



Cal/EPA

Department of  
Toxic Substances  
Control

245 West Broadway,  
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90802-4444

November 27, 1996

Mr. Keith S. Forman  
Interim BEC  
Department of the Navy  
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Pete Wilson  
Governor

James M. Strock  
Secretary for  
Environmental  
Protection

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REVIEW OF RESPONSE TO COMMENTS FOR DRAFT WORKPLAN  
FOR SITE ASSESSMENT/EXTENDED SITE ASSESSMENT FOR  
POINTS OF INTEREST AT NAVAL TRAINING CENTER, SAN DIEGO

Dear Mr. Forman:

The Regional Water Quality Control Board (RWQCB), and the Department of Toxic Substances Control (DTSC), collectively known as the State, have reviewed the response to comments for the draft extended site assessment workplan for NTC's Points of Interest (POI). The State received the draft copy of the response via telefax on November 18, 1996. Based on our review, verbal comments by DTSC were provided to you and Ms. Content Arnold on November 22, 1996. Likewise, the RWQCB also provided verbal comments to Ms. Content Arnold on November 26, 1996. In order to expedite the response to comment process, Ms. Content Arnold has summarized the State's comments in an E-mail message copied to you. A copy of the E-mail message is attached for the record.

Although the State has provided comments on the draft workplan and has not received written responses or the final workplan, we concur that field work can commence based on the draft workplan and the comments provided by the State and U.S. EPA. The State requests that the Navy provide comments resolution and a final workplan as soon as possible.

Aside from the draft POI site assessment workplan review, the State is currently reviewing numerous other documents submitted by the Navy. These documents include the draft final EE/CA for the Site 1-Inactive Landfill, the draft BRAC Cleanup Plan (BCP) update, and the draft Workplan Addendum for Phase III Site Assessment at the Steam Tunnels. As discussed during our telephone conference of



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November 26, 1996, the State requests additional time for the review of these documents. As scheduled, the specified documents were all given a turn-around time of approximately 2 weeks with comments due on or before December 3, 1996. The State proposes to provide verbal comments on the revised BCP on December 3, 1996 due to the scheduled meeting, and requests an additional 2 weeks for the review of the draft final EE/CA and the workplan addendum for the Steam Tunnels.

If you have any questions regarding this letter, please feel free to contact me at (310) 590-4897.

Sincerely,



Aaron Yue  
EAR Specialist/ Interim RPM  
Base Closure and Conversion  
Office of Military Facilities

Enclosure

cc: Ms. Content Arnold  
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Mr. Martin Hausladen  
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California Integrated Waste Management Board  
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Unit Chief  
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Return-Path: <cparnold@efdswest.navfac.navy.mil>  
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by ixmail2.ix.netcom.com (8.7.5/SMI-4.1/Netcom)  
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To: <ayue@ix.netcom.com>  
Cc: <klparker@bechtel.com>,  
"Keith S Forman" <ksforman@efdswest.navfac.navy.mil>  
From: "Content P Arnold" <cparnold@efdswest.navfac.navy.mil>  
Subject: POI Response to Comments  
X-Incognito-SN: 405  
X-Incognito-Format: VERSION=2.01a ENCRYPTED=NO

Aaron:

The following is a reiteration of the verbal comments I received from you on Friday, November 22. Also included are the verbal comments received from Corey on Tuesday, November 26. All comments were in response to the "Response to Comments from Technical Review of Draft Work Plan for Site Assessment for POIs, at NTC, San Diego."

All comments have been forwarded to the contractor, Kathryn Parker, and will/have been addressed in the response to comments or work plan as appropriate. As discussed this email is just to document the receipt of additional regulatory comments.

Following are specific comments from yourself:

1. Response 4:

Reiterated concern for the high MDLs for the stated analytical methods in the draft report. Although this concern should not interfere with the commencement of field work, it will be addressed again after analytical data results are received from the lab. (This concern was discussed in a brief phone con with Aaron, Kathryn, and myself on 26 November 1996)

2. Response 12

Clarify "these areas" in the decision rules text. "These areas" notation was confusing.

Revise text to reflect rationale for trench location. Re-evaluate trench location for technical adequacy.

3. Response 17

State in text why the "other anomaly" is not of concern.

4. Response 20

Provide a figure in work plan.

5. Response 24

Delete sentence two in response, starting "In addition, as discussed in.....".

6. Response 30

Response does not address the comment adequately.

Specific comments from Corey:

1. Response 1

Corey would still like information about sewer lateral provided. Wants a sample to be taken adjacent to the lateral. Provide a sample near flammable locker.

2. Response 6

Take a "near surface sample" < 5 ft.

3. Note verbal conversation between Corey and myself in the "Response to Comments" discussing regulator notification for the Phase II sampling at POI 93.

In addition, as mentioned in the 26 November phone con, BNI can not proceed with fieldwork until a formal regulator concurrence letter is issued. My understanding is that a concurrence letter will go out today. Please fax me a copy of the letter before you send it. I appreciate your time and effort in this matter.

Happy Thanksgiving!!!!!!!

Sincerely,  
Content