

RESPONSE TO NAVY COMMENTS
DRAFT BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP) UPDATE #5
for FORMER NAVAL TRAINING CENTER, SAN DIEGO, CA
CTO-0182
10 March 1999

<p>Originator: Corey Walsh Regional Water Quality Control Board (RWQCB)</p>	<p>Date received: 11 February 1999 (verbal comments received at BRAC Cleanup Team meeting)</p>
<p><u>COMMENTS</u></p> <p>1. Make sure that Site 3 and POI 13 are included as current NTC activities, since the [Marine Corps Recruit Depot] transfer has only been approved and not completed yet.</p>	<p><u>RESPONSES</u></p> <p>RESPONSE 1: Comment incorporated. The tanks at Site 3 have been added to Table 3-7 and Table 3-8, and Section 3 mentions the status of Site 3 as not yet transferred. POI 13 was moved from "No Further Action POIs" to "POIs Recommended for Further Action" because POI 13 still belongs to former NTC.</p>
<p>2. Page 2-11: Was the existing easement for the sewer on Camp Nimitz Property modified as a result of the North Metro Sewer Interceptor Tunneling project?</p>	<p>RESPONSE 2: The 50-year easement for the North Metro Interceptor Project was added to Table 2-2, Existing Legal Agreements.</p>
<p>3. Page 3-2: Delete "Removed" from the title of Site 8.</p>	<p>RESPONSE 3: Comment incorporated here and wherever Site 8 is mentioned.</p>
<p>4. Section 3.2.7: Should the landfill be identified as a SWMU [Solid Waste Management Unit]? It might meet the RWQCB's definition of a SWMU.</p>	<p>RESPONSE 4: According to the Resource Conservation and Recovery Act (RCRA), a SWMU is defined as "any waste management unit at a RCRA facility from which hazardous constituents may migrate, regardless of whether the units were intended for the management of solid and/or hazardous waste; and/or any associated area of a facility that has become contaminated with hazardous wastes or hazardous constituents as a result of routine, systematic, or deliberate discharges from process areas." Site 1 never was a RCRA facility nor had a RCRA facility permit. Further, all Applicable or Relevant and Appropriate Requirements (ARARs) have been evaluated in the Engineering Evaluation/Costs Analysis (EE/CA) for Site 1 and will be the same, whether or not Site 1 is a SWMU.</p>
<p>5. Page 3-14. The RWQCB will provide specific language regarding storm water [see below].</p>	<p>RESPONSE 5: Comment acknowledged.</p>

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<p>Originator: Corey Walsh Regional Water Quality Control Board</p>	<p>Date received: 19 February 1999 (written comments received from RWQCB)</p>
<p><u>COMMENTS</u></p> <p>1. Chapter 3, Page 3-12, Section 3.2.3, Solid Waste Management. Please replace the current paragraph with the following paragraph: "The California Regional Water Quality Control Board-San Diego Region (RWQCB) considers former NTC to be currently regulated by Order No. 97-11, General Waste Discharge Requirements for Post-Closure Maintenance of Inactive Landfills. The RWQCB found the Navy to be in violation of Order No. 97-11 for failure to submit semi-annual monitoring reports, due October 1997 and April 1998. For this reason, a Notice of Violation was issued to the Navy on May 1, 1998. The Navy submitted the required Maintenance Completion report; Semiannual Groundwater Monitoring Report on June 22, 1998, and subsequent Annual Maintenance Completion Report; Annual Groundwater Monitoring Report on December 16, 1998. The RWQCB currently considers the facility to be in compliance with Order No. 97-11."</p>	<p><u>RESPONSES</u></p> <p>RESPONSE 1: Comment incorporated; however, this paragraph was added to the existing text.</p>
<p>2. Chapter 3, Page 3-14, Section 3.2.8, Stormwater. Please replace the current "Stormwater" paragraph with the following paragraph: "The California Regional Water Quality Control Board-San Diego Region (RWQCB) considers the former NTC to be currently regulated by Order No. 97-03-DWQ, the statewide Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Including Construction Activities (General Industrial Storm Water Permit). The RWQCB found the Navy to be in violation of Order No. 97-03-DWQ for failure to submit the 1997/98 Annual Report, due July 1, 1998. For this reason, the Notice of Violation was issued to the Navy on November 6, 1998. To date the Navy has failed to submit the required report."</p>	<p>RESPONSE 2: Comment incorporated; however, this paragraph was added to the existing text and wording was added to indicate that the Navy holds a different viewpoint on the need for a permit because the Navy feels that no industrial activity is occurring on former NTC that would require such a permit. Further, wording was added to indicate that the Navy and RWQCB are working to resolve this issue.</p>

