



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

AR_N00247_000153
NTC SAN DIEGO
SSIC NO. 5090.3.A
IN REPLY REFER TO:

5090
010/1017
22 MAY 1992

From: Commander, Naval ~~Training Center~~, San Diego
To: Commanding Officer, Southwest Division, Naval Facilities
Engineering Command (Code 182)

Subj: SITE INSPECTION REPORT FOR THE NAVY EXCHANGE GAS STATION

Ref: (a) NTC San Diego ltr 5090 010/0637 of 28 Feb 92

Encl: (1) CA Department of Toxic Substances Control (DTSC) ltr of
30 Mar 92

1. Reference (a) requested review of the subject report. Enclosure (1) provides review comments from the California Department of Toxic Substances Control.
2. Enclosure (1) is forwarded for your information and appropriate action.

J. C. Veseleak
J. C. VESELENAK
By direction

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4

220 West Broadway, Suite 350
San Diego, CA 90802-4444

March 30, 1992

K. S. Webster, Capt., U.S. Navy
Chief of Staff
Department of the Navy
Naval Training Center
San Diego, California 92133-1000

Dear Capt. Webster:

DRAFT SITE INSPECTION REPORT FOR NAVY EXCHANGE GAS STATION, NAVAL TRAINING CENTER (NTC) (REF. NO. 5090 010/0440).

The Department of Toxic Substances Control (Department) has completed the review of the subject document. This document is a draft prepared by Jacobs Engineering Group Inc., under contract to the Comprehensive Long-Term Environmental Action Navy (CLEAN).

We feel that the recommendation for additional activities at the Navy Exchange Gas Station is appropriate. We believe that the two phases approach proposed the navy is adequate; however, a Quality Assurance/Quality Control plan should be prepared and followed so that reliable data could be acquired and used to assess the site. The data provided in this report could only be used qualitatively. In order for data to be used in a Baseline Risk Assessment during the Remedial Investigation phase, it should be level III or better.

Enclosed is the Department's comments on the subject document. If you have any questions or would like to discuss these comments, please contact me at (310) 590-4915.

Sincerely,

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

Emad Yemut
Remedial Project Manager
Site Mitigation Branch

Enclosure

cc: See Next Page



K. S. Webster, Capt., U.S. Navy
March 30, 1992
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cc: San Diego, Regional Quality
Control Board
9771 Clairemont Mesa Blvd., Suite B
San Diego, CA 92124

Specific Comments

1. Section 2.2 Status of Former Chevron Gas Station
page 2-6

The text states that "All product present in the groundwater wells at the site has been removed".

The text should be adjusted to provide more information on the type of product present in the groundwater, and in what phase is this product present in the groundwater, floating or dissolved phase. The type of wells should also be specified, are they monitoring wells or extraction wells.

2. Section 2.2 Status of Former Chevron Gas Station
page 2-6

The text states "Since a non-beneficial eye aquifer underlies this area, no groundwater remediation is required".

It's premature to state that no groundwater remediation is required. Groundwater at NTC is at about 7 to 11 feet, and the flow directions is generally toward the estuary, and the bay front areas. This statement should be based on a risk assessment that study the impact of the contaminated groundwater on these bodies of water.

3. Section 3.2 Drilling
page 3-2

The text states "soil samples were collected at 2-foot intervals using a split-spoon sampler for purposes of geologic logging".

Continuous coring of soil boring to determine the exact lithology and therefore hydrogeologic characteristics of the site is more appropriate.

4. Section 3.3 Monitoring Well Installation
page 3-2

The text states that " Number 30 Monterey silica sand was used as a filter pack and was paved slowly ..."

The design of a filter pack is a function of the aquifer which it must control. The filter pack is the interface with the aquifer and is the primary or principle hydraulic

Specific Comments

Page 2

structure in the well. A representative sample of the lithologic section to be screened in each monitoring well should be subjected to a grain size analysis for the purpose of determining the proper screen slot and the proper filter pack gradation.

5. Section 3.3.1 Well Development
page 3-5

Mechanical surging using a surge block is applicable to all sizes of groundwater installations. However, a vented rather than solid surge block should be used because they subject the well screen to less stress during development, which is important for wells constructed of plastic materials (PVC, Teflon).

6. Table 3.1, 3.2, 3.3, 3.4 Parameters Recorded During Well Development
pages 3-7, 9, 11, 13

To avoid compromising the integrity or validity of developed to the point where they produce water that has a total sediment content less of than five ppm and a turbidity of less than five NTU.

7. Section 3.5.2 Groundwater Samples
page 3-21

The procedure taken to collect a groundwater sample where a nonaqueous phase layer was encountered should be included.

8. Section 6.3 Overall Assessment of Data for this case
page 6-8

The text states "Although omissions in the execution of QA/QC methodology were made in the analytical process, it is appropriate to judge the data acquired for this SI of an acceptable quality".

We feel that the accuracy of the information depends upon the Quality Assurance/Quality Control (QA/QC) plans that have been used. This assures that the most reliable data possible are used to make site mitigation decisions. The data acquired during the SI can not be used in the Remedial Investigation phase of the project because no proper QA/QC was developed and followed.