

**COMMENTS ON THE DRAFT ENGINEERING EVALUATION/COST ANALYSIS  
NON-TIME CRITICAL REMOVAL ACTION FOR SITE 1  
NAVAL TRAINING CENTER, SAN DIEGO  
CTO-0056**

N00247.000427  
NTC SAN DIEGO  
SSIC # 5090.3

Comments from Cheryl Lester

**Site 1 – Inactive Landfill  
Naval Training Center, San Diego**

Cheryl Lester  
Hazardous Material Program Supervisor  
City of San Diego

Received:

**Comment 1:** In various meetings and in the EE/CA, the preferred landfill cover design (Alternative 2) type of material has been noted as a "breathable" cover for moisture evaporation. I reviewed the August 2, 1996 letter from John Anderson, Regional Water Quality Control Board, which states their issues after reviewing the EE/CA. However, I have not seen any acceptance of the EE/CA from the Air Pollution Control District (APCD) regarding landfill emissions. In many areas of the EE/CA, APCD issues were only referenced as Rule 51, nuisance issues. My understanding is that they would regulate methane and other gas emissions from the landfill

Please confirm my understanding of APCD's role in the Landfill closure process and supply any official correspondence discussing their comments on the EE/CA.

**Comment 2:** In reviewing the surface soil results, Table 2-1, the Preliminary Remediation Goals (PRGs) levels are different in value and in content than those listed in the back of the Environmental Baseline Survey for Parcels C, D, H, N, O, P. I have also done a search through our database which contains various types of EPA documents. I have been unable to find a published list of PRG's and background information on their intended use and limitations.

I would like a copy of the EPA document which states the PRGs and the rationale for their use. This original information will allow City staff to more fully understand and have confidence in these clean up standards and how they will relate to base reuse issues.

**Response 1:** The Navy received applicable or relevant and appropriate requirements (ARARs) from DTSC on 10 May 1996, which included ARARs from the APCD. All ARARs referenced in the APCD's correspondence (SD APCD Regulation II Rules 20.1, 20.2, and 20.3, and SD APCD Regulation IV Rules 50, 51, and 59) are addressed in Appendix A of the EE/CA

Since the Inactive Landfill is being closed under CERCLA, the California Integrated Waste Management Board (CIWMB) has regulatory jurisdiction over landfill gas emissions monitoring and control during closure and postclosure. As a result, gas monitoring and control (if necessary) will be performed in accordance with the California Code of Regulations, Title 14, Natural Resources, Article 17783.

**Response 2:** The PRGs are updated semi-annually. The updates include changes in chemicals listed and in numerical PRG values. A copy of the PRGs document, which includes descriptions of the PRGs, can be obtained by contacting the US EPA's NTC project manager, Martin Hausladen.

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**Comment 3:** In reviewing the water SWAT information on page 2-20, it states that “the levels of the contaminants found were not sufficient to warrant any remedial measures at that time.” The August 2, 1996 letter from the RWQCB states that if the “maintenance and erosion control measures do not improve ground water quality over a period of time, corrective action measures may need to be proposed and/or implemented by the owner of the landfill.” This statement from the RWQCB leads me to believe that they don’t find the existing levels of contaminants to be satisfactory over time. Tables 2-2 and 2-2 use the maximum concentrations found in the groundwaters below the landfill and compare them to the California Enclosed Bays and Estuaries Plan or EPA’s national ambient water quality criteria. I have searched my database for a copy of these documents and have been unable to find them.

I would like to receive a copy of the most recent California Enclosed Bays and Estuaries Plan and EPA’s nation ambient water quality criteria and related information the rational for their use. This original information will assist City staff to more fully understand how the RWQCB uses these standards, have confidence in these clean up standards, and how they will relate base reuse issues.

**Comment 4:** In evaluating the ground water contamination, certain information and assumptions must have been made to determine migration (page 2-28). Below are the questions I have regarding these conclusions.

I would like to know how fast the groundwater in Zone A & B is expected to travel in a year (i.e. 20 years after closure) the contaminated groundwater from trash deposited areas could reach the monitoring wells and the channel.

Page 2-28 states that “groundwater sample data indicates that organics detected in groundwater appear to be localized and are not indicative of any distinct organic plume.” What information was the basis for that conclusion

**Response 3.** The Extended Site Inspection (ESI) performed for the Inactive Landfill was the additional detailed investigative work performed subsequent to the Water SWAT. The ESI was performed in accordance with the requirements of the RWQCB (October 15, 1993 letter). As discussed in the ESI, three metals and one VOC exceeded their respective water quality criteria in at least one well at the Inactive Landfill. The Water SWAT did not include comparison of groundwater samples to water quality criteria.

In accordance with closure requirements (refer to 14 CCR Section 17782 and CCR 23, Chapter 15, Section 2581), a groundwater monitoring program will be implemented for the Inactive Landfill. The referenced August 2, 1996 comment was regarding the groundwater monitoring program described in the Engineering Evaluation/Cost Analysis (EE/CA) for the ESI. It should be noted that considerable additional data collection and evaluation has been performed since the Water SWAT was conducted.

A copy of the state document can be obtained by contacting the RWQCB’s NTC project manager, Corey Walsh. As noted in response 2, EPA documents can be obtained by contacting Martin Hausladen.

