

**COMMENTS ON GROUP A POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
CTO-0082**

Comments from Claire Trombadore

**Group A POIs
Naval Training Center, San Diego**

Claire Trombadore
United States Environmental Protection Agency

Received: 5 July 1995

Comment 1. Section 1. Please briefly describe the overall POI program. Report notes that 57 POIs were identified as needing further study and divided into Groups A-C. How were the 57 POIs assigned to Groups A-C, chronological order for those in the preliminary evaluation program? What about some discussion of the overall POI program for the total number of POIs (over 90) -- what studies are being performed and how will the need for action or no-further-action at these sites be determined, etc. This will help EPA and the public to understand the overall POI program and how this report fits in.

Comment 2. Page 2-1, first sentence of last paragraph. Typo. "indicate" should be "indicated".

Comment 3. Page 2-2, Section 2.5, bullets 2 and 4. Please define terms "de minimus" and "significant" for this POI program.

Response 1. Comment acknowledged. The scope of the initial preliminary evaluation task order was to assess only 52 (not 57 as erroneously stated in the draft report) of the total 92 POIs identified in the BCP. These 52 POIs were divided into three groups: A, B, and C. The POIs designated as Group A were generally those located on NTC property for which early lease or transfer was anticipated. The remaining POIs were arbitrarily placed in Groups B and C.

A Final Comprehensive POI report is currently scheduled to be submitted around June 1996. This document will include a discussion of the overall POI program, and will address each of the 92 total POIs at the installation, providing the results of each POI evaluated and the recommendations regarding further action.

Response 2. The sentence was re-written and the typographical error was corrected in the text.

Response 3. The word "de minimus" will be replaced with the words "small quantities", and the word "significant" replaced with the word "major". While, the meaning of the words are similar, the replacement words are slightly less subjective. These words are used to indicate that there is some subjectivity built into the evaluation process, and to show that the evaluator must use some degree of professional judgment in assessing the impact of an identified release.

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Comment 4. Section 3. How about some actual text/discussion of the results. Tables are good but they do not provide much detail. In particular, please provide some additional detail on POIs 1, 18, and 51. For POI 1, please give more information on the location of this line. I know that sampling was done but where on the line. It is very old and thus we should be certain we are comfortable with no further action. For 18 and 51, what is the additional action recommended.

Comment 5. Please include a map showing the locations of the POIs.

Response 4. The purpose of the preliminary evaluation report is to summarize the information for each POI that contributed to a further action or no further action recommendation for that POI. As such, discussion of results on the POI summary sheets has been limited. However, key backup documentation (including information on POI 1) will be provided, wherever available and appropriate, as an appendix in the Final Comprehensive POI report.

The exact extent of further action at POI 18 is undetermined at this time; however, a geophysical survey to locate any remaining tanks is recommended. After further consideration, no further action is recommended for POI 51 due to the volatile nature of the gases that were used for training. The new recommendation, along with appropriate modifications to parts of the summary sheets, will be included in the Final Comprehensive POI Report.

Response 5. Comment acknowledged. A site map indicating POI locations will be included in the Final Comprehensive POI report.

**COMMENTS ON GROUP A POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
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Comments from Alice Gimeno

**Group A POIs
Naval Training Center, San Diego**

Alice Gimeno
California Environmental Protection Agency, Department of Toxic Substances Control

Received: 6 July 1995

Comment 1. The POI summary sheets have numerous references to various documents reviewed during the evaluation. Key backup documentation, such as the correspondence from the RWQCB in POI No. 1, laboratory analysis data, or other contractor reports should be photocopied and made available to the reader, possibly in a separate document.

Comment 2. Please provide a site map indicating the POI locations.

Comment 3. Page 7, POI 10, Disposal Methods: What type of documents stated that building 393 and 394 were once 90-day hazardous waste storage areas and what types of wastes were stored? Information Sources Used: What kind of engineering data was used to evaluate environmental conditions? See comment one (Comment 6 above). How is this building constructed, like POI 24? Please clarify.

Comment 4. Page 13, POI 12, Likelihood of Release: A copy of the Industrial Waste Discharge permit should be in the reference appendix mentioned in comment one (Comment 6 above). More verification documentation is needed to ascertain whether the floor drains went to the storm drain lines or the sewer lines. Please check with the Base Environmental Coordinator, Mr. Phill Dyck, on the survey done on identification of storm drain hookups. We can not concur on POI 12 until more information is provided.

Response 1. Comment acknowledged. Key backup documentation will be included as an appendix in the Final Comprehensive POI report.

Response 2. Comment acknowledged. See response to Comment 5 above.

Response 3. Documentation for another area was inadvertently reviewed for this POI, and it was concluded in error that Buildings 393 and 394 were 90-day hazardous waste storage areas. There is no information indicating that Buildings 393 and 394 were 90-day hazardous waste storage areas and the POI summary sheet will be revised accordingly. Buildings 393 and 394 are not constructed like Building 74 (POI 24). These buildings are concrete bunker-like structures. This will be clarified on the summary sheet.

Response 4. As there are no permits for individual buildings at NTC, copies of the installation's current Industrial Waste Discharge permit (issued in 1994), and a discharge permit dated 1989, will be included in an Appendix of the Final Comprehensive POI report. It is believed that the interior drains at this POI are connected to the sewer system and not the storm drain. This is substantiated based on the 1989 discharge permit, which includes a specific limitation on wastewater discharge for the dental x-ray operation wastewater from building 557. The limitation defines maximum flow and chemical concentrations allowed, and notes that the City Industrial Waste Program will periodically collect wastewater samples at the sewer manhole at the southwest corner of building 557.

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Comments from Alice Gimeno

**Group A POIs
Naval Training Center, San Diego**

Comment 5. Page 16, POI 13, Hazardous Substances or Petroleum Products Used/Generated/Stored: More information is needed on the catch basins. Are they lined or unlined? Was anything observed in the catch basins? Where do they drain? We can not concur on POI 13 until more information is provided. Soil sampling in the catch basins is recommended.

The Final Storm Drain Illicit Connection Survey/Non-Storm Discharge Elimination and Prevention Program report for NTC was reviewed. This report identified two illicit storm drain connections associated with building 557, however, they consisted of connections to the storm drain from the steam line, located across Spruance Road from building 557. No illicit connections to the storm drain directly from building 557 were identified in the survey, which further indicates that the floor drains do not connect to the storm drain. Copies of the photos and figures showing these illicit connections will be included in an Appendix of the Final Comprehensive POI report.

The above additional information will be included in the POI summary sheet of the Final report.

Response 5. Additional site visits were conducted for this POI to determine whether or not the catch basins are lined, and to obtain any additional information. Out of a total of eight catch basins, six catch basins were observed to be in-use, and two catch basins were backfilled with concrete. Five of the six in-use catch basins were partially filled with water. The sixth was filled with approximately 1 foot of sediment. The sides of the basins were observed to be concrete, and the bottoms were probed and found to be solid, presumably also concrete. Site personnel indicated that the basins drained into the sewer. No odors were noted in the observed catch basins. A minor sheen was observed on the catch basins containing water. The basins appeared to be in good condition. Soil sampling is not believed to be necessary since the catch basins appeared to be concrete-lined. This additional information will be added to the POI 13 summary sheets.

**COMMENTS ON GROUP B POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
CTO-0082**

Comments from Claire Trombadore

**Group B POIs
Naval Training Center, San Diego**

Claire Trombadore
United States Environmental Protection Agency

Received: 16 August 1995

Comment 1. Section 1. Please briefly describe the overall POI program. Report notes that 52 POIs were identified as needing further study and divided into Groups A-C. How were the 52 POIs assigned to Groups A-C, chronological order for those in the preliminary evaluation program? What about some discussion of the overall POI program for the total number of POIs (over 90) -- what studies are being performed and how will the need for action or no-further-action at these sites be determined, etc. This will help EPA and the public to understand the overall POI program and how this report fits in.

Comment 2. Please clarify the total number of POIs divided into groups A, B and C -- In the Group A report, 57 were cited and in this Group B report, its 52.

Comment 3. Page 2-2, Section 2.5, bullets 2 and 4. Please define terms "de minimus" and "significant" for this POI program.

Response 1. Comment acknowledged. The scope of the initial preliminary evaluation task order was to assess only 52 of the total 92 POIs identified in the BCP, with these 52 POIs divided into three groups (Groups A, B, and C). The POIs designated as Group A were those generally located on NTC property for which early lease or transfer was anticipated. The remaining POIs were arbitrarily placed in Groups B and C. A Final Comprehensive POI report is currently scheduled to be submitted around June 1996. This document will include a discussion of the overall POI program, and will address each of the 92 total POIs at the installation, providing the results of each POI evaluated and the recommendations for further action.