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<p>Originator: Martin Hausladen U.S. Environmental Protection Agency</p>	<p>Date received: 11 February 1999 (verbal comments received at BRAC Cleanup Team meeting)</p>
<p><u>COMMENTS</u></p>	<p><u>RESPONSES</u></p>
<p>1. Front matter, Distribution page: Add RAB to the distribution list.</p>	<p>RESPONSE 1: Comment incorporated.</p>
<p>2. Page 3-29, Table 3-1: Under Site 15, add all projected reuse alternatives from the Reuse Plan. Include the live-work space option.</p>	<p>RESPONSE 2: Comment incorporated; "potential live/work space" was added for Site 15 under the "Comments" column (however, please note that this was not mentioned in the Reuse Plan).</p>
<p>3. Table 1-1, Page 1-11: Various changes. Delete Judith Winchell and replace her with John Hamell. Change Mark Alpert's area code to 619. Delete Richard Gilb; replace with Gino Yekta.</p>	<p>RESPONSE 3: Changes incorporated.</p>

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<p>Originator: Betsy Weisman City of San Diego</p>	<p>Date received: 11 February 1999 (verbal comments received at BRAC Cleanup Team meeting)</p>
<p><u>COMMENTS</u></p> <p>1. Page ES-2 and Table 2-3: Delete Modification 8.</p>	<p><u>RESPONSES</u></p> <p>RESPONSE 1: Comment incorporated. Reference to eight modifications to the Master Lease was changed here and elsewhere in the document to seven modifications.</p>
<p>2. Page 1-19, Table 1-5. How was this table created? Was a title search done?</p>	<p>RESPONSE 2: The information for this table was taken from data available to the Cadastral group. No title search was done. The information is documented by a Record of Survey which has been signed by a registered surveyor. The information on Table 1-5 will be used to assure that all Navy interests are being transferred. The Navy will transfer the property via a Quit Claim Deed.</p>
<p>3. Page 3-17, Section 3.3.3. Delete "San Diego Bay" [from the discussion of surface water at former NTC].</p>	<p>RESPONSE 3: Comment incorporated.</p>
<p>4. Page 3-18 and Page 4-9: Verify that no determination of cultural significance has been made on the trash deposit adjacent to Building 227.</p>	<p>RESPONSE 4: The Navy made a recommendation of no cultural significance for the trash deposit adjacent to Building 227. The Navy is awaiting concurrence from the State Historic Preservation Officer (SHPO) on that recommendation. The cited BCP sections have been amended to reflect this.</p>

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<p>Originator: Sylvia Castillo City of San Diego</p>	<p>Date received: 11 February 1999 (verbal comments received at BRAC Cleanup Team meeting)</p>
<p><u>COMMENTS</u></p> <p>1. Page 3-29, Table 3-1. Revise "Status" column for Site 1. Include revision of the EE/CA, semiannual groundwater monitoring, annual maintenance.</p>	<p><u>RESPONSES</u></p> <p>RESPONSE 1: Comment incorporated. Status for Site 1 now indicates pursuing early transfer, revising EE/CA, semiannual groundwater monitoring and annual cap maintenance conducted.</p>

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<p>Originator: Cheryl Lester City of San Diego</p>	<p>Date received: 11 February 1999 (verbal comments received at BRAC Cleanup Team meeting and in writing)</p>
<p><u>COMMENTS</u></p> <p>1. Page 2-13: says modification 8 to the master lease was approved in 1998 (not true).</p>	<p><u>RESPONSES</u></p> <p>RESPONSE 1: Comment incorporated. Reference to eight modifications to the Master Lease was changed here and elsewhere in the document to seven modifications.</p>
<p>2. Page 4-4 says the 334 Landfill package is ready in January 99? If so let's get a copy.</p>	<p>RESPONSE 2: The draft 334 package is expected to be out for review in April 1999 and the BCP has been changed to say "early" 1999. The city will receive copies of the 334 package when it is available.</p>
<p>3. Page 3-14 says that the stormwater permit on site has been cancelled. What impact is that and is the property is violation at this time without one?</p>	<p>RESPONSE 3: The Navy believes that there is no impact because there is no industrial activity on former NTC. The RWQCB, however, issued the Navy of Violation and the BCP text (subsection 3.2.8, under "Stormwater") has been amended to reflect the RWQCB's viewpoint (see Corey Walsh's written Comment 2, above). This issue will be a topic of discussion at future city/Navy environmental status meetings.</p>

