

*These comments represent the  
USEPA comments on Site IR-14*

**COMMENTS ON THE DRAFT EE/CA  
NON-TIME CRITICAL REMOVAL ACTION FOR  
SITE IR-14  
FORMER SMALL ARMS RANGE  
FORMER NAVAL TRAINING CENTER SAN DIEGO**

*Martin Zhuslabin  
USEPA  
RPM  
18 Nov '98*

N00247.000709  
NTC SAN DIEGO  
SSIC NO. 5090.3

**GENERAL COMMENTS**

Review of this document has indicated that the appropriate remedy was selected for this small site.

**SPECIFIC COMMENTS**

1. **Section 2.3, p. 2-18, paragraph 4 and Figure 2-8.** Please state the basis for delineation of the lead impacted soil as shown in Figure 2-8, i.e., specify the concentration that was used and how this concentration was determined applicable. Although lead was detected in the area beyond the estimated extent of lead contamination, it appears that some areas below the project specific threshold (i.e., 7, 11, 42) were included within the boundary. Please explain.
2. **Section 4, p. 4-1, paragraph 6, last sentence.** This is not correct. In-situ stabilization for lead has been used to reduce leaching at other superfund sites with success. Please delete this sentence.
3. **Section 4.1.1.2, p. 4-5, paragraph 3.** The number of confirmation samples needs to be increased. Although five samples may be the minimum number statistically required to provide assurance that a mean is representative of the cleanup level, five samples are not enough to characterize the site. The site is approximately 55,000 square feet in size and the 10 samples used for costing would be more appropriate. Please specify that a minimum of 10 confirmation samples will be taken.
4. **Table 4-1, p. 4-10.** Please include 1 year for monitoring and maintenance on the site to assure or correct problems with revegetation or erosion of the backfill.
5. **Table 4-2, p. 4-19.** Please include costs for excavation and handling prior to treatment, it is not clear if these costs have been included.
6. **Table 4-3, p. 4-24.** It is not clear why maintenance is only included for 5 years. Because the toxicity and volume of lead will not be reduced under this alternative, the site will remain contaminated. As long as the potential for intrusive activities exists, long-term maintenance will be required. A 30-year period for maintenance would be more appropriate. Please revise.