Response 2. Comment acknowledged and incorporated. A total of 52 POIs were divided into Groups A, B, and C and included in the preliminary evaluation. The Final Comprehensive POI report will identify the correct number of POIs.

Response 3. The word "de minimus" will be replaced with the words "small quantities", and the word "significant" replaced with the word "major". While, the meaning of the words are similar, the replacement words are slightly less subjective. These words are used to indicate that there is some subjectivity built into the evaluation process and to show that the evaluator must use some degree of professional judgment in assessing the impact of an identified release.

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Comments from Claire Trombadore

**Group B POIs
Naval Training Center, San Diego**

Comment 4. Section 3. How about some actual text/discussion of the results. The summary table and summary sheets are good but they do not provide much detail.

Comment 5. Appendix. Please provide more detail on some of the summary sheets, particularly when hazardous substances have been used at the POI, to better justify recommendations of no further action. The earlier sections of the POI document emphasize that if information is insufficient and there is the potential for problems, further action will be recommended. For example, under "Previous Operations" on the summary sheets, the full duration of the operation is often not presented. For example, for POI 8, all operations were shutdown in 1994 but how long had they been active? Since 1956 when it was built? Was it a closed loop system throughout its operation? These facts might prompt the Navy to consider recommending the POI for sampling. Use of PCE at a site for 40 years might warrant some confirmation sampling to ensure there was no historic release. Also, please discuss what will be next steps regarding the POIs for which further action was recommended.

Response 4. The purpose of the preliminary evaluation report is to summarize the information for each POI that contributed to a further action or no further action recommendation for that POI. As such, extensive discussion of results in the POI summary sheets has been limited. However, key backup documentation will be included, wherever available and appropriate, as an appendix in the Final Comprehensive POI report.

Response 5. POI locations at which operations have ceased were the most difficult to evaluate because of the absence of "first-hand" information sources. However, based on information gathered for POI 8, further action is not recommended. A visual observation of the dry cleaning system at Building 443 showed a closed loop system. Details about the closed loop system operation are contained in a memo from NTC to SWDIV (dated May, 1996). The memo documents a conversation regarding the machine's operation with one of the former maintenance operators of the school. The machine was reported to have been purchased in 1977. Compliance Inspection Reports from the County of San Diego do not indicate any violations for spills, storage and handling, or other such material or waste storage or handling problems. The violations that are listed are only for record keeping. No documentation on the use of any other system of operation has been found for this POI. The additional information from the memo, Compliance Inspection reports, and conversations with base personnel will be summarized in the POI8 summary sheets, and copies of these documents will be included in the Final Comprehensive POI report. Based on the additional information and documentation, the likelihood of a release is considered to be low. No documentation on the use of any other system of operation has been found for this location.

Options for further action at those POIs for which further action is recommended is as yet undetermined. It is expected that plans for further action at various POIs will be proposed at a future BCT meeting for discussion and approval. Depending on the POI, further action could consist of sampling and/or a geophysical survey.

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Comment 6. Appendix, POI 19. Based on the contents of this summary sheet, especially the suspected historic use of DDT, perhaps further action should be recommended for this POI.

Response 6. The draft summary sheet for this POI is misleading, and should state that DDT may have been stored at Building 34 for use by grounds maintenance personnel. The author of the report did not intend to give the impression that DDT was used at Building 34. The summary sheet will be revised, when presented in the Final Comprehensive POI report, to clarify this issue.

Comment 7. Please include a map showing the locations of the POIs.

Response 7. Comment acknowledged. A site map indicating POI locations will be included in the Final Comprehensive POI report.

Comment 8. EPA did not receive a copy of the transmittal letter for this document as well as some earlier NTC documents. In the future, please provide EPA with copies of transmittal letters so that we are certain of the due date for comments and will not need to trouble Navy staff with telephone calls regarding these due dates.

Response 8. Comment acknowledged. The Navy will submit transmittal letters to the EPA as requested.

**COMMENTS ON GROUP C POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
CTO-0082**

Comments from Alice Gimeno

**Group B POIs
Naval Training Center, San Diego**

Alice Gimeno
California Environmental Protection Agency, Department of Toxic Substances Control
Received: 21 August 1995

Comment 9. Please provide a site map indicating the POI locations.

Response 9. Comment acknowledged. See response to Comment 7 above.

Comment 10. Page 1, POI 8: Was the one 5-gallon container of PCE the only tank used historically at this facility? Is there information on the volumes of PCE used, and what was the nature of the leak in 1993? We can not concur on POI 8 until more information is provided. Confirmation sampling is recommended for this POI.

Response 10. It is understood that Building 443 was used only as a training facility, and small quantities of PCE were used infrequently during training activities. The PCE washing machine in the building has a closed loop system. Additional details about the dry cleaning process are contained in a memo from NTC to SWDIV (dated May, 1996). The memo documents a conversation regarding the machine's operation with one of the former instructors of the school. The dry cleaning machine was reported to have a capacity of approximately 80 gallons of PCE. Approximately every 6 months, 25 gallons of PCE was added to maintain the fluid level.

A repaired leak was noted, where residue on the machine facing gasket had leaked. The ground is covered with concrete, and the quantity released was minor. No other releases have been reported, and the facility is now closed. When the facility was closed, PCE was removed from the machine and the equipment was triple rinsed. The associated piping that runs along concrete trenches appear clean with no noticeable staining. Based on these observations, confirmation sampling is not believed to be necessary. An NTC Environmental Office memorandum describing operations at POI 8, along with the May 1996 memorandum, will be included in an appendix in the Final Comprehensive POI report. Information from these memorandums will be referenced in the summary sheets, as appropriate.

**COMMENTS ON GROUP C POINTS OF INTEREST
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Comments from Alice Gimeno

**Group B POIs
Naval Training Center, San Diego**

Comment 11. Page 7, POI 19: Was the lye vat removed? It seems that a lot of hazardous substances were used at this location, including paints, pesticides, and petroleum products. What was the source of the hydrocarbon odors? Was there a ground spill? We can not concur on POI 19 until more information is provided. Confirmation sampling is recommended for this POI.

Comment 12. Page 16, POI 39: Please provide the sampling results of the transformer PCBs. Key backup documentation should be made available to the reader, possibly in a separate appendix document.

Comment 13. Page 22, POI 43: Was steam the only method of sterilization used since 1942?

Comment 14. Page 24 and 26, POIs 44 and 45, Torpedo Equipment Storage and Torpedo Classroom: Please provide additional information on these POIs. Checking with other military training installations with torpedo equipment storage and classrooms may verify whether or not hazardous substances, such as fuel for the torpedoes, were used at these POIs.

Response 11. During a site visit on 24 April 1995, it was observed that the lye vat was removed. Also, the source of the petroleum hydrocarbon odor noted is believed to be the gasoline once stored in the outside storage locker. The summary sheet states that the materials encountered were stored, not used, at Building 34; and materials storage presents a lower potential for a release than the actual use of materials. Also, there were no reported ground spills at POI 19. Since material storage only took place at this location, and there are no reported ground spills, no further action is recommended for this POI. The text will be revised to discuss Quarterly Hazardous Waste Inspection. Copies of two past inspections have been included as back-up documentation.

Response 12. Comment acknowledged. Key backup documentation will be included as an appendix in the Final Comprehensive POI report.

Response 13. According to the data reviewed, only steam was used to sterilize mattresses at Building 288.

Response 14. Navy regulation Naval Sea Systems Command (NAVSEA) Operations (OP) 5 Volume 1, governs the use of ammunition ashore -- specifically the handling, stowage, production, renovation, and shipping of ammunition. The regulation states that all ammunition used for training purposes must be certified as inert prior to use. As NTC is a training facility which used ammunition for training purposes, ammunition (including torpedoes) must be inert to comply with this Navy regulation.

**COMMENTS ON GROUP C POINTS OF INTEREST
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Comments from Alice Gimeno

**Group B POIs
Naval Training Center, San Diego**

Comment 15. Page 32, POI 56: What indicates the compressor as being electrically driven? How do plan drawings from 1921 indicate the presence or non-presence of hazardous substances? Please provide more information.

Response 15. The purpose of the ejector house was to force sewage through underground sewer pipelines using a compressor. Based on this use, the primary chemicals of concern might be storage of petroleum hydrocarbons to power the compressor engine. However, a review of the design drawings showed no USTs, ASTs, or small diameter piping which would be present if the compressor engine were powered by diesel, gasoline, or natural gas. Therefore, the next possible alternative was that the compressor engine was powered electrically. Although design drawings, by themselves, would not indicate the presence or absence of hazardous substances, they were used to assist in eliminating the possibility of petroleum hydrocarbon use and storage at this location. An additional review of building records and engineering drawings indicated that the power source for the compressor was electricity. A copy of the pertinent drawing will be included in the Final Comprehensive POI report.

