

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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July 11, 1995

Mr. Hubert H. S. Chan
Remedial Project Manager
Western Division
Naval Facilities Engineering Command
Base Realignment and Closure Environmental Program, Code T4A
900 Commodore Drive
San Bruno, California 94066-2402

FACILITY STATUS REVIEW, NAVAL AUXILIARY LANDING FIELD, CROWS
LANDING

Dear Mr. Chan:

This transmittal constitutes comments from the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board, Central Valley Region (RWQCB). DTSC concerns have been adequately addressed in previous correspondence. Please find enclosed a memorandum from the RWQCB.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong
Project Manager
Office of Military Facilities

Enclosure

cc: Mr. Philip S. Isorena
Regional Water Quality Control Board
Central Valley Region
3443 Routier Road
Sacramento, California 95827-3098



Mr. Hubert H. S. Chan
July 11, 1995
Page Two

cc: Mr. Neil J. Bingert
PRC Installation Coordinator
PRC Environmental Management, Incorporated
1099 18th Street, Suite 1960
Denver, Colorado 80202

Mr. Robert Fourt
Stanislaus County Department of Environmental Resources
1716 Morgan Road
Modesto, California 95351

Ms. Sandra Olliges
Environmental Program Manager
National Aeronautics and
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MEMORANDUM

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD • CENTRAL VALLEY REGION

3443 Routier Road, Suite A
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Phone: (916) 255-3000
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TO: Wendy L. Cohen ^{WLC}
Senior Engineer

FROM: Philip S. Isorena
Associate Engineer

DATE: 21 June 1995

SIGNATURE: Wendy L. Cohen for

SUBJECT: ***FACILITY STATUS REVIEW, NAVAL AUXILIARY LANDING FIELD, CROWS LANDING, STANISLAUS COUNTY***

I have reviewed the following documents to establish the status of the above facility:

1. Draft First Quarterly Ground Water Monitoring Report, 8 September 1994
2. Draft Remedial Investigation Work Plan, 18 November 1994
3. Draft Second Quarterly Ground Water Monitoring Report, 8 December 1994
4. Draft Final First Quarterly Ground Water Monitoring Report, 6 January 1995
5. Responses to Comments on the Draft Final Site Investigation Addendum and First Quarterly Monitoring Report, Naval Auxiliary Landing Field Crows Landing, 6 January 1995
6. Draft Third Quarterly Ground Water Monitoring Report, 3 March 1995
7. Response to Comments on the Draft Installation Restoration Program Remedial Investigation Work Plan, Naval Auxiliary Landing Field Crows Landing, 7 March 1995

The documents report the site background, hydrogeology, and the findings of soil and ground water investigations and samplings. I have reviewed all of the above documents for background information. My comments focus on Items 5 and 7 because they are related to the work plan for the installation restoration program (IRP) sites.

- I. Responses to Comments on the Draft Final Site Investigation Addendum and Draft First Quarterly Monitoring Report, Naval Auxiliary Landing Field Crows Landing, 6 January 1995

PRC's response addresses comments presented by the Department of Toxic Substances Control (DTSC), Board, National Aeronautics and Space Administration (NASA), and Stanislaus County Environmental Health Department (EHD). My comments on PRC's responses to Board staff comments are presented below.

A. Responses to Board Comments on the Draft First Quarterly Monitoring Report

1. Page 3, Item 1

This item pertains to establishing a long-term ground water monitoring plan. When Board staff commented in November 1994, staff wanted the Navy to establish a long-term monitoring plan in accordance with the California Base Closure Environmental Committee's (CBEC) *Long-Term Ground Water Monitoring Program Guidance*. PRC

stated that the Navy prefers to use the data generated during the first four quarters to establish the long-term monitoring plan consistent with the CBEC guidance document. To date, four quarterly samplings have been completed and the fourth quarter monitoring report has been submitted. Therefore, the Navy can now proceed with establishing a long-term ground water monitoring plan.

