

RESPONSE TO COMMENTS
DRAFT BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP) UPDATE #4
for FORMER NAVAL TRAINING CENTER, SAN DIEGO, CA
CTO-0159

Originator: Content P. Arnold SWDIV	Date received: 4 February 1998
<u>COMMENTS</u>	<u>RESPONSES</u>
1. Page 3-1, Section 3.1, 1 st ¶, last sentence. This sentence is awkward; reword.	RESPONSE 1: Comment incorporated.
2. Page 3-2, Section 3.1.1, 1 st ¶, 4 th sentence. Does the word "implementation" imply that the soil cap will be executed at the landfill? Perhaps we should use more appropriate wording.	RESPONSE 2: Comment incorporated. "Implementation" has been changed to "consideration".
3. Page 3-2, Section 3.1.1, Site 01. a) Change date of operation to be consist with other documents to "approximately 1950." b) Let's use wording from ETA fact sheet when discussing the "334 transfer process".	RESPONSE 3: Comment incorporated.
4. Page 3-7, Section 3.1.1, Site 15. The SA/ESA report has not been finalized. Make appropriate changes throughout document.	RESPONSE 4: Comment incorporated.
5. Page 3-7, Section 3.1.2, 2 nd ¶. Should we summarize the purpose of Table 3-2 and discuss why it is not applicable this year for the new BCP readers?	RESPONSE 5: Comment incorporated. An explanation of why the table is not applicable has been provided.
6. Page 3-8, Section 3.1.2, 1 st incomplete sentence on page. All POI field work was completed in 1997.	RESPONSE 6: Comment incorporated.
7. Page 3-9, Section 3.1.2 POI 08, POI 13, POI 26 and POI 58. Add rationale for FA determination to be consistent with other POI descriptions.	RESPONSE 7: Comment incorporated.
8. Page 3-12, Section 3.1.2, POI 38. The sediment removal was completed in early January 1998. Must change this POI to FA category.	RESPONSE 8: Comment incorporated.

RESPONSE TO COMMENTS
DRAFT BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP) UPDATE #4
for FORMER NAVAL TRAINING CENTER, SAN DIEGO, CA
CTO-0159

Originator: Content P. Arnold SWDIV	Date received: 4 February 1998
<u>COMMENTS</u> <p>9. Page 3-17, Section 3.1.2, POI 29. Soil was supposed to be excavated prior to demolition; however, no records have been found to confirm this excavation. See SA/ESA for previous investigation summary.</p>	<u>RESPONSES</u> <p>RESPONSE 9: Comment incorporated.</p>
<p>10. Page 3-18, Section 3.1.4, Site 01. Surface maintenance should not be referred to as a removal action. Delete Site 01 from early actions status section.</p>	<p>RESPONSE 10: Comment incorporated.</p>
<p>11. Page 3-28, Section 3.1.4, Site 01. POI 14 should be identified as area type 2 and POI 16 should be identified as area type 3. Make appropriate changes throughout document.</p>	<p>RESPONSE 11: Comment incorporated.</p>
<p>12. Page 3-32, Section 3.4.8, last. Pursuant to a 27 January 1998, groundwater meeting, status of installation groundwater issue needs further discussion with BCT.</p>	<p>RESPONSE 12: Comment incorporated.</p>
<p>13. Page 3-35, Table 3-1. For the soil medium, a quantitative human-health risk screening was performed as part of the SA/ESA. This information should be included in the "Risk to Human Health and Environment" column. See SA/ESA for details.</p>	<p>RESPONSE 13: Comment incorporated.</p>
<p>14. Page 3-73, Table 3-12. Changes in Section 3.4.1 should be reflected in this table.</p>	<p>RESPONSE 14: Comment incorporated.</p>
<p>15. Page 3-77, Figure 3-1. The boundary for Site 01 is incorrect.</p>	<p>RESPONSE 15: Comment incorporated.</p>

RESPONSE TO COMMENTS
DRAFT BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP) UPDATE #4
for FORMER NAVAL TRAINING CENTER, SAN DIEGO, CA
CTO-0159

