

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4

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May 29, 1996

Mr. Keith Forman
Interim BRAC Environmental Coordinator
Naval Training Center-Environmental Office
33502 Decatur Road, Suite 120
San Diego, California 92133-5000

**ADDENDUM TO THE FINAL EXTENDED SITE INSPECTION REPORT, INACTIVE
LANDFILL, NAVAL TRAINING CENTER, SAN DIEGO, CALIFORNIA**

Dear Mr. Forman:

The Department of Toxic Substances Control (DTSC) has completed review of the addendum to the Final Extended Site Inspection Report (ESI), Inactive Landfill, Naval Training Center, San Diego, California. The addendum is dated April 29, 1996 and was received by this office on May 8, 1996. The purpose of the addendum was to address the DTSC comment letter to the ESI, dated April 3, 1996. The majority of DTSC comments were regarding the ESI risk assessment and the issue of proper background methodology for the inactive landfill. Other areas in the ESI that needed to be addressed were corrections and clarifications in the report.

The issue of background methodology for inorganic chemicals remains unresolved. The Navy proposed an alternate method from the 95th upper tolerance limit, which DTSC rejected, to the 95th percentile. As was the case for the previous method, the 95th percentile method is also generally not acceptable for such a small sample population. DTSC has proposed the lower confidence limit method. However, DTSC will accept the use of the 95th percentile for the inactive landfill at Naval Training Center as proposed in your addendum for the following reasons:

- 1) The issue of background relates to inorganic chemicals in the landfill cover, rather than the landfill material itself;
- 2) The landfill material itself does not appear to present major concerns for human or ecological receptors;
- 3) The maximum levels of the six chemicals which were eliminated (aluminum, barium, chromium, cobalt, manganese, vanadium) as shown in Table 6-1 of the ESI, were well below the 95th percentile values (Attachment 1 of the Addendum) and appeared to be part of the background distributions (Attachment 1 of the Addendum); and,



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- 4) Meetings during May will be held with representatives of the Navy, DTSC, and the U.S. Environmental Protection Agency to attempt to reach a consensus on methods to be used at Naval facilities.

It should be noted that even though the Navy has proposed to abandon the upper tolerance limit and use the 95th percentile for background, this was not done in response 5B. In addition, arithmetic errors continue to be associated with the ecological risk assessment, see response 7B. The error has no impact on the conclusions of the response or the ecological assessment.

DTSC does not agree with all of the Navy responses and the issue of evaluation of background levels for inorganic chemicals remains unresolved. However, we do not believe that further discussion is warranted for this ESI. Sufficient information is available to accept the results of the ESI risk assessment. The excess cancer risk estimate exceeds 1×10^{-5} (Table 8-4 in the ESI) with most of that risk resulting from arsenic. This is based on the stringent assumptions associated with a screening risk assessment, including the assumption of a residential setting. The site provides poor habitat for most animals and plants because of the constant physical disturbance. Unless this changes, the major ecological concern appears to be to maintain the nesting area for the least terns.

We look forward to final closure of the Site 1 inactive landfill at the Naval Training Center, San Diego. If you should have any questions regarding this matter, please call me at (310) 590-5563.

Sincerely,



Alice Gimeno
Base Closure Team
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Southern California Operations

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