2. Page 3, Item 2

Staff's comment requested that a historical summary of each well which had gone dry be included in the quarterly monitoring report. PRC stated that this information will be included in the annual report. This is a reasonable request since there may have been only one or two quarterly samples taken from these wells before they went dry. Furthermore, since four quarterly samplings have been completed, the Navy should now prepare the annual report including this information. It would not take much effort to include this information in subsequent quarterly monitoring reports. The data from these wells would give the report reviewer an historical perspective not only in terms of ground water chemistry but also of ground water hydrogeology.

3. Pages 4 and 5, Items 3 through 7

PRC's responses address staff's comments.

B. Responses to Comments on the Draft Final Site Investigation Addendum

1. Page 5, Item 1

Staff concurred with PRC regarding the need to establish a larger database for pesticide "background" conditions. However, in its latest response, PRC requested further discussion on the need to develop a database for "background" pesticide conditions. A meeting should be scheduled to discuss this and other outstanding issues.

2. Page 6, Items 2 and 4

PRC's responses address staff comments.

3. Page 6, Item 3

PRC stated that the lack of potential health risks associated with metal concentrations at Site 18 suggests that continued investigation is not warranted, discussion with regulatory agencies regarding this issue should continue, other options such as additional evaluation of health risks should be discussed prior to collecting additional background or site data, and a common understanding of the proper use and evaluation of background data needs to be established prior to collecting additional background data.

The metal concentrations at Site 18 may not pose health risks but may still degrade water quality. Therefore, a water quality assessment (WQA) must be done at the site to determine if the metal concentrations pose a threat to water quality. I concur with PRC that further discussion is necessary regarding the need for additional investigation at Site 18, background sampling issues, and other unresolved items. A meeting should be scheduled as soon as possible to resolve these issues.

II. Responses to Comments on the Draft Installation Restoration Program Remedial Investigation Work Plan, Naval Auxiliary Landing Field Crows Landing, 7 March 1995

PRC's response addresses comments presented by the DTSC, Board, NASA and Stanislaus County EHD. My comments on PRC's responses to Board comments are presented below.

A. General Comments

1. Page 5, Item 1

PRC proposed to use 100 mg/kg as a soil screening level for recoverable total petroleum hydrocarbons (TPH-R) and extractable TPH (TPH-E), 5 mg/kg for toluene, and 74 mg/kg for xylenes, to evaluate site investigation (SI) data to determine if WQAs are needed at each IRP site. PRC stated that the 100 mg/kg soil screening level is consistent with the Board's guidance for evaluating TPH-contaminated sites usually requiring no further investigation. PRC proposed the levels for toluene and xylenes based on US EPA's December 1994 *Soil Screening Guidance* document.

Usually the 100 mg/kg TPH level is protective of ground water quality. However, to ascertain that this is true, the Navy must evaluate at each site if this concentration and the proposed residual concentrations for toluene and xylenes will pose a threat to water quality. One way to evaluate the potential for water quality impacts of these constituents is to use the Board's *Designated Level Methodology* (DLM). Since TPH, toluene, xylenes, and other organic compounds are not naturally occurring in the environment at Crows Landing, their presence in the soil suggests a potential water quality threat which must be assessed.

The attached 25 April 1995 memo from Jon Marshack comments on the USEPA's *Soil Screening Guidance* (SSG) document. Dr. Marshack states that the soil screening levels do not ensure beneficial use protection because they are based entirely on human health risk assessment methods and other limiting assumptions. Therefore, the Navy must conduct a WQA at each site to determine the constituent concentrations in soil which are protective of the beneficial uses of the ground water.

2. Page 6, Items 2 and 3

In Item 2, PRC stated that the remedial investigation (RI) work plan would be as comprehensive as possible to minimize the need for subsequent field work. However, in Item 3, PRC also stated that potential areas of contamination described in the 1994 Tetra Tech baseline environmental report would be addressed separately from this RI work plan. At a minimum, we should get a schedule for work implementation and funding assurances to ascertain that future investigations will be conducted timely at these potential sites.

3. Page 6, Item 4

PRC's response is adequate.

4. Page 6, Item 5

See comment on Item I.B.1.

5. Pages 7 and 8, Items 6, 7, and 8

PRC's responses are adequate.

B. Site Specific Comments

1. Site 11, Disposal Pits Area

Staff stated that additional soil samples must be taken to define the lateral and vertical extent of soil contamination; throughout the soil column, samples must be collected every five feet, at lithologic changes and discolorations, and just above the water table; and estimated boundaries must be illustrated on Figures 3-1 and 4-1 and described in Sec. 4.1.2.2.1.