Originator: Content P. Arnold SWDIV	Date received: 4 February 1998
<u>COMMENTS</u>	<u>RESPONSES</u>
16. Page 3-79, Figure 3-2a, Notes. Is it appropriate to add rationale for not including POIs 2,3,4,38,40, and 41 in figure? Let's discuss.	RESPONSE 16: Comment incorporated. Notes have been amended to indicate that these "non-geographic" POIs are found basewide and are therefore not shown on the figure.
17. Page 3-89 to 3-91, Figures 3-6 and 3-7. Discussion of installation groundwater status may change figures. In figure 3-7 please add the following wording to legend: Area Suitable for transfer <i>by Deed</i> and Area Unsuitable for Transfer <i>by Deed</i> .	RESPONSE 17: Comment incorporated.
18. Page 4-2, Section 4.1.4. Is it appropriate to discuss ETA at Site 01 in this section or does it purely refer to remedial actions?	RESPONSE 18: This section is limited to discussion of remedial/removal actions as early transfer is not an "early action".
19. Page 4-4, Section 4.1.6, Site 01. Site 01 wording needs to be changed per meeting discussion.	RESPONSE 19: Comment incorporated.
20. Page 4-5, Section 4.1.6, Site 15. The SA/ESA was not finalized.	RESPONSE 20: Comment incorporated.
21. Page 4-17, Table 4-4. Change the completion date for landfill maintenance starting in August 1997 to TBD.	RESPONSE 21: Comment incorporated.
22. Page 5-1, Section 5.1, 2 nd ¶. The removal process notes the performance of an ESA, the terminology should be ESI (Extended Site Investigation).	RESPONSE 22: Comment incorporated.
23. Page 5-7, Schedule. Site 01 and POI schedules (General, 29, and 38) need to be updated.	RESPONSE 23: Comment incorporated.
24. Appendix C. This appendix needs to be reviewed for completeness. A few regulator letters are missing.	RESPONSE 24: Comment incorporated. Regulator letters were added as provided and were ordered and identified for ease of reference.

RESPONSE TO COMMENTS
DRAFT BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP) UPDATE #4
for FORMER NAVAL TRAINING CENTER, SAN DIEGO, CA
CTO-0159

Originator: Martin Hausladen USEPA	Date received: 28 January 1998
<u>COMMENTS</u>	<u>RESPONSES</u>
1. Please change "former NTC" to "the former NTC" throughout the document.	RESPONSE 1: Comment incorporated.
2. There are various markups throughout my copy of the draft document, particularly in Chapter 1, Section 1.4 (1.4.1, 1.4.2). Please make changes as discussed at the BCT meeting.	RESPONSE 2: Comments marked in text incorporated as indicated.

RESPONSE TO COMMENTS
DRAFT BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP) UPDATE #4
for FORMER NAVAL TRAINING CENTER, SAN DIEGO, CA
CTO-0159

<p>Originator: Theodore Olson UST Program Manager, City of San Diego</p>	<p>Date received: 10 February 1998</p>
<p><u>COMMENTS</u></p> <p>1. Page 1-5, Section 1.3. The BCP Project Team has changed with the designation of the RWQCB as the lead California Agency and the Cal-EPA representative being taken off the team. The change should be noted.</p>	<p><u>RESPONSES</u></p> <p>RESPONSE 1: The change is effective 1 January 1998 and is so noted in the draft document on page 1-5, Section 1.3, last paragraph, last sentence (see also page 3-1, 2nd paragraph). A sentence was added to page 1-5, Section 1.3, last paragraph, to clarify 1998 BCT membership. In 1997 (the calendar year the document addresses), however, DTSC was still the state lead agency.</p>
<p>2. Page 3-8, Section 3.12. POI 4: In December 1997 and January 1998 City staff performed reinspections of buildings 286, 287, 288, 298, and 499. The purpose was to clearly identify all asbestos and lead materials that would be required to be removed prior to demolition. The reinspection brought to light many discrepancies between the City's findings and the Navy's findings. The City reinspection found Asbestos Containing Material (ACM) in Building 499 where it was not found by the Navy. In light of the discrepancies found, this raises questions as to the accuracy of all asbestos and lead assessments performed by the Navy. I strongly recommend that the Navy's ACM policy be readdressed to allow the Navy to perform ACM abatement <u>after</u> the time of property transfer if additional friable, accessible or damaged (FAD) asbestos is found.</p>	<p>RESPONSE 2: Please refer to the attached letter, dated 16 April 1998, addressed to you from the NTC BEC, Keith Forman.</p>