**COMMENTS ON GROUP C POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
CTO-0082**

Comments from Alice Gimeno

**Group C POIs
Naval Training Center, San Diego**

Alice Gimeno
Department of Toxic Substances Control

Verbal comments received 30 May 1996; 3:40 p.m.

GENERAL COMMENTS

COMMENT 1: POI 14, page 1: Was equipment used in school always a closed system? This is stated in current process description, but not past.

RESPONSE 1: As described under "Previous Process Description" on page 2, the internal lubrication mechanisms for past equipment operations were considered to be closed systems. This is based on the available information on past operations contained in a memo to file from Kelli Shumaker, dated August 31, 1994, a drawing of the facility dated December 1940, and the typical process used by this type of equipment. These machines use a closed system to prevent contamination by metal burrs and dust particles which would damage the machines. (Copies of the two noted documents are contained in Appendix B of the Group C POI report). A foundation plan was recently found showing a former wood block floor in the machine shop area. Based on this plan, the further action will be recommendation for this POI. A copy of the foundation plan will be included in the Final Comprehensive POI report.

When were the PCB fluids replaced with non-PCB fluids?

In 1988, a PCB-abatement program was initiated at NTC. Over a period time, all PCB-containing fluids were replaced with non-PCB containing fluids. As of 31 August 1994, 60 percent of all machines at the Machinery Repairman School had been tested for PCBs. Of the tested machines, 100 percent were reported to contain fluids with nondetectable concentrations of PCBs. According to the latest PCB inventory and retrofitting results, there are no PCB-contaminated transformers or other equipment containing PCBs located at NTC (Draft SSEBS, May 1996)

Specify the detection limits noted in last sentence of previous process description.

The typical detection limit of U.S. EPA Method 8080 is 0.2 µg/L. The specific detection limit used at the time of testing is not known.

**COMMENTS ON GROUP C POINTS OF INTEREST
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Comments from Alice Gimeno

**Group C POIs
Naval Training Center, San Diego**

COMMENT 2: POI 25: What is a “ship service building?”

RESPONSE 2: A Ships Service Building is a base version of a ship’s exchange. Typically, the ship’s service provides the sailors with barber services, laundry services, tailor services, photo services, a soda fountain, and merchandise.

COMMENT 3: POI 47, Appendix B: Page 9 of the Law/Crandall Report is missing. (Law/Crandall Report here at SWDIV.)

RESPONSE 3: A complete copy of Appendix B, the Law/Crandall report on geotechnical and environmental investigation will be included in the final document.

COMMENT 4: POI 53/67: Add language about the current status of transformers. Specifically the PCBs in the fluids.

RESPONSE 4: PCBs at NTC are regulated under the Toxic Substances Control Act (TSCA), 40 CFR 761, and OPNAVINST 5090.1. A PCB-abatement program addressing PCB-containing equipment was initiated at NTC in 1988. The program is managed by the Navy PWC. According to the latest PCB inventory and retrofitting results, there are no PCB-contaminated transformers or other PCB-containing equipment located at NTC (draft SSEBS May 1996). In the area around the transformers, the concrete pad supporting the transformers was observed to be in good condition, with only one crack. The concrete comprising the parking area around the pad (between buildings 1 and 14) is in fair condition with minor to moderate cracking and minor buckling of the pavement. The only stains noted at POIs 53/67 were small dark stains from leaking vehicle fluids (oil, etc.). This information will be added to the current process description for POIs 53 and 67 in the final report.

COMMENT 5: POI 14, Appendix: 1992 March 13 memo - what is the current status?

RESPONSE 5: As of 5/92, the Hazardous Waste/Oil Storage Facility, located on the west side of Building 49, was operating. This was verified by a “Minor Job Plan Customer Acceptance and Rating” form dated 5/13/92. This document notes that the project was completed in accordance with the scope of work. This storage facility is currently operational.

7/23/96

**COMMENTS ON GROUP C POINTS OF INTEREST
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Comments from Alice Gimeno

**Group C POIs
Naval Training Center, San Diego**

The reference in the memo to “remediation of underground hydrocarbon (diesel) contaminated soil” pertains to Site 7, at which a 3,200 gallon UST was formerly located. The UST at Site 7 was located adjacent to building 50A (east of POI 14). A summary of the Site 7 investigation and remediation (which occurred in winter of 1995) is contained in the Draft NTC Site Specific Environmental Baseline Survey. Remediation at Site 7 did not impact POI 14. The recommendation for POI 14 will be changed to further action, as mentioned under the response to Comment 1.

7/23/96

**COMMENTS ON GROUP C POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
CTO-0082**

Comments from Martin Hausladen

**Group C POIs
Naval Training Center, San Diego**

Martin Hausladen, Group C

Verbal comments received 28 May 1996 via teleconference

SPECIFIC COMMENTS

COMMENT 1: POI 25, page 5: Spelling of materials in "Previous Process Description" is incorrect.

RESPONSE 1: The typographical error will be corrected in the text.

POI 25, page 6: Was there a dry-cleaning operation at this location? How were chemicals used at the photo-lab at the site disposed?

Personnel familiar with facilities involving supply and maintenance of uniforms and clothing were interviewed. Based on those conversations, the Uniform Shop was a facility that provided uniforms to military personnel. According to Robert Ashton of NTC, the uniform shop was reported to have one steam press, but did not have dry cleaning facilities. The Uniform and Laundry Repair School was a teaching facility for repair of uniforms and other articles of issued clothing. Typically, neither of these facilities included dry-cleaning services. Dry cleaning services were provided at other facilities (POIs 8, 16, and 46). This additional information will be included on the POI summary sheet.

As noted on pages 5 and 6 in the POI Group C report, the types of chemicals historically used were unknown, although the use of photo-developing chemicals was assumed. Disposal methods for photo-chemicals at this location are unknown, as the only information available on the photo-labs was that they were shown on plan drawings. The drawing showing the location of the labs is presented in Appendix B.

COMMENT 2: POI 47, page 8: What happened to the chemicals used at this POI? Was there direct discharge into the sewer system? Was the dry-cleaning operation a closed loop system?

RESPONSE 2: As summarized on page 8, this POI included only a boiler room, sump pit, blow-off tank, and UST. The dry cleaning operation and the associated chemicals referred to are the subject of POI 46 (Group D). POI 46 is the building located next to POI 47.

**COMMENTS ON GROUP C POINTS OF INTEREST
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Comments from Martin Hausladen

**Group C POIs
Naval Training Center, San Diego**

As noted on page 9, three soil samples collected from the former location of the sump pit, UST, and blow-off tank were “non-detect” for hazardous substances. The samples were collected as part of an investigation for the proposed gymnasium performed by Law/Crandall. This investigation included collection of soil and groundwater samples at three locations in the area of POI 46 and POI 47. The results of all of these samples were “non-detect” for petroleum hydrocarbons and volatile organics. A portion of the Law/Crandall report is presented in Appendix B of the Group C POI report.

With regard to the dry cleaning operation, based on the understanding of the dry-cleaning process, the system was a closed-loop operation; therefore, no chemicals would have been directly discharged into the sewer system.

Results of the subsurface investigations for both POIs are contained in the Proposed Gymnasium report prepared by Law/Crandall, dated June 7, 1995.

COMMENT 3: POI 53, pages 11 and 12: How were the photo-chemicals disposed of at this location?

RESPONSE 3: Disposal methods for photo-chemicals at this location are unknown. This facility was demolished 32 years ago, and a transformer pad has been built on the site. No evidence of a release of these chemicals was observed during the field investigation.

COMMENT 4: POI 72/74, there is a page between page 27 and 28 that is out-of-place.

RESPONSE 4: This page will be put in its appropriate place, in Appendix B of the final report.

COMMENT 5: POI 74, determine if chemicals used at this location could have been disposed of down sewer. Was this location for storage only?

RESPONSE 5: This location was used for storage only of chemicals used at the dry cleaning and steam cleaning operations at adjacent buildings 347 and 348 (POIs 47 and 48). Therefore, chemicals would not have been used nor disposed at this location. The building’s small size (72 square feet) further suggests it was used as a storage facility. No evidence of a release, such as stained ground or stressed vegetation (in the grass covering the site), was observed during the field investigation. In addition, laboratory analyses on soil and groundwater samples collected during the proposed gymnasium investigation were “non-detect” for petroleum hydrocarbons and VOCs. The three borings from which the samples were obtained were located in the area of POI 47, 48, and 74 (refer to the response to Comment 2 for additional explanation).

