



Cal/EPA

Department of
Toxic Substances
Control

245 West Broadway,
Suite 425
Long Beach, CA
90802-4444

October 17, 1996

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Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

Mr. Keith S. Forman
Interim BEC
Department of the Navy
Naval Training Center
33502 Decatur Road, Suite 120
San Diego, California 92133-1449

REVIEW OF ADDITIONAL HELP MODEL RUNS AND RESPONSE TO
RESPONSE OF COMMENTS FOR SITE 1 LANDFILL'S EE/CA, NAVAL
TRAINING CENTER, SAN DIEGO

Dear Mr. Forman:

The Integrated Waste Management Board, the Regional Water Quality Control Board, and the Department of Toxic Substances Control, collectively known as the State, have reviewed the telefax of the HELP model runs and the response to comments. In general, the State believes you have adequately addressed our comments except for the following:

1. Page 2, Response 2:

The State request the Navy to include a provision in the EE/CA for additional action or measures to be taken if the selected cap fails to adequately control landfill gas emission or infiltration. In addition, the Navy should state clearly that the City of San Diego will be responsible to conduct any additional activities if there is a change in land use based on the pending reuse plan.

2. Page 3, Response 3:

The State believes that the qualifier for the installation of a PVC membrane layer should be removed from the middle paragraph. According to your response to comment, the installation quality cannot be guaranteed; therefore, the amount of decrease in infiltration rate is not significantly lower. This statement in the response is not correct. The California Integrated Waste Management Board has promulgated membrane liner installation performance criteria and guidelines. If the guidelines are followed properly during installation, the installation quality should not be questionable.



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Finally, since the trenching activities at Area 4 demonstrated that waste were buried in the area, the State requests that a trenching report and a revised conceptual cap design for the EE/CA be submitted for review. Aside from these items, the State has no further comments on the draft EE/CA document. We request, however, a review of the EE/CA document as a whole to ensure the enclosure of accurate information prior to the State's final concurrence on the document. Please advise us of the schedule for the submission of this document.

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

cc: ✓ Ms. Content Arnold
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