PRC stated that aerial photos showed no evidence of disposal pits; the exact locations and sizes of disposal pits remain unknown; the draft RI work plan will include at least two soil borings in the areas of highest ground water contamination; soil samples will be collected every five feet to 40 feet below ground surface (bgs) and from zones of obvious contamination; samples from 0, 5, 10, 15, and 20 feet bgs and from obvious zones of contamination will be analyzed using the deionized waste extraction test (DI-WET); one sample from immediately above the water table will be tested for total constituents; and soil gas sampling is not proposed because no volatile compounds have been detected in previous ground water samples.

With the exception of performing the soil gas survey (SGS), PRC has responded to all of staff's concerns. Since existing Site 11 wells were sampled only once or twice before they went dry, the presence or absence of volatile organic compounds (VOCs) in ground water has not been confirmed. Future ground water samples could show VOCs. Furthermore, except for 11-SB-01, toluene was detected at all soil sampling locations. Thus, it may be better to do a SGS now to confirm the absence or presence of VOC-contaminated soil gas in the vadose zone.

2. Site 12, Auto Maintenance Shop Area

Staff stated that the soil gas study proposed for underground storage tank (UST) 117 should be expanded to Site 12; the Navy should investigate the nature and extent of ground water contamination at Site 12; soil samples are needed at the north end of the vehicle parts and washrack area; the Navy should conduct a WQA at three past disposal sites to determine the threat from pesticides and inorganics; the work plan should discuss past activities at the auto maintenance shop area, disposition of waste oil and/or solvents, presence or absence of an oil/water separator, and locations of sewer lines/drains; and the latter site features should be included on a map.

PRC stated that investigation activities for USTs 117 and Cluster 1 have been described in the 30 January 1995 field sampling plan which will include hydropunch (HP) ground water sampling at Site 12; the draft final RI work plan will include additional soil sampling to evaluate potential ground water contamination sources at Site 12, but evaluation of the nature and extent of ground water contamination in the area will continue to be pursued under the UST program; a soil vapor extraction (SVE) pilot study is planned for UST 117 to evaluate SVE as a soil remedial alternative; and there are no plans to extend the pilot study into Site 12.

PRC's responses address staff's comments except the soil gas issue. Although the purpose of the SVE pilot study is to evaluate the viability of this technology as a soil remedial alternative, the availability of the equipment facilitates the performance of a SGS at Site 12. As at Site 11, only one or two ground water samplings were conducted at this site before the well went dry. Therefore, the absence or presence of VOCs in ground water has not been confirmed. Since the equipment would be available onsite, soil gas samples could be taken at Site 12 to determine if the soil vapor is contaminated or not.

The work plan proposed to use slug tests to design the remediation alternative. Slug test data are applicable only within the immediate vicinity of the well while pumping test data include a wider area and, therefore, should be used to design a ground water pumping system.

3. Site 13, Transformer Oil Spill Area

Staff stated that since surface soils were excavated when the transformer pad was enlarged, the SI soil samples may not represent potentially-contaminated native soils, and additional soil samples must be collected to investigate the native soils beneath the pad, determine the nature and extent of pesticide contamination in accordance with the SI sampling protocol, and determine soluble concentrations which may pose a threat to water quality.

PRC stated that DTSC and the Board approved the slant drilling to sample the native soils next to the original concrete pad. No additional sampling activities are proposed to evaluate potential polychlorinated biphenyl (PCB) contamination at Site 13; one soil sample will be taken for toxaphene analysis but no sample will be taken to evaluate inorganic constituents.

PRC must demonstrate that native soils were indeed sampled during the SI. If not, additional samples must be taken for PCB testing. I concur with the toxaphene sampling. I am not sure if metals are associated with PCBs or toxaphene-containing pesticides.

4. Site 16, Pesticide Rinse Area

Staff stated that metals in soil and ground water were not investigated; additional soil samples are needed to define the extent of TPH contamination and determine the presence or absence of metals which may pose a water quality threat.