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<p>Originator: Cheryl Lester City of San Diego</p>	<p>Date received: 11 February 1999 (verbal comments received at BRAC Cleanup Team meeting and in writing)</p>
<p><u>COMMENTS</u></p> <p>4. Page 3-5 regarding POI 1 (aviation fuel line on Rosecrans). Is this being transferred as an easement area? - Has the line been retested or had any further repairs since all of those spills farther down the line a few tears back? - I presume the line will stay functioning after transfer...so who is the responsible party contact for follow up questions on the line?</p>	<p><u>RESPONSES</u></p> <p>RESPONSE 4: The Aviation Fuel Line is an 8-inch-diameter pipeline used by the Navy for transferring JP-5 jet fuel from FISC [Fleet Industrial Supply Center] to Marine Corps Air Station Miramar (formerly Naval Air Station Miramar). It is located on NTC property parallel to Rosecrans Street. FISC does not have an easement. A survey has been done and an easement will be recorded prior to property transfer. A 1994 pipeline exam revealed no leaks; later, two leaks were detected closer to the Point Loma (FISC) end of the line. The line was shut down for 18 months starting in 1996 and extensive repairs were made (only two repairs were on NTC land). Welds were x-rayed and even previous repairs made in the 1960s were redone. The pipeline was tested to 900 psi. It has been back in service since 1997. The fuel line is scheduled for another test and analysis this year. The Fuels Officer at FISC is the party to contact for follow-up questions. He may be contacted at (619) 553-1312.</p>
<p>5. In the No Further Action letters in Appendix C, several letters state that the regulator (County HMMD? RWQCB? both?) will need to be notified of change in ownership and/or land use. Will the property conveyance document be that notification of change in ownership or do individual letters need to be created for each site? - What definition of "change in land use" should be used in this case? (Zoning? change from office to sports area?, office to college?, etc.)</p>	<p>RESPONSE 5: The RWQCB is the lead oversight agency for former NTC. At the time of some of the tank closures, the County of San Diego had a contract with the RWQCB for oversight of tank cleanups and closures. RWQCB is the agency to be notified for change in ownership. The Finding Suitability to Transfer (FOST) document will serve as notification of change in ownership and the RWQCB will review the FOST.</p> <p>Change is <i>land use</i> is a post-conveyance issue and will be addressed at future city/Navy environmental status meetings.</p>

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Originator: Stephen Marsh Restoration Advisory Board (RAB) member	Date received: 4 February 1999
<u>COMMENTS</u> 1. Mr. Marsh's comments were provided verbally and responded to verbally at the 4 February RAB Subcommittee meeting.	<u>RESPONSES</u> RESPONSE 1: All comments were acknowledged and incorporated into the Final BCP Update 5 as agreed upon at the 4 February meeting.

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<p>Originator: Charles Bishop Restoration Advisory Board (RAB) member</p>	<p>Date received: 22 February 1999 (written comments)</p>
<p><u>COMMENTS</u></p> <p>1. Table 2-2 states that the Aircraft Noise Monitoring Agreement expired 6-30-98. Does this mean that such monitoring is no longer done on "former NTC" property?</p>	<p><u>RESPONSES</u></p> <p>RESPONSE 1: The agreement was renewed to run from 1 July 98 to 30 June 99 with an automatic 1-year extension, not to exceed 30 June 00 or property transfer, whichever comes first. Table 2-2 of the BCP has been changed accordingly.</p>
<p>2. Page 4-6, POI 4; Page 4-7, 4.2.5. What are the options to be discussed concerning the FAD ACM in buildings not scheduled for demolition?</p>	<p>RESPONSE 2: The options include negotiating the estimated costs for abating the FAD asbestos and then subtracting that from the appraised value of former NTC during the Economic Development Conveyance negotiations, or determining any credit the LRA (Local Redevelopment Authority) may receive for asbestos abatement that the LRA may be required to complete prior to reusing the building. Since the asbestos abatement program has been completed and the base is no longer operational, the costs associated with any future asbestos abatement may well become a part of negotiations involving the value of the former NTC property.</p>
<p>3. Page 4-8, 4.2.11. Have there been any tests of lead in soil adjacent to NTC buildings caused by degraded lead-based paint?</p>	<p>RESPONSE 3: There have been no tests in soil adjacent to NTC buildings for lead-based paint. This is not a DoD requirement prior to conveying property and, in accordance with DoD policy, lead in soil adjacent to buildings caused by degraded lead-based paint is not necessarily a release that requires a response. The Navy feels it has met the "full disclosure" requirements by determining which structures on base are most likely to contain lead-based paint and declaring that information in the BRAC Cleanup Plan.</p>