**COMMENTS ON GROUP D POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
CTO-0082**

Verbal Comments from Alice Gimeno and Corey Walsh

Group D POIs	
Naval Training Center, San Diego	
Alice Gimeno and Corey Walsh, Group D	
Verbal comments received 30 May 1996; 3:40 p.m. and 03 June 1996, 3:00 p.m. (Comment 1 only*).	
GENERAL COMMENTS:	
The report is not user friendly. Please put the report in a more comprehensive format (e.g.: add charts for sampling data, appendix sampling information should be in report).	Comments noted. Additional analytical summary and cross-reference tables will be included in Appendix C.
The cross sections are sloppy. (Corey Walsh)	Comment noted. Cross sections will be checked and modified as appropriate for consistency and clarity.
More interpretation on GPR results are needed.	As stated on page 4-1, "Unless otherwise noted, the results of all geophysical surveys for all POIs in this section are summarized from the results and interpretations presented in the Geophysical Site Characterization report by NORCAL...". The intention of the geophysical sections was to summarize the NORCAL findings. The NORCAL report is included in Appendix A. Where possible, however, the summary sections of the geophysical results will be clarified and expanded. Modification to the geophysical sections will be made to the following POIs: 26, 46, 48, 57, 59, 60, 62, 76, 88, 89, and 92. Modified sections include some or all of the following: Geophysical Investigation Description, Geophysical Results, and/or Conclusions and Recommendations.
SPECIFIC COMMENTS	
COMMENT 1 (*see above): POI 28: Why did the sample area deviate from the Work Plan?	RESPONSE 1: The actual sampling area did correspond to the sampling area shown in the Work Plan, based on measurements taken in the field. However, due to some differences between coordinate systems used on NTC, the transformer storage area is depicted on the figure as being slightly skewed from the sample area. The figure will be corrected in the final report.

**COMMENTS ON GROUP D POINTS OF INTEREST
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Verbal Comments from Alice Gimeno and Corey Walsh

**Group D POIs
Naval Training Center, San Diego**

COMMENT 2: Page 3-8, Section 3.3.2, last sentence of last paragraph. Why wasn't the procedure performed?

RESPONSE 2: Screening was to be performed only if lead bullet fragments were observed in the soil samples. Since lead bullet fragments were not observed in any of the soil samples, it was not necessary to screen the samples, and the procedure was not performed. The text will be clarified to include this explanation.

COMMENT 3: POI 57, page 3-10: DTSC and RWQCB do not agree with the groundwater sampling procedure.

RESPONSE 3: Attempts were made using the direct-push rig to obtain water samples at the required depth. However, due to the tight silty conditions, the hydraulic ram on the direct-push rig met refusal at or near the water table, and no water could be obtained. Since this method failed, a sample was collected from within the hollow stem of the auger (the auger was left in the borehole during this procedure, minimizing the likelihood of potential cross-contamination). This POI is recommended for further action.

COMMENT 4: Page 4-35, Section 4.4.1, paragraphs 2 and 3: Provide more detail on the Navy study performed.

RESPONSE 4: Details pertaining to this study are presented in the following document: Department of the Navy, Navy Public Works Center. 1990. PCB Spill Site Cleanup. Correspondence from Commanding Officer, Navy Public Works Center, San Diego to Commanding Officer, Naval Training Station, San Diego, Attn.: Code 17.4. Ser 640/000043. 11 January. The detail included in the draft report represents the level of detail that was given in the Navy study. A copy of the Navy study document is attached.

Why were the wipe tests considered not to be conclusive?

The wipe tests were not considered conclusive because wipe tests are not an appropriate method for sampling soil. Therefore, PCB spill area was added to the POI list for further investigation and confirmation of remediation by conducting appropriate soil sampling.

COMMENT 5: Page 4-45, Section 4.6.1. Provide more detail on the Leroy Crandall report (date, etc.)

RESPONSE 5: The primary focus of the investigation was to identify the dynamic and static loads the existing fill soil could withstand based on the design of the proposed gymnasium. As part of this investigation, a total of three environmental borings were advanced on 27 April 1995 at the POI. The borings were 11 feet bgs in depth. Twelve soil samples and three groundwater samples were collected. The soil samples were evaluated with a

**COMMENTS ON GROUP D POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
CTO-0082**

Verbal Comments from Alice Gimeno and Corey Walsh

**Group D POIs
Naval Training Center, San Diego**

<p>COMMENT 6: Page 4-47, Section 4.6.3.2: Work Plan stated that 8015 would be modified for Stoddard solvent. Was it?</p>	<p>photoionization detector. Eight soil samples and three groundwater samples were sent to an analytical laboratory for analysis by U.S. EPA Methods 8240, modified 8015, and 418.1. As stated in the report, all reported results were below the detection limits. Section 4.6.1 will be revised to include this information.</p>
<p>Why weren't HVOCs tested for in groundwater?</p>	<p>RESPONSE 6: U.S. EPA Method 8015 was modified to analyze the ranges of hydrocarbon chains corresponding to Stoddard solvent, as well as gasoline, kerosene, JP4, JP5, diesel #2, lubrication oil, and other extractable hydrocarbons.</p>
<p>COMMENT 7: Page 4-54: Decimal error SB-6 (DDT, DDE). Check SB-10.</p>	<p>HVOCs were tested in groundwater. During preparation of the draft report, only some of the analytical data had been validated and entered into the BNI database. As a result, the HVOC results were inadvertently excluded, but they will be included in the final report. The HVOC results for groundwater were reported to be below the detection limits for all analytes.</p>
<p>COMMENT 8: Page 4-65, Section 4.10.1.1, third sentence: Is this sentence correct?</p>	<p>RESPONSE 7: Figure 4-29 will be revised to correct all decimal errors. All other figures with organics results were also checked. Errors were also corrected on Figure 4-11.</p>
<p>COMMENT 9: Page 4-65, Section 4.10.2.1: Provide more information on GPR results. What does "relatively undisturbed" mean? How does this lead us to a NFA conclusion?</p>	<p>RESPONSE 8: This sentence will be deleted from Section 4.10.1.1. Section 4.10 and 4.10.1 will be revised to clarify that the existence of USTs at this POI is only a possibility. In addition, Sections 4.10.1 and 4.10.3 will be revised to include information on a portable pump system.</p>
	<p>RESPONSE 9: "Relatively undisturbed" is a description used to depict subsurface conditions which do not exhibit any large or significant anomalies that could be interpreted to result from a former UST excavation. However, there may be changes in soil density which has been interpreted <u>not</u> to be indicative of a buried or formerly buried structure. There was no indication of a former buried UST at this POI. In addition, there was some documented evidence that pumps used to transport seawater to NTC consisted of a trailered above-ground pump system. No evidence of USTs has been documented for</p>

**COMMENTS ON GROUP D POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
CTO-0082**

Verbal Comments from Alice Gimeno and Corey Walsh

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Naval Training Center, San Diego**

	<p>POIs 59 and 60 Therefore, no further action was recommended. The text in Sections 4.10.1, 4.10.2.1, and 4.10.3 will be revised to include this additional information and clarify the GPR results.</p>
<p>COMMENT 10: Page 4-67, Section 4.11.1.1: Elaborate on GPR results.</p>	<p>RESPONSE 10: Please refer to Response to General Comment and to Response 9. Sections 4.11, 4.11.1, 4.11.2.1, and 4.11.3 will be modified in a similar manner to POI 59 to clarify that the existence of a UST is only a possibility, and to clarify the geophysical results and interpretation.</p>
<p>COMMENT 11: Page 4-76, Section 4.13.2.1: Elaborate on GPR results.</p>	<p>RESPONSE 11: Plates 14 and 15 in the NORCAL report show two low magnitude anomalies, which (based on their low magnitudes) NORCAL interpreted to represent limited amounts of localized metal debris. Other smaller concentric anomalies were scattered throughout the survey area. These anomalies were not associated with surface cultural features. NORCAL could not conclude whether or not the anomalies represented spent ammunition.</p> <p>The investigation was performed to identify any potential larger caches or buried piles of weapons, ammunition, or other larger amounts of firing range debris such as buried piles of spent casings. Based on the geophysical interpretation, no such debris was found. Minor amounts of spent casings were not considered to be of concern. Sections 4.13.1.2, 4.13.2.1, and 4.13.4 will be revised to elaborate and clarify the GPR results and interpretation.</p>
<p>COMMENT 12: Page 4-82: Provide more information on AST – add language as to what type of fuel could have been stored here. Please provide more elaboration on visual observations – any sign of release?</p>	<p>RESPONSE 12: The only information on this aboveground storage tank (AST) was the reference to it as a “distillate tank” on historical maps. Since the AST was located behind the Mess and the tank contained a distillate, the assumption was made that it contained a distillate fuel for cooking. Distillate type fuels have very high volatility and the area is covered with concrete. Therefore, it is likely that if there were any spills, they would have evaporated before entering the subsurface.</p> <p>The only sign of the previous AST was the rusted bolt in the concrete pad which was used to hold the AST stationary. The concrete pad appeared to be</p>

**COMMENTS ON GROUP D POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
CTO-0082**

Verbal Comments from Alice Gimeno and Corey Walsh

**Group D POIs
Naval Training Center, San Diego**

in good condition, although much of it was covered by the existing refrigeration unit. Concrete in the driveway areas around the pad was in fair condition with minor cracking. No areas of staining indicating a potential release were observed on the pad. The only staining noted consisted of small dark patches in the driveway areas from leaking fluids from vehicles. The text in Sections 4.15, and 5.15.1 will be revised to include this additional description.