PRC stated that pesticides were not detected in soil or ground water; all TPH soil concentrations were below the soil screening levels proposed in the response to General Comment #1; the draft final RI work plan will include taking two soil samples in one boring near 16-SB-01; and monitoring well 16-MW-01 was located in the middle of the site and, therefore, was positioned to detect any possible contamination resulting from Site 16 activities.

See Item II.A.1 regarding soil screening levels. Although the use of soil screening levels may not be water quality protective, the concentrations (2 - 20 mg/kg) detected at this site were so low that based on my experience at similar sites, the depth to ground water and soil types at this site, and the type of petroleum hydrocarbon in question (oil), it is unlikely that the latter would cause a water quality impact. Therefore, PRC's responses are adequate.

5. Site 17, Demolished Hangars Area

Staff stated that the Navy should collect soil and soil gas samples every five feet and at locations of discoloration or lithologic changes through the length of each soil boring with the lowest sample from just above the water table; perform a WQA to determine potential impacts from inorganic constituents; show floor drain sumps, piping, and laundry facility on site maps; and include the SGS results in the RI work plan.

PRC stated that the RI work plan will be revised to include at least two soil borings in the areas of highest ground water contamination based on HP sampling; soil samples will be collected at every five feet to 40 feet bgs and from zones of obvious contamination and immediately above the water table; these samples will be tested for total concentrations; samples from 0, 5, 10, 15, 20 bgs, and zones of obvious contamination will be analyzed using DI-WET; a soil gas profile will be completed at the potential source area borings; the locations of the floor drain sump and laundry will be added to Figure 4-2 in the draft final RI work plan; and all soil gas sampling results were added to the 6 January 1995 draft final SI addendum report.

PRC has adequately responded to staff comments.

6. Site 18, Firing Range

Staff stated that the Navy should collect additional soil samples, for DI-WET analysis, within and directly beneath the highest potentially contaminated zones to determine if the metals previously detected above background pose a threat to water quality.

PRC stated that additional background surface soil samples will be collected as part of the RI activities; two soil samples will be collected at the surface and three feet bgs in location 18-HB-2 which had the highest total lead concentrations; and the samples will be analyzed for total and DI-WET metals.

PRC's responses are adequate.

III. 7 June 1995 Meeting Summary

A. Soil Screening Levels

As agreed at the meeting, PRC has calculated the designated levels for TPH-E and TPH-R, toluene, and xylenes using the Board's 17 May 1995 *Beneficial Use-Protective Water Quality Limits for Components of Petroleum-Based Fuels* and attenuation factors of 10 and 100. Table 1 below shows these designated levels, the USEPA's December 1994 *Soil Screening Guidance* document numbers, the Board's designated levels, and the practical quantitation limits. Table 1 shows that the levels are highly dependent on the attenuation and leachability factors used. To minimize the uncertainties in these factors, they should be derived. I recommend that the Navy use the mixing zone equations presented in the USEPA's SSG document to determine the attenuation factor at each site. To obtain the leachability factor of each constituent for each soil type such as sandy soil, silt, and clay, the leachable concentration is simply divided into the total concentration. Since the total concentrations for the constituents of concern are already available for each soil type, only the leachable concentrations of each constituent of concern need to be determined. These numbers will serve as the designated levels.

Constituents	PRC: LF ¹ =10		RB: LF=10		USEPA	PQL ³
	EAf ² =10	EAf=100	EAf=10	EAf=100	EAf=10	
TPH-E/-R	10	100	0.1	10	N/A	1
Toluene	4.2	42	0.42	42	5	0.005
Xylenes	1.7	17	0.17	17	74	0.005

¹ Leachability Factor

² Environmental Attenuation Factor

³ Practical Quantitation Limit

During a follow up conversation on 15 June 1995, Mr. Neil Bingert of PRC stated that the levels really would not make much difference because the concentrations of samples in areas which could be considered for no additional investigation are lower than either the designated levels he derived or the USEPA's soil screening levels; he will not propose screening levels in the draft final work plan; PRC proposes to run totals in soil samples taken every five feet and at the capillary fringe; the capillary fringe sample will also be tested by the DI-WET; additional WET samples will be taken, if necessary, in the next phase of work; and the revised work plan will be submitted by 26 June 1995.