RESPONSE TO COMMENTS
DRAFT BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP) UPDATE #4
for FORMER NAVAL TRAINING CENTER, SAN DIEGO, CA
CTO-0159

<p>Originator: Charles B. Bishop NTC RAB Member</p>	<p>Date received: 13 April 1998</p>
<p><u>COMMENTS</u></p> <p>1. The document certainly provides a thorough coverage of the IRP program, and represents a considerable effort by the BCT and the contractors. Overall, I think that it does a good job of providing the necessary information to the participants and the community. For the latter, however, considerable interpretation and explanation is needed. The inherent complexity of the process makes it difficult for the average citizen to comprehend the analyses of the issues involved and for those of us who are engaged in the work or its review to explain it simply.</p>	<p><u>RESPONSES</u></p> <p>RESPONSE 1: Thank you for your comment. We agree that one of the greatest challenges we face is presenting complex data in an understandable, straightforward manner.</p>
<p>2. With that in mind, I recommend that the BCT arrange for presentations to representative local community groups as each parcel of property is identified as being suitable for transfer (Sect. 6.16). In addition to focusing on potential property use, this would break the problem up into smaller pieces which should be easier to comprehend than trying to digest the entire program in one sitting. The information provided should cover the sites and POIs included in each parcel which are Area Type 4 or higher, explain that the problems were, and how they were resolved so that there remains no threat to community health and safety.</p>	<p>RESPONSE 2: Thank you for your comment. The Navy's Base Transition Coordinator (BTC), LCDR Baker, has been addressing local community groups concerning progress on former NTC disposal and conveyance issues. LCDR Baker is transferring and his replacement, Keith Forman, will add BTC duties to his role as BEC and will continue the practice of addressing local community groups. In addition, reuse status updates are provided at RAB meetings, and RAB members are encouraged to convey this information to their respective groups and organizations. Further, as parcels are identified for transfer, Findings of Suitability to Transfer (FOSTs) -- the Department of Defense's mechanism for documenting parcels of real property which are environmentally suitable for transfer by deed under Section 120(h) of CERCLA -- are made publicly available for review and comment. The FOST incorporates previous environmental investigation information and sets forth the environmental status of the parcel(s).</p>

RESPONSE TO COMMENTS
DRAFT BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP) UPDATE #4
for FORMER NAVAL TRAINING CENTER, SAN DIEGO, CA
CTO-0159