COMMENT 13: Page 4-84, Section 4.16.2.1: States "...possible former excavation...". Please elaborate.

RESPONSE 13: Please see Response to General Comment. With regard to the possible former excavation at POI 76, the NORCAL report states as follows (from page 23): "The records also indicate a zone of strong reflection patterns located in the southeast corner of the survey area, as shown on Plate 16. The strong reflection patterns resolved within this zone may indicate disturbed soils that may be associated with a former excavation." By the nature of geophysical methodology, which is an indirect technique that allows only the geophysicist to interpret the instrument's readout, a more definitive interpretation is often not possible.

**COMMENTS ON GROUP D POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
CTO-0082**

Verbal Comments from Martin Hausladen

**Group D POIs
Naval Training Center, San Diego**

Martin Hausladen, Group D

Verbal comments received 28 May 1996; via teleconference

GENERAL COMMENTS

COMMENT 1: POI 46: What was the rationale for only one boring at this POI? Provide justification for this decision.

RESPONSE 1: Three soil borings previously had been advanced into the saturated zone beneath the POI as part of a geotechnical investigation for a proposed gymnasium (see Response 5 to DTSC/RWQCB Group D comments).

All analytical results from the geotechnical investigation were reported below detection limits. Based on review of the geotechnical investigation results, one additional boring was deemed sufficient.

COMMENT 2: POI 59: "Relatively undisturbed" is not definite enough. Please clarify discussion of geophysical results and clarify conditions.

RESPONSE 2: The GPR investigation identifies the varying degrees of density in the soil. Sometimes this variance is caused naturally. Other times, the variance is man-made. The GPR technique is a noninvasive technique that does not allow direct observation or other geotechnical testing of the subsurface. Therefore, the GPR technique allows the geophysicist to interpret the results of the instrument readout only. "Relatively undisturbed" is a description used to depict subsurface conditions that do not exhibit any large or significant anomalies that could be interpreted to result from a former UST excavation. There was no indication of a former buried UST at this POI. In addition, there was some documented evidence that pumps used to transport seawater to NTC consisted of a trailered aboveground pump system. No evidence of USTs has been documented for POIs 59 or 60. Therefore, no further action was recommended. The text in Sections 4.10.1, 4.10.2.1, and 4.10.3 will be revised to include this additional information and clarify the GPR results.

COMMENT 3: POI 60: "Relatively undisturbed" is not definite enough. Please clarify discussion of geophysical results and clarify conditions.

RESPONSE 3: Please refer to Response 2.

**COMMENTS ON GROUP D POINTS OF INTEREST
NAVAL TRAINING CENTER, SAN DIEGO
CTO-0082**

Verbal Comments from Martin Hausladen

**Group D POIs
Naval Training Center, San Diego**

COMMENT 4: POI 62: Geophysical investigation identifies “minor amounts of possible spent casing”.

However, in conclusions, there is a recommendation for no further action.

Justify no further action or clarify conclusions.

COMMENT 5: POI 76: Geophysical investigation identifies “former excavation”. Determine if a UST was formerly present and if so, why wasn’t the former excavation sampled?

RESPONSE 4: The investigation was performed to identify any potential larger caches or buried piles of weapons, ammunition, or other larger amounts of firing range debris such as buried piles of spent casings. Based on the geophysical interpretation, no such debris was found. Minor amounts of spent casings were not considered to be of concern. Sections 4.13.1.1, 4.13.2.1, and 4.13.4 will be modified to clarify the geophysical interpretation and conclusions.

RESPONSE 5: NORCAL interpreted a marked change in soil density to be a possible former excavation. As described in Response 2, the nature of geophysical methodology often prevents a more definitive interpretation. However, the GPR data as interpreted by NORCAL do not indicate hyperbolic signatures within the upper 3 feet of soil that could represent a UST. It is recognized that, although the UST was in all likelihood removed, soil sampling may need to take place to confirm that a release from this former UST did not take place. Therefore, the recommendation for POI 76 will be changed from NFA to FA (refer to Section 4.16.3).

**COMMENTS ON GROUP D POINTS OF INTEREST
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CTO-0082**

**Group D POIs
Naval Training Center, San Diego**

ADDITIONAL REPORT CHANGES, GROUP D

The following are additional changes that were made to the Final Group D report.

POI NUMBER

SECTION/MODIFICATION

---	SECTION 3.3.1: The soil sampling description was modified.
POI 7	SECTION 4.1.3.3: Clarifications and corrections were made to Table 4-1.
POI 20	SECTION 4.2.4: Clarifications and corrections were made to Table 4-2. The text in the section was modified to reflect the corrections
POI 26	SECTION 4.3: Figure numbers were corrected.
POI 26	SECTION 4.3.3: Clarifications and corrections were made to Table 4-3. The text in the section was modified to reflect the corrections.
POI 46	SECTION 4.6.2.1: Surveyed area was corrected.
POI 57	SECTION 4.8: Reference to a recent investigation located nearby POI 57 was added.
POI 61	SECTION 4.12: The site description was clarified.
POI 89	SECTION 4.18: Summary of a recent UST removal was added to the description.



DEPARTMENT OF THE NAVY
NAVY PUBLIC WORKS CENTER
SAN DIEGO, CALIFORNIA 92136-5113

5090
Ser 640/000043

11 JAN 1990

From: Commanding Officer, Navy Public Works Center, San Diego
To: Commanding Officer, Naval Training Station, San Diego, Attn: Code 17.4

Subj: PCB SPILL SITE CLEANUP

Encl: (1) Spill Report Msg 071640Z Jul 88
(2) Sample Records and Results
(3) Uniform Hazardous Waste Manifests
(4) Confirmation Sample Results
(5) Second Confirmation Sample Results

1. Cleanup of the Polychlorinated Biphenyl (PCB) spill site at Stockton and Evans Roads on Naval Training Station has been completed. The site is now available for use without restrictions.

2. The original PCB spill necessitating this cleanup occurred on 6 July 1988. At that time, the site was being used as a temporary storage area for contractors working on electrical distribution upgrades. Removed PCB containing electrical equipment was stored at this site while awaiting disposal by General Electric (G.E.), a contractor retained by the Defense Reutilization and Marketing Office (DRMO). Enclosure (1) documents a spill that occurred while G.E. was moving a transformer.

3. Initial containment and cleanup of free liquid was performed by G.E. and Public Works Center (PWC) personnel. These were initial response actions only and not designed to decontaminate the site to meet Environmental Protection Agency (EPA) cleanup policy standards.

4. Further decontamination was not done by G.E. but the storage area was in continual use. Both before and after the G.E. spill, other spills of dielectric fluids occurred that were not of reportable quantity (RQ). These other spills, by at least two other contractors caused confusion about cleanup responsibilities thereby delaying final decontamination. Because of this confusion PWC decided to decontaminate the site.

5. Enclosure (2) is a record of samples collected by PWC to provide an initial idea of how widespread the contamination was. A second set of samples was collected to more narrowly define contaminated areas.

6. PWC personnel working under the supervision of a PWC Environmental Protection Specialist excavated the contaminated asphalt and soil and loaded the waste into certified containers prior to hauling waste to an EPA permitted disposal facility. Uniform Hazardous Waste Manifests are included as enclosure (3).

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages ▶

To K PARKER

From G. Sheffer

Dupl. Agency BN-E

Phone # 524-0771

Fax # 624-8787

Fax # 524-5958

NSN 7540-01-317-7380

5099 101

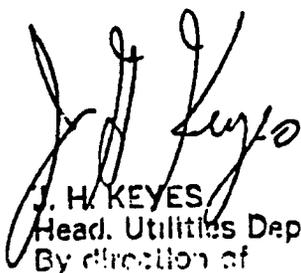
DEFENSE SERVICES ADMINISTRATION

SLIP COPY
PWC Code 6406

7. Post excavation samples were collected and all but one showed contamination levels to be below that required by EPA cleanup policy, enclosure (4). The one non-compliant area was cleaned and confirmation samples showed compliance, enclosure (5).