I reiterated my comments regarding minimizing the uncertainties in the attenuation and leachability factors. I also said that when more definitive designated levels have been determined using the mixing zone equations, the leachability factors from the WET and total concentrations of each constituent of concern, they can be used to screen areas where no further investigation would be needed. I concurred with the proposed soil sampling program.

B. Additional Sites

Board staff stated that the Navy needs to review the 1994 baseline environmental report (BER) to determine which are sites and which are not. Messrs. Chan and Chuck will review the BER and ask PRC to document identified sites.

C. DI-WET

Board staff asked for the DI-WET in soil samples with the highest total concentration and in samples taken at the water table. PRC had proposed running DI-WET on samples every five feet and getting a quick turnaround to avoid archiving samples. PRC will make a cost comparison and determine which approach is more cost-effective. PRC will run TCLP for volatiles such as TPH-P (purgeables) and BTEX, and WET for TPH-E, TPH-R, PCBs, and pesticides.

D. Site 11, Disposal Pits Area, Soil Gas Sampling

Although previous soil samples showed hits of acetone and toluene, PRC did not propose soil gas sampling because no VOCs have been detected in previous ground water samples. PRC also said that TPH as motor oil, but not VOCs, is showing up in HP samples. Staff stated that the SGS may be needed if subsequent ground water samples show VOCs. The SGS will be needed to identify source areas.

E. Site 12, Auto Maintenance Shop Area

PRC stated that since an aquifer pumping test will be done at UST 117 which is adjacent to Site 12, a pumping test is not needed at Site 12; the equipment used in a SVE pilot study is different from the SGS equipment; the soil contamination at Site 12 has been defined; the source of ground water contamination at Site 12 is likely at UST 117 or Cluster 1; and PRC will take additional samples at Site 12 as proposed in the work plan. Board staff concurred that a pumping test is not needed at Site 12 and that a SGS is not needed at this time but may be needed in the future.

F. Site 13, Transformer Oil Spill Area

PRC will prepare a diagram showing where the soil samples were taken to demonstrate that the samples taken were indeed native soils. PRC also will take another soil sample for toxaphene and PCB testing.

G. Site 16, Pesticide Rinse Area

PRC will run totals in samples at zero and three feet bgs. If results are above background, PRC will run DI-WET.

In a related matter, PRC stated that surface background samples were planned to show that toxaphene at Site 13 and lead at Site 18 were background. Board staff stated that the Navy must show whether these constituents pose a threat to water quality. PRC said they will run WETs at these sites and do background later, if necessary.

MEMORANDUM

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD • CENTRAL VALLEY REGION

3443 Routier Road, Suite A
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Phone: (916) 255-3000
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TO: Phil Isorena & Wendy Cohen
SLIC & DoE Unit

FROM: Jon B. Marshack
Senior Environmental Specialist
Environmental/Technical Support Unit

DATE: 25 April 1995

SIGNATURE: 

SUBJECT: **REVIEW OF USEPA "SOIL SCREENING GUIDANCE"**

At your request, I have reviewed the subject draft document, dated December 1994. I understand that consultants for the Naval Auxiliary Landing Field (NALF), Crows Landing site have proposed to use Soil Screening Levels (SSLs) from this document to screen out areas where further assessment and remediation efforts will not be considered. This proposal is not consistent with Water Board requirements for water resource protection, because the SSLs are based entirely on human health risk assessment methods and other limiting assumptions. As such, these levels do not insure beneficial use protection as measured by compliance with applicable water quality objectives. The attached memorandum, *The Role of Risk Assessment and Chemical Transport Modeling in Site Assessment and Cleanup Level Determination*, explains why health risk based assessment and cleanup methods are not necessarily water resource protective. Specific issues regarding USEPA's SSLs are listed below.

