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Pete Wilson
Governor

EPA

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San Diego
Regional Water
Quality Control
Board

December 6, 1996

Commanding Officer
Naval Training Center
33502 Decatur Road, Suite 120
San Diego, CA 92133-1449

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Rd. Suite A
San Diego, CA 92124
(619) 467-2952
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Dear Sir:

**RE: FINAL ENGINEERING EVALUATION/COST ANALYSIS (EE/CA)
NON-TIME CRITICAL REMOVAL ACTION FOR SITE 1 INACTIVE
LANDFILL, NAVAL TRAINING CENTER (NTC), SAN DIEGO**

The Regional Water Quality Control Board (RWQCB) has completed our review of the above referenced "working draft" document, dated November 1996. The document was prepared by Bechtel National, Inc. on behalf of Southwest Division Naval Facilities Engineering Command (SWDIV) in accordance with contract task order CTO-0056/0235. The purpose of the EE/CA is to identify and analyze alternative containment actions which will reduce the potential for human and ecological exposure to landfill wastes, to reduce potential for development of leachate, and to reduce landfill gas generation. The RWQCB concurs with the EE/CA recommendation of the "alternative 2" cover design (single layer cover) for the current post-closure land use. Based on our review we have the following comments.

GENERAL COMMENTS

The RWQCB does not concur with the proposed use of a "tidal mixing factor" as an indicator that corrective action would be required, but will continue to evaluate the ongoing groundwater monitoring program data to determine when corrective action may be necessary to prevent impacts to the beneficial uses of San Diego Bay.

California Business and Professions Code Sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgements be performed by or under the direction of registered professionals. Please remind your consultants that all appropriate technical reports must bear the stamp or signature (including license number) of all the appropriate registered professionals. Geologic boring and trench logs must also bear the stamp or signature of a California registered geologist (RG) or certified engineering geologist (CEG) in order to verify proper supervision and to establish responsibility. This is in accordance with the Business and Professional Code, Chapter 12.5 - Geologist and Geophysicists Act Section 7800 et. seq.

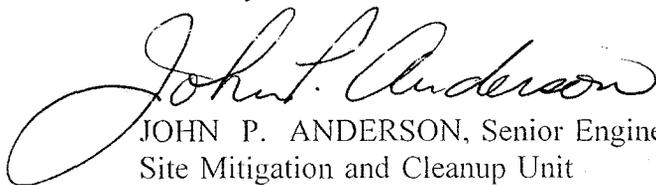
SPECIFIC COMMENTS

1 Page 4-21 Section 4.3.1, Effectiveness

Typographic error "using a 3-percent slope" should be changed to "using a 0.5-percent slope".

Please contact Corey Walsh at (619) 467-2980 if you have any questions regarding this letter.

Sincerely,



JOHN P. ANDERSON, Senior Engineering Geologist
Site Mitigation and Cleanup Unit

JPA:cmw d:\docs\dod-ntc\ec_cafin.ltr

FILE: 30-0092.N02

cc:

Mr. Aaron Yue, Base Closure Team, Office of Military Facilities,
Department of Toxic Substances Control, 245 West Broadway, Suite
425, Long Beach, CA 90802-4444

Mr. Keith Forman, Interim BRAC Environmental Coordinator, NTC-
Environmental Office, 33502 Decatur Road, Suite 120 San Diego, CA
92133-1449

Ms. Content Arnold (Code 1832.CA) Remedial Project Manager,
Southwest Division Naval Facilities Engineering Command, 1220 Pacific
Highway, San Diego, CA 92132-5190

Mr. Martin Hausladen, U.S. EPA, Region IX, (H-9-2), Hazardous Waste
Management Division, 75 Hawthorne Street, San Francisco, California
94105-3901