<p>Originator: Charles B. Bishop NTC RAB Member</p>	<p>Date received: 13 April 1998</p>
<p><u>COMMENTS</u></p> <p>3. The following specific comments are submitted:</p> <ul style="list-style-type: none"> • 3.2.11 and 4.2.11 -- has the lead-based paint issue been resolved? What do the options involve? • 3.4.8 -- the extent of additional groundwater investigation required is not understood. • 4.2.5 -- what happens to "inaccessible structures" containing FAD that are not demolished before closure? 	<p><u>RESPONSES</u></p> <p>RESPONSE 3:</p> <ul style="list-style-type: none"> • The issue of lead-based paint (LBP) in soil around buildings at former NTC has not been resolved between the Navy and the regulators. USEPA and the Department of Defense (DoD) have jointly developed language to be included in FOSTs that addresses each position. Recently, USEPA and DoD have agreed to form a working committee to develop future guidelines concerning LBP. The committee's recommendations will be forthcoming in the summer of 1998. Concerning LBP in residential structures at former NTC, a final document by Public Works Center San Diego detailing the condition of LBP in Quarters A-D was recently released. The Navy is reviewing this LBP survey and will complete any maintenance/ abatement actions to comply with the 1992 LBP Hazard Reduction Act. • This additional investigation at former NTC includes, in the form of a Technical Memorandum, a groundwater contour map, a groundwater gradient map, an overlay of all applicable investigation results from groundwater monitoring wells, and a technical groundwater evaluation. This will provide the public, the Navy, the Local Redevelopment Authority (LRA), and the regulators with the "big picture" of the nature of groundwater underlying former NTC. This characterization of groundwater will provide a foundation for subsequent FOSTs for former NTC property. • These structures will remain properly secured and inaccessible to the public. The LRA (City of San Diego) will either demolish the structures or perform asbestos abatement if a future use for the building(s) is found prior to conveyance or scheduled demolition.

RESPONSE TO COMMENTS
DRAFT BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP) UPDATE #4
for FORMER NAVAL TRAINING CENTER, SAN DIEGO, CA
CTO-0159

<p>Originator: Charles B. Bishop NTC RAB Member</p>	<p>Date received: 13 April 1998</p>
<p><u>COMMENTS</u></p> <ul style="list-style-type: none"> • Table 4.4 shows that all Navy-funded BRAC projects will be completed by April 1998 except for Site 3. Sect. 4.1.6 and Fig. 5-1 list a numbers of sites and POIs that are scheduled for action after April 1998. This apparent difference is not understood. • 6.5.3 -- rather than take "residential use" as the criterion for risk assessments, why not take the projected use from the City's plan? Isn't "residential use" the most demanding and the least likely use for most of the property under investigation? 	<p><u>RESPONSES</u></p> <ul style="list-style-type: none"> • Table 4-4 shows historical and ongoing BRAC-funded projects. Figure 5-1 shows future BRAC-funded activities that are scheduled as of 12/31/97. • Yes, residential use is the most conservative reuse scenario. However, at this time the City of San Diego has not adopted an approved, final reuse plan. Therefore, as noted in the text, in the <i>absence</i> of an identified land-reuse option, "residential" is a default assumption. This conservative approach is consistent with the way DoD handles BRAC properties.



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE PROGRAM OFFICE
SOUTHWEST DIVISION, NAVAL FACILITIES ENGINEERING COMMAND
1420 KETTNER BOULEVARD, SUITE 507
SAN DIEGO, CALIFORNIA 92101-2404

5090
Ser ENV/0069
16 Apr 98

Mr. Theodore Olson
City of San Diego
Environmental Services Department
9601 Ridgehaven Court, Suite 320
San Diego, CA 92123-1636

Dear Mr. Olson:

Thank you for your letter dated February 2, 1998 with comments on the draft BRAC Cleanup Plan (BCP) for former Naval Training Center, San Diego.

Your first comment referred to changing the designation of the Regional Water Quality Control Board to reflect its new position as the lead state agency on the BRAC Cleanup Team. This has been incorporated into the document after mentioning that the change is effective January 1, 1998, while the BCP is a "snapshot" progress report as of December 31, 1997.

Your second comment concerned Point of Interest 4: buildings at former NTC with asbestos containing materials (ACM). You noted that the City of San Diego performed reinspections of five buildings and found differences between the City's findings and those stated in the Navy's basewide asbestos survey. This raised the issue of the accuracy of asbestos assessments performed by the Navy.

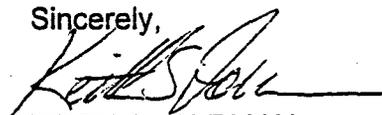
The former Naval Training Center basewide asbestos survey was completed in four phases over a seven year period from 1988 to 1995. It is not surprising that over time the condition and content of the ACM has changed in some locations. In accordance with Department of Defense policy, the Navy is required to inspect buildings with ACM during the post-closure/pre-conveyance period. This requirement ensures that the basewide asbestos survey remains accurate. In April 1998, former NTC will have been operationally closed for one year and the Navy will be performing a revalidation survey of buildings with ACM. The revalidation survey includes all buildings with ACM -- even those currently proposed for demolition after conveyance. The City of San Diego will be receiving three copies of this survey as it becomes available in May 1998.

