



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

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NTC SAN DIEGO
SSIC #5090.3

1994 SEP 28 PM 2:13

September 20, 1994

Mr. Kurt Baer
SouthWest Naval Facilities Engineering Command
Environmental Division
1220 Pacific Highway
San Diego, CA 92132-5181

Dear Mr. Baer:

EPA has reviewed the "Draft Preliminary Assessment Report, NTC, Sites 4, 5 and 6", dated July 12, 1994. Please address the enclosed comments (Enclosure A). If you have any questions, I can be reached at (415) 744-2389.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bonnie Arthur".

Bonnie Arthur
Remedial Project Manager
Federal Facilities Cleanup Branch

Enclosure

cc: Mr. Alvaro Gutierrez, DTSC
Mr. Corey Walsh, RWQCB
Mr. Phill Dyck, SDNTC Environmental Office

ENCLOSURE A

EPA COMMENTS ON SAN DIEGO NAVAL TRAINING CENTER (NTC) DRAFT PRELIMINARY ASSESSMENT (PA) REPORT, SITES 4, 5 AND 6

GENERAL

- 1) EPA concurs with the recommendation of further action for Sites 5 and 6 but does not concur with the recommendation of no further action for Site 4. See specific comments.
- 2) Please provide a brief description of how PA Sites 4-6 were identified, how the other identified PA sites will be incorporated into the cleanup process and the process to ensure that no other sites remain at NTC (for example, has Building 288 (mattress sterilization) been evaluated?).
- 3) Provide a brief overview of the process the Navy will follow after comments are submitted from regulatory agencies and the Restoration Advisory Board (RAB) (i.e. preparation of workplan).
- 4) For ease of review, it may be useful to put maps in future reports in a separate appendix.
- 5) References should be provided with each table, if appropriate.

SPECIFIC

- 1) Page 1-1; Clarify how a PA determines the need for remedial actions. PAs generally focus on removal actions or possible emergency response actions.
- 2) Page 1-4, Section 1.3.3; Provide a discussion of the years chosen for review of aerial photographs and their correlation to the historic industrial uses at NTC.
- 3) Page 1-4; Provide a summary of past local, state or Federal regulatory activities, including permits, violations, and inspections.
- 4) Page 2-3, Section 2.3; Provide a brief geology section for Sites 4-6. It is not appropriate to reference the Environmental Baseline Survey for geology descriptions.
- 5) Page 3-3; Provide a brief status of regulatory oversight at the former Chevron gas station. Are monitoring wells located nearby or proposed?
- 6) Page 4-8, Section 4.2.4; Provide any available information

regarding the underground storage tanks, i.e., size, removals, sampling to verify. Discuss process and timing for sediment sampling along discharge areas at NTC.

- 7) Pages 4-8, 4-9; Please provide a description of the storm water channel, i.e. condition, drainage history.
- 8) Page 4-8, Section 4.2.2; Include relevance of the reference to lead as a "trace" constituent of gasoline.
- 9) Page 4-9, Section 4.2.8; Discuss the standard Navy disposal practices for the "lighter petroleum hydrocarbons" separated from the seawater?
- 10) Page 4-10, Table 4-2; It may be useful to designate which chemicals are currently used at NTC. Additionally, it is appropriate to distinguish between probable and known carcinogens. The carcinogens can be classified utilizing the A, B, and C categories outlined in the US EPA "Weight of Evidence" (see US EPA Guidelines for Carcinogens' Risk Assessment, 9/24/86, Federal Register #51, Citation 33992).
- 11) Page 4-12, Table 4-2; Ortho has produced several different products called "Triox". It appears that the Triox used at NTC is the Triox liquid herbicide, containing pentachlorophenol. Please include chemical composition in text which corresponds to Table 4-2.
- 12) Page 5-1, 2nd paragraph; Provide the criteria for a "deep" aquifer."
- 13) Page 5-2, Section 5.1; Briefly discuss relevance of the hydraulic conductivity values.
- 14) Page 6-4, Section 6.6; Provide an estimate of the population (residents, students and workers) within 4 miles of NTC.
- 15) Page 7-1, Section 7.1.1; The 1988 PCB data should be provided, if available. It may be necessary to collect soil samples in this area to confirm the PCB cleanup if data is not available.
- 16) Page 7-2, Table 7-2; Given the absence of documentation of the document incinerator and PCB spill cleanup data, it is not appropriate to rate "No" for suspected releases at Site 4 (please see comment #15).
- 17) Page 7-3, Section 7.1.6; The text states that it is "unknown if USTs remain underground" at the Former Firefighter Training School. Are geophysical techniques planned to resolve the question of whether USTs remain?
- 18) Page 7-4, Section 7.1.12 and Page 7-6, Section 7.2.2;

Clarify the DDT volatility references. There is significant difference between a chemical remaining in the soil versus volatilizing into the air. Include in the discussion a comparison of other chemicals found at NTC (see Table 4-2).

- 19) Page 7-4, Section 7.1.9 and 7.1.10; Please include a discussion of other chemicals in addition to DDT.
- 20) Page 7-4, 7-5; Please expand the air pathway discussion to include the following: 1) chemicals currently used, 2) volatility (in addition to values given in Table 4-2) and potential to contribute to a current air exposure.
- 21) Page 7-8, Table 7-3; "N/A" for "Area" may not be the most accurate description for Site #5. Contaminated soil may not be present at Site 5, however, given that currently there are no available records, it is more appropriate to state "unknown".
- 22) Page 8-1; Please clarify that the PA does not take "into consideration adverse health affects," but evaluates potential exposure pathways.
- 23) Page 8-1; Provide greater detail regarding types of removal actions (i.e. time critical or non-time critical).
- 24) Page 8-1; Site 4, Former Document Incinerator. For the following reasons, EPA cannot concur with the "no further action" recommendation at this time: 1) the Navy should investigate standard Navy uses for "Document Incinerators" to supplement the rationale for no sampling, and 2) provide the confirmation PCB data (see Comment #16).
- 25) Page 8-1; Site 5, Former Firefighter Training School. EPA agrees with recommendation of further investigation. Please provide a schedule for workplan submittal and fieldwork.
- 26) Page 8-1; Site 6, Golf Maintenance Shop. EPA concurs with recommendation of further investigation. Please provide a schedule for workplan submittal and fieldwork. Clarify if sampling will be scheduled (as part of the transfer process) at areas of the golf course with the highest probability of pesticide/herbicide contamination.