



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

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NTC SAN DIEGO  
SSIC NO. 5090.3.A  
IN REPLY REFER TO:

5090  
010/ **0966**  
**11 OCT 1991**

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

Subj: COMMENTS FOR NAVY EXCHANGE GAS STATION DRAFT SITE  
INSPECTION REPORT (CTO #0137)

Ref: (a) Navy Exchange Gas Station Draft Site Inspection Report  
(b) Meeting between Martha Gandy (NTC)/Michael Pound (SWEFD) of  
12 Sep 91

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

a. p. 2-1: The sump is not pumped out monthly as stated in the report. The report should state that the sump is pumped out "periodically" or words to this effect.

b. p. 2-5: The last two sentences of the first paragraph should state, "It was subsequently determined that two locations of vapor recovery line and a gauge on the diesel tank were the probable cause of the test failures. Repairs were made and pressure tests on the vapor recovery system passed."

c. p. 2-5: Results of the tracer test are available and need to be incorporated into the report.

d. p. 2-9: More history concerning the Chevron site must be discussed. Include what activities concerning remediation are still occurring on the site.

e. p. 4-5: Display and explain the direction of the hydraulic gradient.

f. p. 5.1: State in the last sentence on this page that the gasoline was detected at very low levels.

g. p. 5-9: Explain in greater detail the procedures and methodology for laboratory dilution of groundwater sample MW-4.

h. p. 6-1: Section 6.1 - Discuss the potential for other commercial gasoline stations, in addition to Chevron, that may have contributed to contamination.

i. p. 6-2: This section needs work. Stoddard solvent is the major contamination constituent found in the investigation. Although we agree with the recommendation in section 7.1.2 that a comprehensive historical review should be conducted in the Remedial Investigation Feasibility Study (RI/FS), a more thorough history of the use of the solvent at the NEX Gas Station must be discussed in

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this section. Stoddard solvent is not certain to have been disposed of on site, therefore, the report should discuss at minimum that stoddard solvent is not currently disposed of on site.

j. The report should briefly discuss how laboratory analytical methods are exact enough to distinguish between stoddard solvent and other potential contamination constituents.

k. p. 7-1: In the historical research section, the first sentence should be rewritten to state, "This task includes reviewing inventory reconciliation records for the USTs at the Navy Exchange Gas Station."

l. p.7-1: This section needs to state the site is recommended for RI/FS. The "Phase I" and "Phase II" terminology used in the report is confusing by itself.

m. p. 7-3: In the historical review section, past practices at other local gas stations in addition to Chevron, including Mobil on Rosecrans Street, should be studied if there is any potential for contribution to contamination.

2. Because of the heavy chemical contamination found on site, the "free product" portion of the contamination should be removed by pumping as soon as possible. Request you initiate this action immediately as recommended in section 7.1 of reference (a).

3. Request you ensure these comments are incorporated into the final version of reference (a). Naval Training Center San Diego point of contact is Ms. Martha Gandy, Environmental Enginner, at 524-1022.



K. S. WEBSTER  
Chief of Staff

Copy to:  
OIC, NEX, NTC San Diego