- 1) SSLs consider only human health risks. More limiting human welfare considerations (e.g., taste & odor, secondary MCLs) and other beneficial use impacts are not considered.
- 2) SSLs are not protective of ecological receptors (e.g., beneficial uses of surface waters related to aquatic life and wildlife protection).
- 3) SSLs assume only those beneficial uses of water associated with residential land use. Criteria protective of other water uses, for example agricultural water use, can be more restrictive than human health-based criteria for some constituents (e.g., copper, selenium, TDS, zinc).
- 4) SSLs for the migration to ground water pathway use non-zero MCLGs as default water limits. MCLs are used where non-zero MCLGs are unavailable. Cancer risk levels and other health based criteria are used only if MCLs and non-zero MCLGs are unavailable. This hierarchy of numerical criteria is inconsistent with guidelines for selection of health based criteria by DTSC and OEHHA (see the attached memorandum, *Interagency Meeting on Cleanup Level Determination*). It also ignores other potentially more limiting criteria that are also relevant to water resource protection (e.g., Proposition 65 criteria, taste & odor thresholds, secondary MCLs).

- 5) Surface water impacts are not included in the derivation of SSLs.
- 6) SSLs are based on total soil concentrations in mg/kg. For the migration to ground water pathway, soil leachate concentrations are calculated using equilibria equations. Direct measurement of leachable/mobile concentrations (e.g., deionized water WET extractions for non-volatiles and semi-volatiles, soil vapor sampling for volatile constituents) more accurately measures concentrations that have the ability to migrate to ground water. Our experience at many other sites has shown that site screening of soils for volatile organic pollutants, such as TCE and PCE, using soil matrix samples can easily miss important source areas for ground water pollution because VOCs are easily lost from soil samples during sampling and analysis. Soil gas sampling for VOCs is a much more reliable screening tool.
- 7) Because the goal of SSLs is to assess chronic human exposures, the USEPA document averages surface soil concentrations over 0.5-acre areas and averages subsurface soil concentrations throughout each borehole. This procedure will mask hot spots that may pose significant threats to ground and/or surface water resources. The chronic exposure limitations are not necessarily relevant for compliance with beneficial use protective water quality objectives.
- 8) A point of compliance at the downgradient edge of the site is used for calculation of SSLs for the ground water pathway. Dilution within the saturated zone is assumed prior to reaching this compliance point. These concepts are inconsistent with the fact that water quality standards are applicable throughout a water resource in California so as to insure protection of existing and future beneficial uses.
- 9) Attenuation within the unsaturated zone is not considered in deriving generic SSLs. In areas where contaminants have not yet broken through to ground water and where a significant separation exists between soil contaminants and the water table, consideration of unsaturated zone attenuation can result in more realistic and less restrictive site screening and cleanup criteria.
- 10) The interactive effects of combinations of chemicals is not built into the SSLs. To be truly protective of beneficial uses of water resources, toxicologic interaction of chemical pollutants must be considered. Cleanup level setting criteria in §2550.4 of 23 CCR, require that additivity be assumed for all chemicals having similar toxicological effects or having carcinogenic effects. These criteria are required to be used to develop cleanup levels greater than background under the State Water Board's Resolution 92-49, *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code Section 13304*.
- 11) The generic SSLs assume a fixed degree of attenuation, which does not consider whether ground water has already been affected by the chemicals being studied. If a contaminant has already reached ground water and caused pollution, attenuative mechanisms cannot be relied upon to be protective of ground water quality.

At the top of page 6 of their *Soil Screening Guidance* document, USEPA states:

“Additional pathways, receptors, or chemicals must be evaluated on a site-specific basis.”

Consideration of (a) surface and ground water resources themselves as receptors, and (b) California’s beneficial use protective water quality standards as measurements of the “health” of those receptors, is what is missing in the pathways, receptors, and chemicals covered by USEPA’s SSLs. Site-specific evaluation of threats to water resources and their beneficial uses must be added to the site assessment method that has been proposed for NALF, Crows Landing.

M

Attachments (2)

cc: Ton Vorster, Federal Facilities Unit

ATTACHMENTS

MEMORANDUM: THE ROLE OF RISK ASSESSMENT AND
CHEMICAL TRANSPORT MODELING IN SITE ASSESSMENT
AND CLEANUP LEVEL DETERMINATION

MEMORANDUM: INTERAGENCY MEETING ON CLEANUP
LEVEL DETERMINATION

THESE ATTACHMENTS WERE NOT RECEIVED IN THE
RESTORATION RECORD FILE.

FOR ADDITIONAL INFORMATION, CONTACT:

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