Your comments also addressed lead-based paint (LBP) assessments at former NTC. As you know, the Navy has followed DoD policy in regards to full disclosure of buildings where LBP is suspected. A comprehensive table in the BCP lists buildings where LBP is known or suspected to be present based on the year constructed. The specific requirements promulgated in the 1992 Lead-Based Paint Hazard Reduction Act (eg., a surface-by-surface interior/exterior examination, documentation of thickness and condition of the paint) apply to "target" housing. The former NTC has four structures (senior officer housing known as Quarters A-D) which meet the definition of "target" housing. These have been properly surveyed by Public Works Center, San Diego. A

report released in November 1997 documents the condition of the LBP. Copies of this document have been ordered and three copies have been reserved for the City of San Diego. You should receive these in May 1998.

If you have further questions, please contact me at (619) 524-1022. Thank you again for your comments on the former NTC BRAC Cleanup Plan.

Sincerely,



KEITH S. FORMAN

BRAC Environmental Coordinator
By direction of the Commander

Copy to:
City of San Diego
NTC Reuse Project Director
Attn: Ms. Betsy Weisman
202 C Street, 4th Floor
San Diego, CA 92101



BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-92-D-4670

Document Control No. 0159/0021

File Code: 0324

TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 57CS1.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA. 92132-5190

DATE: April 29, 1998
CTO #: 0159
LOCATION: NTC, San Diego

FROM: [Signature] Program / Project Manager Operations Manager

DESCRIPTION: Response to Comments on Draft BCP Update #4 for Former NTC San Diego dated March 1998

TYPE: Contract Deliverable [X] CTO Deliverable Change Notice/Project Note
Other

VERSION: Draft REVISION #:
(e.g., Draft, Draft Final, Final, etc.)

ADMIN RECORD: Yes [1/2] [X] No Category Confidential

SCHEDULED DELIVERY DATE: N/A ACTUAL DELIVERY DATE: 4/29/98

NUMBER OF COPIES SUBMITTED: 0E/8C/8E

COPIES TO (Include Name, Navy Mail Code, and No. of Copies):

Table with 3 columns: SWDIV, BECHTEL, OTHER. Lists names and codes for distribution.

* Transmittal Only
1/ If "Yes" copy C. Potter

Date/Time Received

Bechtel

401 West A Street
Suite 1000
San Diego, CA 92101-7905

CLEAN II Program
Bechtel Job No. 22214
Contract No. N68711-92-D-4670
File Code: 0324

IN REPLY REFERENCE: CTO-0159/0021

April 29, 1998

Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 57CS1.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA 92132-5190

Subject: Response to Comments on Draft Base Realignment and Closure (BRAC) Cleanup Plan (BCP) Update #4 for Former Naval Training Center San Diego

Dear Mr. Selby:

Enclosed are eight copies of the Response to Comments on the Draft BCP Update #4 for distribution to SWDIV, as shown on the distribution list. Copies of this Response to Comments are being forwarded to other BCP Project Team members, City of San Diego, and Restoration Advisory Board (RAB) members.

This Response to Comments addresses comments received from the Navy, regulators, City of San Diego, and RAB members on the 14 January Draft BCP Update #4. Several of the responses were developed in close coordination with the Navy. Some of the comments were received after the document was finalized, but do not require amending the final document.

This completes our deliverables for this CTO. Technical closeout is scheduled for 30 April. If further information is required, please contact me at (619) 687-8795 or Betty Schmucker at (619) 687-8771.

Very truly yours,



Jerald F. Bailey
Project Manager

JFB:dc



Bechtel National, Inc. Systems Engineers-Constructors