Because a chromatogram review was necessary to fully evaluate the results of the fuel fingerprinting analyses, Level D data packages, which include raw data, were requested from the laboratory. For all other samples, only Level C data packages were planned, were requested, and are now available.

**Comment 11.** The values of TPH-gasoline between Table 3-4 and 3-6 are very different especially for MW2, MW4 & MW8. Can you explain these differences?

**Response 11.** An explanation of the discrepancy between these results, due primarily to differences in the analytical methods used, is provided in Section 3.3.3

**Comment 12.** In Appendix F, several data sheets do not indicate the date the sample was received. It is not clear if these samples were analyzed within the proper holding time.

**Response 12.** A review of the data sheets provided in Appendix F only identified one environmental sample (064WS3701) for which the date of receipt was not indicated. This sample was received by the laboratory on 8-5-95. The corrected laboratory data sheet for this sample is attached. All other data sheets in Appendix F with no sample receipt dates are for laboratory blanks for which this information is not applicable.

**Comment 13.** Please provide information from Columbia Analytical laboratory regarding their QA/QC protocol for EPA Methods 8015, 8020, and 504. See Section 3, page 28, item 5 of the 1996 SAM Manual. The SAM library does not have this information for Columbia Analytical laboratory. The soil percent (%) recovery QC limits appear to be very low for EPA Method 8020, (49-125).

**Response 13.** This information is provided as an attachment to these responses to comments.