8. Finally, the excavations were backfilled and compacted and the fence removed.

9. Should you have any questions regarding this matter, please contact Mr. Tim Blyth at 556-7999.



J. H. KEYES
Head, Utilities Department
By direction of
the Commanding Officer

ADMINISTRATIVE MESSAGE

ROUTINE

R 071640Z JUL 88 ZYB PSN 117716S23

FM PWC SAN DIEGO CA

TO COMNAVFACENCOM ALEXANDRIA VA COMNAVBASE SAN DIEGO CA
COMDT COGARD WASHINGTON DC COGARD HSO SAN DIEGO CA

INFO CNO WASHINGTON DC WEEBA PORT HUENEME CA
OICC SW SAN DIEGO CA -WTC SAN DIEGO CA
WESTNAVFACENCOM DET BRDHY SAN DIEGO CA

BT
UNCLAS //NO5998//

OICC SOUTHWEST PASS TO CODE 1141 AND ROICC NORTH BAY
SUBJ: CONSOLIDATED HAZARDOUS SUBSTANCE RELEASE REPORT (REPORT
SYMBOL OPNAV 5898-3) (MIN: CONSIDERED)

1. RELEASE OCCURRED 1830 HOURS, 6 JULY 1988.
2. SOURCE: PWC SAN DIEGO CA UIC N63387. CONTRACTOR - GENERAL ELECTRIC.
3. RELEASE AT CONTRACTOR LAYDOWN AREA NAVAL TRAINING CENTER, SAN DIEGO, CA.
4. OPERATION AT SOURCE OF RELEASE IS ELECTRICAL CONTRACTOR LAYDOWN AREA AND TEMPORARY STORAGE FACILITY.
5. HAZARDOUS SUBSTANCE CONTAINED IN OUT OF SERVICE ELECTRICAL TRANSFORMER.
6. SUBSTANCE RELEASED - POLYCHLORINATED BIPHENYL (PCB) CONTAINING INSULATING OIL.
7. PREVIOUS ANALYTICAL TEST RESULT INDICATES PCB CONCENTRATION OF 405,489 PPM.
8. RELEASE WAS APPROXIMATELY 14 GALLONS.
9. RELEASE ATTRIBUTED TO FAILURE OF EXTERNAL TRANSFORMER VALVE. TRANSFORMER WAS OUT OF SERVICE, ACCOUNTABILITY TRANSFERRED FROM PWC SAN DIEGO TO DEFENSE REUTILIZATION AND MARKETING OFFICE (DRMO) FOR DISPOSAL. DRMO CONTRACTOR, GENERAL ELECTRIC (GE) WAS LOADING TRANSFORMER FOR TRANSPORTATION AT TIME OF VALVE FAILURE.
10. CONTAMINATION LIMITED TO 70 SQUARE FEET OF ASPHALT SURFACED TEMPORARY STORAGE AREA AND SURROUNDING DIRT BERMS.
11. INITIAL RESPONSE BY PERSONNEL. ALL LEAKAGE WAS INITIALLY

CONTAINED IN PLASTIC SHEETING PREVIOUSLY WRAPPED AROUND BOTTOM HALF OF TRANSFORMER. GE IMMEDIATELY BEGAN PUMPING PCB FLUID INTO DRUMS. WHILE PUMPING PLASTIC SHEETING GAVE WAY RELEASING AN ESTIMATED 14 GALLONS OF PCB FLUID.

12. CONTROL/CONTAINMENT ACTIONS TAKEN SO FAR INCLUDE GE PERSONNEL ABSORBING ALL FREE LIQUIDS, BUILDING DIRT BERMS AROUND TRANSFORMER AND COMPLETELY DRAINING TRANSFORMER.

13. CLEANUP/REMOVAL ACTIONS INCLUDE THOSE STATED ABOVE FOLLOWED BY REMOVAL OF ABSORBENT AND CONTAMINATED DIRT BERM MATERIAL, DOUBLE WASH RINSE OF ASPHALT SURFACE, DECONTAMINATION CONFIRMATION SAMPLING AND ANY REQUIRED FOLLOWUP IAW 48 CFR SUBPART C. IAW DEFENSE LOGISTICS AGENCY (DLA) CONTRACTS, SPILL MITIGATION/REMEDATION IS RESPONSIBILITY OF CONTRACTOR (I.E., GENERAL ELECTRIC).

14. NO ASSISTANCE REQUESTED.

15. FOR ADDITIONAL INFORMATION, CONTACT MS. J. ZEVELY, PWC CODE 640, AT AUTOVON 958-6815 OR COMMERCIAL (619) 696-6815.

16. THIS MESSAGE IS BEING FILED FOR INFORMATION PURPOSES. NO ACTION REQUIRED DUE TO THE CONTRACT RESPONSIBILITY PLACED ON GENERAL ELECTRIC. GENERAL ELECTRIC IS FILING REPORTS PER DLA CONTRACT REQUIREMENTS.

BT

DLVR: PWC SAN DIEGO CA (3)...ORIG

BT0: 000-000/COPIES: 0003

117716/6912/190 01 OF 01 03 0374 191/02:38Z 071640Z JUL 88
CSN:RXXS8378 PWC SAN DIEGO CA

UNCLASSIFIED

Page 10

NAVY PUBLIC WORKS CENTER
 ENVIRONMENTAL ENGINEERING LABORATORY
 CHAIN OF CUSTODY

ACTIVITY: PWC Code 640

LAB LOG #00: 90716

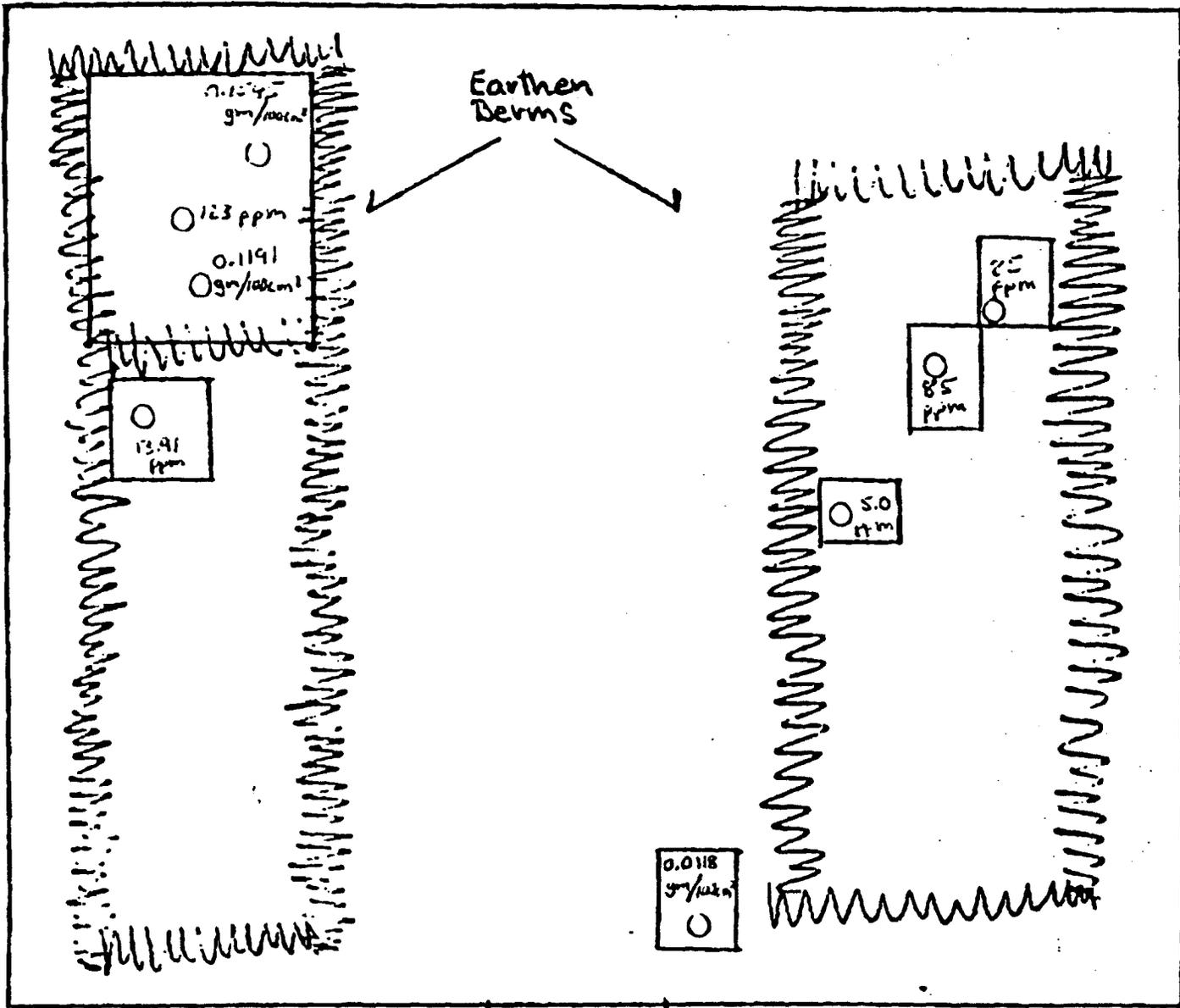
JOB ORDER NO.:

SAMPLE ID	SAMPLE TYPE	ANALYSIS REQUIRED	SAMPLE ID	SAMPLE TYPE	ANALYSIS REQUIRED
1. 71489 NTC-1W	wipe	PCB	20.		
2. " 2W	wipe	"	21.		
3. " 3S	soil	"	22.		
4. " 4W	wipe	"	23.		
5. " 5W	wipe	"	24.		
6. " 6S	soil	"	25.		
7. " 7S	soil	"	26.		
8. " 8S	soil	"	27.		
9. " 9W	wipe	"	28.		
10. " 10S	soil	"	29.		
11. " 11S	soil	"	30.		
12. " 12W	wipe	"	31.		
13. " 13W	wipe	"	32.		
14. " 14W	wipe	"	33.		
			34.		
			35.		
			36.		
			37.		
			38.		