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<p>Originator: Charles Bishop Restoration Advisory Board (RAB) member</p>	<p>Date received: 22 February 1999 (written comments)</p>
<p><u>COMMENTS</u></p> <p>4. Page 4-10, 4.4. Has any consideration been given to my previous suggestion to give special briefings to Pt. Loma civic groups, such as the Peninsula Community Planning Board and the Point Loma Association? An annual briefing would be helpful to them and be a good "community involvement" move by the BCT Project Team.</p>	<p><u>RESPONSES</u></p> <p>RESPONSE 4: A great suggestion. Actually, the Base Closure Manager, Ms. Linda Geldner, and the former Base Transition Coordinator, LCDR Robert Baker, have given presentations to a number of civic groups in the area. If you have a specific group in mind, then a RAB member should coordinate with the BRAC Environmental Coordinator or Base Closure Manager in addressing the group. Also, RAB members should take the information distributed at RAB meetings and subcommittee meetings and convey the information to the community as he or she feels is appropriate.</p>
<p>5. Figure 5-1. Does the Site 12 schedule represent the worst case estimate? Seems rather long.</p>	<p>RESPONSE 5: Remember that the Site 12 schedule as represented in Figure 5-1 is the best estimate based on needing to complete the entire CERCLA process. In that sense, it does represent the "worst case" by requiring further action and triggering the requirement for further documentation and public involvement. It is only after we view the Remedial Investigation (due out in the summer of 1999) that we will have a clear idea of what we might need to do. The Site 12 schedule will then be changed to reflect the current situations.</p>
<p>6. Page 6-1, 6.1.2. Could you show the RAB an example of the use of the DQO [process and QA/QC protocols to help further our understanding?</p>	<p>RESPONSE 6: Excellent suggestion. The Data Quality Objective (DQO) process and Quality Assurance/Quality Control protocols will be a topic of discussion at the next RAB meeting.</p>
<p>7. Page 6-3, 6.3.1. Is the report on basewide groundwater available for review?</p>	<p>RESPONSE 7: The Draft Technical Memorandum, Basewide Groundwater Evaluation for NTC, is expected to be out for review in March 1999 and the BCP has been changed to say "early" 1999.</p>

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<p><u>COMMENTS</u></p> <p>8. Page 6-4, 6.5.1. What is the function of the "Natural Resources Trustees"? Is unanimous agreement required?</p>	<p><u>RESPONSES</u></p> <p>RESPONSE 8: The Natural Resources Trustees advise and provide technical expertise on ecological/natural resource issues to the Navy and regulators. They review documents such as work plans, reports, and analyses. No unanimous agreement is required.</p>
<p>9. Page 6-5, 6.5.3. Does the City's Reuse Plan contain unidentified land-reuse options? If not, why use residential reuse as targets?</p>	<p>RESPONSE 9: The City's Reuse Plan was not adopted by the San Diego City Council until 20 October 1998. Therefore, the Navy took a conservative approach in doing its environmental investigations over the years and conducted residential-level risk screening on appropriate sites and Points of Interest. This is commonly done because, if a site meets the residential-level criteria, no further risk assessment needs to be done and, ultimately, property can be transferred without land-use restrictions.</p>
<p>10. Page 6-8, 6.19. See Table 1-1. I couldn't find the Base Transition Coordinator.</p>	<p>RESPONSE 10: Since LCDR Robert Baker left, the former NTC Base Transition Coordinator is Mr. Keith Forman, who also is the BRAC Environmental Coordinator.</p>
<p>11. Table B-1, Report #93. Please tell the RAB the cost estimate for dredging the Boat Channel.</p>	<p>RESPONSE 11: The Navy is required to maintain a budget plan for all projects. A budget plan was submitted for the NTC Boat Channel that included a rough order-of-magnitude estimate for dredging the Boat Channel. This was intended only as an internal budget planning effort. Budget plans are updated annually as more accurate information becomes available. After the Remedial Investigation is complete, a Feasibility Study will evaluate remedial alternatives applicable to the Boat Channel and will document the engineering costs associated with each alternative. The draft Feasibility Study will be available for public review in the spring or summer of 2000.</p>