

RESPONSES TO COMMENTS
DRAFT REMOVAL SITE EVALUATION WORK PLAN
INSTALLATION RESTORATION SITE 15
FORMER DRY CLEANING TRAINING FACILITY, FORMER NAVAL TRAINING CENTER
SAN DIEGO, CALIFORNIA
DCN: FWSD-RAC-00-0960
SWDIV Contract: N68711-98-D-5713, CTO 0013

Comment: by C. Cheng, RWQCB	Response:
<p>1. Please clarify how the Hazardous Materials Survey was conducted. In addition to visual observations of asbestos and transformers (for PCBs), there are other potential hazardous materials such as lead paint and pesticides that need to be properly sampled and tested. Results of waste characterization will determine the proper measures for waste transport and disposal.</p>	<p>The Hazardous Materials Survey was conducted by Coast Environmental Training Services under the direction of a Certified Asbestos Consultant. The survey consisted of a site inspection, collection of samples, and laboratory analysis for lead and asbestos. Based on the analysis, asbestos and lead based paint were detected and need to be properly abated and disposed of prior to demolition of the building. As for pesticides or any other hazardous materials on site, there were no containers or drums to be sampled and analyzed.</p>
<p>2. Based on the "Expanded Site Inspection Report" (SOTA, October 6, 1999), PCE concentrations up to 3,100 ppb exist in soil vapor at shallow depths (1-5' bgs) underneath the concrete slab. The concrete slab acts as an engineering barrier for VOC migration; therefore, by removing the slab it will inevitably release VOCs into the ambient air. The Navy should contact the APCD for applicable emission regulations, and is responsible for the health and safety of on-site workers and the community.</p>	<p>No APCD permit or notification is required for the type of work being performed. In accordance with the Work Plan, an area (i.e., approximately 10 feet by 10 feet) of the flooring around the drain opening that was identified as the potential source of the contamination will not be demolished with the majority of the floor slab. Demolition of slab-on-grade will be performed in a manner that will allow any potential near surface vapor to slowly defuse or vent as the work progress. In addition, the Site-Specific Health and Safety Plan for the project specifies the use of a PID determine the presence and monitor potential VOC concentrations.</p> <p>The Cal-OSHA PEL for PCE is 25 ppm. Since the maximum soil vapor concentration is 8 times less than the PEL, worker exposure by inhalation is not a concern. The Site Health and Safety Plan also requires the monitoring of the perimeter of the site for organic vapors. An action level of 1 ppm at the perimeter was set as a conservative measure to protect the community.</p>

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<p>3. It is anticipated that due to the sandy nature of the subsurface soil at the site, VOCs could preferentially partition into vapor phase. Therefore, staff suggests the following:</p> <p>a) Analyze soil samples as quickly as possible, preferably by an on-site mobile lab. If an on-site mobile lab is not available, solid samples should be either preserved with bisulfate solution, or extracted by methanol, or collected using a gas-tight vial in the field as specified by USEPA Method 5035, and be analyzed in a timely manner.</p> <p>b) In addition to the proposed 5.7 ppm PCE soil cleanup level using USEPA's residential PRG value, a human health risk assessment (HHRA) should be performed based on soil vapor concentrations. Results of HHRA may become an important factor in determining site cleanup levels.</p>	<p>Concur. As specified in the Field Sampling Plan, US EPA Method 5035/8260B will be used to analyze soil samples for VOCs.</p> <p>The proposed US EPA's residential PRG for PCE, 5.7 mg/kg, is currently the only "soil" cleanup criteria available and is endorsed by the Navy for this project. An exposure / risk assessment will be performed and documented in the final report.</p>
<p>4. Soils containing elevated VOCs should not be stockpiled. Rather, they should be placed in sealed containers, such as drums or gas-tight roll-off bins, and be disposed of in a timely manner.</p>	<p>Excavation and stockpiling of impacted soil is not anticipated for the RSE phase of the project. Cutting from the exploration borings will be placed in 55-gal drums and sealed lids.</p>

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5. Based on the boring log of SB-04 (SOTA, October 6, 1999), groundwater was encountered at 42 feet bgs at the site, which is in range with the proposed soil boring depth of 40 feet bgs. Staff recommends that groundwater samples be collected during soil boring at the floor draining area (SB-1 and SB-2) and down gradient from it (SB-6, SB-8 and SB-9). This is necessary in view that groundwater flow direction (Fig. 6-4, SOTA, 1999) and PCE concentration contours (Fig. 6-5) indicate that the two existing "down gradient" wells (MW-1 and MW-3) may have missed the suspected groundwater plume.	Concur. Three hydropunch groundwater samples will be collected from soil borings SB-1, SB-6 and SB-8 and analyzed for VOCs, US EPA Method 8260B. Section 5.2.5, RSE Sampling, of the RSE Work Plan, and the Field Sampling Plan will be revised to address the hydropunch groundwater sampling.
6. Please include copies of waste disposal manifest in the final report.	Concur. The disposal waste manifests will be provided in the final report.

FOSTER WHEELER

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TRANSMITTAL/DELIVERABLE RECEIPT

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 Naval Facilities Engineering Command
 Southwest Division
 Mr. Richard Lovering, 02R.RL
 1220 Pacific Highway
 San Diego, CA 92132-5190

DATE: 06/26/00

CTO: 0013

LOCATION: NTC SD

FROM: Kim Faxon D.P.M for:
 Neil Hart, Program Manager

DESCRIPTION: Response to Comments, Removal Site Evaluation Work Plan, IR Site 15,
Former Dry Cleaning Training Facility, 06/26/00

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