COMMENTS

RELINQUISHED BY <i>[Signature]</i>	DATE/TIME 7/14/89 1135	RECEIVED BY <i>[Signature]</i>	SEND RESULTS TO
RELINQUISHED BY	DATE/TIME	RECEIVED BY	PHONE #:
RELINQUISHED BY	DATE/TIME	RECEIVED BY	M A T I O L

Stockton Rd.



Earthen Berms

north

Evans Rd.

Gate

○ = samples above EPA and California allowances
○ soil samples = ppm

9250-16-02

From: Navy Public Works Center, Environmental Engineering Laboratory, Code 614
Naval Air Station, North Island, Building 728, San Diego, CA 92135
(619) 457-5007

Activity: CODE 640 B

Type of Sample: WIPE ID#: 90716 -14

Date Sample Collected: Date Analyzed: 17 JUL 89 ANALYST: NAA Date Sample Received: 14 JUL 89

Results Expressed As: PCB in milligrams per wipe
SAMPLE IDENTIFICATION AND RESULTS

SAMPLE ID	RESULTS	SAMPLE ID	RESULTS
NTC 1W	0.1545		
NTC 2W	0.1191		
NTC 4W	0.0053		
NTC 5W	ND		
NTC 9W	0.0118		
NTC 12W	ND		
NTC 13W	ND		
NTC 14W	ND		
— NONE FOLLOWS —			

REMARKS: ND = none detected
detection limit = 0.001 mg
maximum allowable limit = 0.01 mg
10 cm x 10 cm = 100 cm²

FORWARDED BY: P. S. W. Ma
LABORATORY SUPERVISOR

DATE: 7/18/89

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No CA 12131710101213121012	Manifest Document No 517101210	Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address NAVY PUBLIC WORKS CENTER CODE 640 PO BOX 113 NAVAL STATION SAN DIEGO, CA 9213			A. State Manifest Document Number 89657010		
4. Generator's Phone (619) 551-8447/7348			B. State Generator's ID H1Y14101311-101213121212		
5. Transporter 1 Company Name UNITED PUMPING SERVICE		6. US EPA ID Number 1C1A131017121915171717	C. State Transporter's ID 073249		
7. Transporter 2 Company Name		8. US EPA ID Number	D. Transporter's Phone (818) 931-9321		
9. Designated Facility Name and Site Address US ECOLOGY INC. HIGHWAY 95 30 MILES SOUTH BEATTY, N.V. 89003		10. US EPA ID Number	E. State Transporter's ID		
			F. Transporter's Phone		
			G. State Facility's ID		
			H. Facility's Phone (702) 553-2203		

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.	
				State	EPA/Other
a. (RQ) POLYCHLORINATED BIPHENYLS NA 7188 WASTE HAZARDOUS SUBSTANCE, SOLID, N.O.S., ORM-E	001	90,998	Y	213	NA RLR
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above A.3 CONTAMINATED SOIL WITH POLYCHLORINATED BIPHENYLS MAXIMUM CONTAMINATION LEVEL 123 PPM Acceptance Number 07-0041-6495		K. Handling Codes for Wastes Listed Above	
		a.	b.
		c.	d.

15. Special Handling Instructions and Additional Information

Item No. 12 should be CM - *TDB*

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Tim Blyth Signature: *TDB* Month Day Year: 11 02 89

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: ANTONIO FIGUEROA Signature: *Antonio Figueroa* Month Day Year: 11 02 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: _____ Signature: _____ Month Day Year: _____

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: _____ Signature: _____ Month Day Year: _____

YELLOW: GENERATOR RETAINS

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's US EPA ID No: CA1211710101213121012
 Manifest Document No: 517101314

Page 1 of 3
 Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address
 NAVY PUBLIC WORKS CENTER CODE 643
 PO BOX 113 NAVAL STATION, SAN DIEGO, CA 92133

4. Generator's Phone: 619 556-8647/7349

6. Transporter 1 Company Name: UNITED PUMPING SERVICE
 8. US EPA ID Number: CA1A1D1D1712191513171713

7. Transporter 2 Company Name: _____
 9. US EPA ID Number: _____

9. Designated Facility Name and Site Address: U.S. ECOLOGY INC.
 HIGHWAY 95.10 MILES SOUTH BEATTY, N.V. 89003
 10. US EPA ID Number: NV1T131310101310101010

A. State Manifest Document Number: 89657014
 B. State Generator's ID: HIYH1013111-101213131213
 C. State Transporter's ID: M0092
 D. Transporter's Phone: 415 933-9326
 E. State Transporter's ID: _____
 F. Transporter's Phone: _____
 G. State Facility's ID: _____
 H. Facility's Phone: (702) 553-2203

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit (Wt/Vol)	1. Waste No.
	No.	Type			
a. (RQ) POLYCHLORINATED BIPHENYLS NA 7388 WASTE HAZARDOUS SUBSTANCE, SOLID, N.O.S., ORM-E	001	DT	000,20	Y	State: 261 EPA/Other: Non R/RA
b. _____	_____	_____	_____	_____	State: _____ EPA/Other: _____
c. _____	_____	_____	_____	_____	State: _____ EPA/Other: _____
d. _____	_____	_____	_____	_____	State: _____ EPA/Other: _____

J. Additional Descriptions for Materials Listed Above
 A-3 CONTAMINATED SOIL WITH POLYCHLORINATED BIPHENYLS
 MAXIMUM CONTAMINATION LEVEL 123 PPM
 Acceptance Number 07-0041-6495

K. Handling Codes for Wastes Listed Above
 a. _____ b. _____
 c. _____ d. _____

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Tim Blyth
 Signature: [Signature]
 Month Day Year: 11/01/89

17. Transporter 1 Acknowledgement of Receipt of Materials
 Printed/Typed Name: [Name]
 Signature: [Signature]
 Month Day Year: 11/02/89

18. Transporter 2 Acknowledgement of Receipt of Materials
 Printed/Typed Name: _____
 Signature: _____
 Month Day Year: _____

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
 Printed/Typed Name: _____
 Signature: _____
 Month Day Year: _____

Do Not Write Below This Line

YELLOW: GENERATOR RETAINS

GENERATOR

TRANSPORTER

FACILITY

1. Generator's US EPA ID No: CA12117101012131210121517101213
 Manifest Document No: 89657011
 Page 1 of 2
 Information in the enclosed areas is not required by Federal law.