**Response 4.** Data and evaluations regarding groundwater flow, potential for contaminant migration and potential for impact to the boat channel, distribution of contaminants based on groundwater samples, and interpretations of plume extent are contained in Sections 6.4.3, 6.4.4, 6.4.5, 6.5.2, and 9.1.3 of the Final ESI for the Inactive Landfill.

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(statistically, well placement, channel contamination)? Explain how the detection of 1,4-Dichlorobenzene at Well ES-1s and ES-1D, which correspond to where refuse trenches exist, is not considered an indication of a vertical or horizontal plume?

**Comment 5:** In reviewing the monitoring well locations and numbers, the EE/CA states that there are 18 wells (page 2-27). After looking at the corresponding tables, I count only eleven distinct locations.

Please describe where the 18 monitoring well are located. If one well will be used to sample Zone A and B, please describe how that will be done and how cross contamination does not occur.

**Comment 6:** On page 2-29 clarification is needed on the conclusion that Zone A's lower total dissolved solids is due to infiltration of fresh water from the surface. (if that was so, would not migration of the contaminants from the cover soil be detected in Zone A?) Why was a fresh water source underground discounted as responsible for the dilution? How does this information in general suggest that there is no significant amounts of leachate originating from the landfill?

**Comment 7:** The landfill will comprise of open space area as presently designed. What stormwater requirements pertain to the landfill in regards to erosion or leaching of the contaminants from the surface soils to the surface water? Is an NPDES permit, surface runoff testing or a SWPPP required?

**Response 5:** Figures 2-13 and 2-14 show both shallow and deep wells, which together total of 24 wells. Eighteen of these wells were installed during the ESI investigation. Figure 5-6 in the Final ESI indicates the locations of all wells that were sampled.

The Zone A and B wells were screened exclusively in each respective zone. Well construction details and the groundwater zones are discussed in Sections 6.4.1 and 6.4.2 of the Final ESI.

**Response 6:** Sections 6.4.1, 6.4.3, 6.4.5, and 6.5.2 in the Final ESI discuss groundwater flow (horizontally, and vertically between zones), groundwater recharge and discharge, and landfill leachate.

**Response 7:** Any permitting requirements, as appropriate, will be addressed during engineering design of the landfill cover. This design will include runoff collection and discharge from the cap. The cap will be comprised of "clean" soils which will be placed on top of the existing surface soils ensuring that a minimum of 3 feet exists on top of any waste material.

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**Comment 8:** The August 2, 1996 letter from the RWQCB on page 3, section 2 states “at this time, we do not concur that it will be necessary for the Navy to implement this proposed portion of the monitoring program.” I would like to have clarification whether the RWQCB has decided that the groundwater contamination merits construction of a Chapter 15 final cover, installation and operation of a gas collection system or other measures. If the RWQCB decides not to require these actions presently, a written explanation which determines the triggers which will require these actions is needed.

**Comment 9:** The RWQCB’s letter also states on page 4 in the conclusion that “if impairment of beneficial uses of water is found, the owner/operator may be required to further evaluate and correct water quality impacts.” Clarification is needed on what quantitative levels and types of contaminants are considered an “impairment” and what water is considered “beneficial”, since the owner and previous operator will be different upon conveyance of the property, who will be responsible for these corrective actions.

**General:** Another concern in regards to this landfill is focused around this remediation action and reuse issues. My understanding is that official reuse plan depicts the Navy conveying landfill parcel to three separate owners, the Port Authority, Fish and Wildlife, and the City of San Diego. How will the

**Response 8:** It is recognized that there is minimal and generally acceptable risk to humans and the environment from the landfill **at the present time**, however, the Navy has chosen to **ensure** that potential future exposure is minimized. The purpose of the removal action is to reduce the potential for human or ecological exposure to the potentially contaminated landfill wastes, to reduce the potential for the generation of leachate due to percolation of precipitation, and to reduce potential landfill gas generation.

As part of landfill closure, groundwater monitoring will be conducted in accordance with CCR Title 23, Chapter 15, Section 2581, and landfill gas monitoring will be conducted in accordance with the California Code of Regulations, Title 14, Natural Resources, Article 17783. New Sections 4.2.1 and 4.2.2, respectively, will describe the monitoring and conditions under which additional actions will be taken.

**Response 9.** Refer to the response to Comment 8 regarding monitoring. Beneficial/non-beneficial uses are described in Section 3 of the ESI. Since groundwater in the region of NTC has been classified by the California RWQCB as having no beneficial uses, the health risks presented by COPCs in groundwater were assessed by comparing them with water quality objectives unidentified in the California Enclosed Bays and Estuaries Plan and the federal ambient water quality criteria. Action levels for groundwater are discussed in New Section 4.2.1.

In the EE/CA, the Navy is committed to continuing the Inactive Landfill area as non-irrigated open space. An evaluation of the risk associated with any proposed uses of the landfill other than non-irrigated open space will be the responsibility of future land owners.

**Response:** As stated in the previous response, the EE/CA is based on the Navy’s commitment to continuing the landfill area as non-irrigated open space. Once the land is transferred, the evaluation of risk associated with other proposed uses will need to be evaluated by each future land owner for

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regulators allow only portions of the landfill to have a “change in use” which will disrupt the cap design

Navy staff has stated that there will be title conditions for this parcel, however these conditions will spread over three owners which could make the property logistically unusable since the cap design did not take into consideration reuse issues and each owner has no requirement to complement the others reuse considerations.

that portion of the landfill.

The reuse plan is still being developed. However, it appears at this time that the entire parcel may be transferred to the San Diego Port Authority.