



California Regional Water Quality Control Board

San Diego Region



Peter M. Rooney
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov/~rwqcb9>
9771 Clairemont Mesa Boulevard, Suite A, San Diego, California 92124-1324
Phone (619) 467-2952 FAX (619) 571-6972

Pete Wilson
Governor

N00247.000588
NTC SAN DIEGO
SSIC #5090.3

Frist

Alpem@swrcb.ca.gov

October 2, 1998

Mr. Keith Forman
BRAC Environmental Coordinator
BRAC Program Office, Code 56NT
1420 Kettner Boulevard, Suite 507
San Diego, CA 92101-2404

Dear Mr. Forman:

**RE: 1998 SEMIANNUAL GROUNDWATER MONITORING REPORT 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 groundwater monitoring report, dated July 15, 1998. The monitoring report was prepared by SOTA Environmental Technology, Inc. on behalf of Southwest Division Naval Facilities Engineering Command (SWDIV) in accordance with contract No. N68711-96-D-2111, D.O. #0005. The document describes groundwater monitoring results collected on April 6, 7 and 8, 1998.

Our comments on the ground water monitoring report are as follows:

Required Information

1. Section *D.1.a* of Monitoring and Reporting Program No. 97-11 requires a discussion of any violations since the previous report, e.g. Notice of Compliance and inspection violations noted by either Regional Board or Navy staff including information regarding correction of the violations. The cover letter must also include a statement certifying that, under penalty of perjury, that to the best of the signer's knowledge the report is true, complete and correct.
2. Monitoring Provision *A.7* requires that ground water analytical results include the date and time that analyses were started and completed, and the name of the person performing each analysis. Monitoring reports should also provide a discussion of analytical results, recommendations and conclusions.

General Comments

1. In future groundwater monitoring reports please tabulate all historical groundwater analytical results, and include depth to groundwater, date of collection, and groundwater elevation for each sample event.

October 2, 1998

TALKED 2.
TO GREG
GREG WILL
CALL AL
AND GET
REPORT OR
INSPECTION
REPORT FROM
COUNTY.

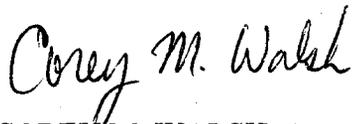
The monitoring report indicates monitoring wells ES-11S and ES-11D were damaged during construction activities. Please provide documentation that the required repairs to the monitoring wells have been completed, and submit to the RWQCB prior to October 31, 1998.

We have also received your letter dated September 21, 1998 in which you notified us that the next monitoring report will be delayed until December 15, 1998 due to a contract that the Navy has with its consultant. We understand that the Navy will try to meet the reporting schedule in 1999. Based on this letter, we will expect to receive the first monitoring report by April 30, 1999. If this is not correct please provide the date we can expect the Navy to submit the monitoring reports in accordance with the due dates contained in Monitoring and Reporting Program No. 97-11.

Your letter cites that another reason for the delay in maintenance and monitoring activities is due to the nesting season of the California Least Tern (April 1 to September 15). We do not concur that the nesting season is an obstacle which would delay submittal of future monitoring reports. The sampling required for the April 30, 1999 should be sampled no later than March and the sampling for the October 30, 1999 should be sampled immediately after the nesting season terminates. In addition, the maintenance activities, which are required to be completed by October 31 annually, could be completed during your regularly scheduled pre-season nesting area maintenance or directly after the conclusion of the season.

Please contact Corey Walsh at (619) 467-2980 or Carol Tamaki (619) 467-2982 if you have any questions regarding this letter.

Sincerely,



COREY M. WALSH, Associate Engineering Geologist
Site Mitigation and Cleanup Unit

dod-nt\site1\gwm4-98.doc

cc: Ms. Content Arnold, Remedial Project Manager, BRAC Operations Office, 1420 Kettner Blvd. Suite 507, San Diego, CA 92101-2404

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