3. Generator's Name and Mailing Address: NAVY PUBLIC WORKS CENTER CODE 640, PO BOX 133 NAVAL STATION, SAN DIEGO, CA. 92133
 A. State Manifest Document Number: 89657011
 B. State Generator's ID: HIYIWIQIIL-1012131210121

4. Generator's Phone (714) 551-8447/7349
 5. Transporter 1 Company Name: UNITED PUMPING SERVICE
 6. US EPA ID Number: CA1A1D1D1712191519171713
 C. State Transporter's ID: 010111
 D. Transporter's Phone: (714) 551-8447

7. Transporter 2 Company Name: _____
 8. US EPA ID Number: _____
 E. State Transporter's ID: _____
 F. Transporter's Phone: _____

9. Designated Facility Name and Site Address: U.S. ECOLOGY INC., HIGHWAY 95, 10 MILES SOUTH BEATTY, N.Y. 87003
 10. US EPA ID Number: INIVITIEI310101210101010
 G. State Facility's ID: _____
 H. Facility's Phone: (702) 553-2283

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
	No.	Type			
a. POLYCHLORINATED BIPHENYLS NA 7188 WASTE HAZARDOUS SUBSTANCE, SOLID, N.O.S., ORM-E	0011	CM	00008 TE	Y	State: CA EPA/Other: NM RLRA
b. _____					State: _____ EPA/Other: _____
c. _____					State: _____ EPA/Other: _____
d. _____					State: _____ EPA/Other: _____

J. Additional Descriptions for Materials Listed Above: A.3 CONTAMINATED SOIL WITH POLYCHLORINATED BIPHENYLS, MAXIMUM CONTAMINATION LEVEL 123 PPM, acceptance number 07-034-6495
 K. Handling Codes for Wastes Listed Above: a. _____, b. _____, c. _____, d. _____

16. Special Handling Instructions and Additional Information: Item No. 13 should read 00008 0011

18. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
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Printed/Typed Name: Tim Blith
 Signature: [Signature]
 Month Day Year: 11/03/89

17. Transporter 1 Acknowledgment of Receipt of Materials
 Printed/Typed Name: ANTONIO FIGUEROA
 Signature: [Signature]
 Month Day Year: 11/02/89

18. Transporter 2 Acknowledgment of Receipt of Materials
 Printed/Typed Name: _____
 Signature: _____
 Month Day Year: _____

19. Discrepancy Indication Space: _____

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Rem 19.
 Printed/Typed Name: _____
 Signature: _____
 Month Day Year: _____

YELLOW: GENERATOR RETAINS

From: Navy Public Works Center, Environmental Engineering Laboratory, Case 91-
Naval Air Station, North Island, Building 728, San Diego, CA 92125
(619) 437-3007

Activity CODE 6408

Type of Sample: SOIL ID: 91021

Date Sample Collected: Date Analyzed: 16 OCT 89 Analyzed: N/A Date Sample Received: 16 OCT 89

Results Expressed As: PCB IN MILLIGRAMS PER KILOGRAM (ppm)
SAMPLE IDENTIFICATION AND RESULTS

SAMPLE ID	RESULTS	SAMPLE ID	RESULTS
9286-16-YARD-01	ND		
9286-16-YARD-02	ND		
9286-16-YARD-03	ND		
9286-16-YARD-04	ND		
9286-16-YARD-05	ND		
9286-16-YARD-06	ND		
9286-16-YARD-07	ND		
9286-16-YARD-08	ND		
9286-16-YARD-09	ND		
9286-16-YARD-10	ND		
9286-16-YARD-11	13		
9286-16-YARD-12	4.6		
9286-16-YARD-13	1.4		
9286-16-YARD-14	ND		
XXXXXXXXXXXXXXXXXX NONE FOLLOWS XXX			

MARKS: ND= NONE DETECTED
DETECTION LIMIT= 1.0ppm

CREATED BY: Ret. S.W.M.
LABORATORY SUPERVISOR

DATE: 10/17/89

NAVY PUBLIC WORKS CENTER
 ENVIRONMENTAL ENGINEERING LABORATORY
 CHAIN OF CUSTODY

ACTIVITY: PWC 640 B

LAB LOG NO.:

JOB ORDER NO.: 91021-14

SAMPLE ID	SAMPLE TYPE	ANALYSIS REQUIRED	SAMPLE ID	SAMPLE TYPE	ANALY REQUI
1. 9286-16-Yard-01	Soil	PCB	20.		
2. " 02	"	"	21.		
3. " 03	"	"	22.		
4. " 04	"	"	23.		
5. " 05	"	"	24.		
6. " 06	"	"	25.		
7. " 07	"	"	26.		
8. " 08	"	"	27.		
9. " 09	"	"	28.		
10. " 10	"	"	29.		
11. " 11	"	"	30.		
12. " 12	"	"	31.		
13. " 13	"	"	32.		
14. " 14	"	"	33.		
15.			34.		
16.			35.		
17.			36.		
18.			37.		
19.			38.		

COMMENTS

RELINQUISHED BY <i>Timothy</i>	DATE/TIME 10/16/89	RECEIVED BY <i>[Signature]</i>	SEND RESULTS TO Tim
RELINQUISHED BY	DATE/TIME	RECEIVED BY	PHONE #: 67999
RELINQUISHED BY	DATE/TIME	RECEIVED BY	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CA 2170023202078619		Manifest Document No. 11/18/69		Page 1 of 1		Information in the shaded areas is not required by Federal law					
3. Generator's Name and Mailing Address Alamy Public Works Center Code 640 PO Box 113, Naval Station San Diego CA 92136						A. State Manifest Document Number 88697869							
4. Generator's Phone (619) 556-8647/7349						B. State Generator's ID M, Y, M, 0, 3, 6, - 0, 2, 1, 3, 7, 3							
5. Transporter 1 Company Name United Pumping Services, Inc.				6. US EPA ID Number ICIAID017291513171719		C. State Transporter's ID 011257							
7. Transporter 2 Company Name						D. Transporter's Phone 818/963-9326							
8. Designated Facility Name and Site Address U.S. Ecology Inc. Highway 98, 10 miles south Beatty NV 89003						10. US EPA ID Number N, V, T, 3, 3, 0, 4, 1, 0, 0, 0, 0		E. State Transporter's ID		F. Transporter's Phone			
						G. State Facility's ID				H. Facility's Phone (702) 553-2203			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit WT/Vol		1. Waste No.	
a. RG, Waste Hazardous Substance, Solid, NDS. (methylated Diphenyls) OSM-E NA 9188						01, 1 CM		00 003		Y		State 261 EPA/Other N/A RKA	
b.												State EPA/Other	
c.												State EPA/Other	
d.												State EPA/Other	
J. Additional Descriptions for Materials Listed Above A-1 - Soil contaminated with PCBs - Maximum contamination level 123 ppm Acceptance Number 07-004-6495						K. Handling Codes for Wastes Listed Above a. b. c. d.							
15. Special Handling Instructions and Additional Information A-1 Soil contaminated with PCBs - MAX. contamination 123 ppm													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name Tim Blyth						Signature 			Month Day Year 10/26/89				
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name ENRIQUE A. ORTIZ						Signature 			Month Day Year 10/27/89				
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature			Month Day Year				
19. Discrepancy Indication Space													
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.													
Printed/Typed Name						Signature			Month Day Year				

8022 A (1/88)

GENERATOR

TRANSPORTER

FACILITY

Do Not Write Below This Line

Blue: GENERATOR SENDS THIS COPY TO DOHS WITHIN 30 DAYS
 To: P.O. Box 400, Sacramento, CA 95812-0400

UTILITIES DEPARTMENT
 NAVY PUBLIC WORKS CENTER
 SAN DIEGO, CALIFORNIA 92136-5113

Spill Report No. _____

9303-01

Polychlorinated Biphenyl Spill Cleanup Sampling Report

1050

Sample Number	Sample Type		Description			RESULTS (mg/100 cm ² indicate otherwise)	Date of Analysis	Analyst Initials	
	Pre Clean	Post Clean	Location	Wipe	Liq				Solid
1214-10-01		✓	NTC yard	✓			ND	3/27/87	1/AA
" -02		✓	"	✓			ND	"	1/AA
" -03		✓	"	✓			ND	"	1/AA
" -04		✓	"	✓			ND	"	1/AA
-05									
-06									
-07									
-08									
-09									
-10									
-11									
-12									
-13									
-14									
-15									
-16									
-17									
-18									
-19									
-20									

Cleanup Performance Standard Limit Considered Clean

Surface Type	Limit	Sample No.:	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20
Water/Oil	5 ppm																					
Hard Surface																						
Station/Low Contact Outdoor	0.1 mg/100 cm ²																					
Others	0.01 mg/100 cm ²																					

Comments: ND = None Detected
detection limit = 0.02 mg

RESULTS TO: _____

CHAIN OF CUSTODY

ACTIVITY: PWC CODE 648

PROJECT NAME/NUMBER: _____ LAB LOG NO.: 91050 (TO

SAMPLE ID	DATE OF SAMPLE	SAMPLE LOCATION	CONT TYPE	SAMPLE TYPE	ANALYSIS REQUIRED	COMMENTS
9303-01	10-30-89	-16- YARD		wipe	PCB	
9303-02	10-30-89	-16- YARD		wipe	PCB	
9303-03	10-30-89	-16- YARD		wipe	PCB	
9303-04	10-30-89	-16- YARD		wipe	PCB	

SEND RESULTS TO ATTN: <u>Tim Blyth</u>		RELINQUISHED BY	DATE/TIME	RECEIVED BY
PHONE #: <u>556-7999</u>		<u>WALT</u>	<u>10-30-89 1400</u>	<u>[Signature]</u>
		RELINQUISHED BY	DATE/TIME	RECEIVED BY
		RELINQUISHED BY	DATE/TIME	RECEIVED BY

M
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ENCLOSURE