

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

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San Diego, California 92124-1331
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April 15, 1991

Commanding Officer
Attn: Ms. Martha Gandy
Department of the Navy
Naval Training Center
San Diego, California 92133-1000

Dear Ms. Gandy:

RE: DRAFT SITE INSPECTION (SI) WORK PLAN FOR NAVY EXCHANGE GAS
STATION, NAVAL TRAINING CENTER (NTC) (REF. NO. 5090 17/0311)

By letter dated March 26, 1991, your office requested Regional Board staff to review and comment on the above referenced work plan. This report was prepared by Jacobs Engineering Group Inc. under the Comprehensive Long Term Environmental Action Navy (CLEAN) program for NTC. The purpose of the SI is to conduct field sampling and analysis to determine if the on-site contamination is migrating off-site and if upgradient sources are potentially contributing to the on-site contamination.

Regional Board staff has reviewed the SI Work Plan and finds that the proposed plan provides an adequate approach to investigate the petroleum hydrocarbon release. However, staff has the following comments and concerns regarding the proposal which must be addressed in the final work plan:

GENERAL COMMENTS

1. The signature page must show appropriate registration/certification number(s) and affiliation of the signatories.
2. All boring logs must bear the stamp or signature of a California registered geologist or certified engineering geologist.

SPECIFIC COMMENTS

1. Page 3-9, 3.6 Seismic Activity

It is stated that both the Rose Canyon and Old Town Faults are northwest-trending "within the San Andreas System". This statement has been misused and is incorrect. Kennedy et al., 1975, actually stated that "Major faults in the San Diego area lie subparallel to the tectonic grain dominated by faults of the San Andreas system".

PAGE 2

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EXTENSIVE RESEARCH WAS PERFORMED BY NAVFAC
SOUTHWEST RECORDS OFFICE TO LOCATE THE MISSING
PAGE. THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED SHOULD THE
MISSING ITEM BE LOCATED.

FOR ADDITIONAL INFORMATION, CONTACT:

DIANE C. SILVA, RECORDS MANAGER
NAVAL FACILITIES ENGINEERING COMMAND, SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132

TELEPHONE: (619) 532-3676
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9. Page 5-11, Sampling Procedures, second paragraph.

How will sample holding times affect the modification to the ground-water monitoring program?

10. Page 6-1, Proposed Analytical Program

Why are ethylene dibromide analyses only proposed for ground-water samples? In order to help establish from where the contamination came, ethylene dibromide analyses should also be run on soil samples.

APPENDIX A

1. Page A-16, 4.3 Well Installation and Groundwater Sampling, second paragraph.

Describe the rationale for this well design. Filter pack design shall be based on sieve analyses of the aquifer formation and the screened casing should then be sized appropriately. A minimum three-foot granular bentonite seal should be placed in the annulus immediately above the filter pack. Wells should be designed to meet EPA's turbidity criteria of approximately 5 NTU's.

2. Page A-16, 4.3 Well Installation and Groundwater Sampling, third paragraph.

To establish well stabilization the pH, conductivity, and temperature criteria should be listed.

3. Page A-17, Figure A.4

This design shows the filter pack extending as much as 4 feet above the screened interval. Four feet of filter pack above the screened interval is excessive. In this environment a maximum of two feet of filter pack above the screened interval should be more than adequate unless there is significant caving within the well.

4. Page A-21, Table A.1

Organolead (using DHS methodology) should be added to this list of sampling and preservation requirements.

5. Page A-49, 9.1 Field QA/QC

All duplicates, blanks, etc. must be submitted "blind" to the laboratory in order to verify QA/QC procedures.

Ms. Martha Gandy
NTC Exchange Gas Station

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April 15, 1991

APPENDIX C

1. Page C-15, 4.1.1 Preassignment Training

It should be added for clarification that "An employer may also grandfather experienced personnel in accordance with OSHA 29 CFR 1910.120 paragraph (e)(9)."

Staff would be happy to meet with you to discuss these comments. If you have any questions, please contact John Anderson at (619) 265-5114.

Very truly yours,

Robert Morris

for ARTHUR L. COE
Executive Officer

ALC:RWM:jpa:ntc_gas.ltr

cc: Mr. Jeff Kidwell, Code 1812.JK, SW Division NAVFACENGCOM, ✓
1220 Pacific Highway, San Diego, California 92132-5190

Mr. Albert Arellano, Department of Health Services, Toxic Substances Control Program, Region 4 (Long Beach), Site Mitigation Unit, 245 West Broadway, Suite 350, Long Beach, California 90802

Mr. John Menatti, County of San Diego, Department of Health Services, Hazardous Materials Management Division, P.O. Box 85261, San Diego, California 92138-5261

File: 166-92; NTC, San Diego