

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4

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San Diego, CA 90802-4444
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1994 SEP 28 PM 2:14

September 26, 1994

Mr. Kurt Baer
Remedial Project Manager
SWDIV Naval Facilities Engineering Command
1220 Pacific Highway, RM. 18
San Diego, California 92132-5181

Dear Mr. Baer:

DRAFT PRELIMINARY ASSESSMENT REPORT NAVAL TRAINING CENTER SITES 4, 5, AND 6, SAN DIEGO, CALIFORNIA

The California Department of Toxic Substances Control (Department) has completed its review of the *Draft Preliminary Assessment Report Naval Training Center Sites 4, 5, and 6, San Diego, California (Draft Report)*, dated July 12, 1994, for San Diego Naval Training Center, San Diego. The *Draft Report* was prepared for SouthWest Division Naval Facilities Engineering Command by Bechtel National, Inc.

The Department reviewed the *Draft Report* and has found that Site 4 needs additional information in order to determine whether no further action is justified. If the additional information which has been requested in the comments can not be obtained regarding the soaking tanks and sumps, then the Department will recommend that confirmatory sampling should be conducted at Site 4. This confirmatory sampling will help to determine if any hazardous substances were released during the years of operation or left in place after operation of the incinerator ceased. The Department agrees with the recommendation of further action for Site 5 and 6. For Site 5, the Department suggest that the stormwater channel soil and outfall be sampled. In future investigation determine whether any Underground Storage Tanks (UST) remain on site. For Site 6, the Department recommends the future investigation should consider taking samples on the golf course to determine levels of herbicides or pesticides present in the soil and if any impact has occurred to the groundwater.

The Department has compiled general and specific comments on this document from its internal technical staff which are enclosed within this letter. If you have any questions regarding this letter, please contact me at (310) 590-5565.

Sincerely,

Alvaro Gutierrez
Base Closure Team Member
San Diego Naval Training Center
Region 4 Base Closure Unit

Enclosures



Mr. Kurt Baer
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cc: Mr. Albert Arellano Jr., P.E. R4-4
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GENERAL COMMENTS

1. This document was reviewed for scientific content. Minor grammatical or typographical errors that do not affect the interpretation have not been noted. However, these should be corrected in the final version of the document.
2. Future changes in the document should be clearly identified. This may be done in several ways; by submitting revised pages with the reason for the changes noted, by the use of strikeout and underline, by the use of shading and italics, or by cover letter stating how each of the comments herein has been addressed.
3. For Site 4, the department would like the Navy to look at other facilities for similar operations of document incinerators. Obtaining this information will aid in determining what hazardous substances were used during the years of operations of the incinerator.
4. For Site 5, since it is unknown whether Underground Storage Tanks (UST) remained underground or not at the site, the Department recommends that in the next phase of investigation that a geophysical investigation be conducted. Furthermore, stormwater channel should be sampled to determine whether hazardous substances are present from past discharges.

SPECIFIC COMMENTS

1. **Page 1-5, Table 1-1** Include in this table the length of time personnel worked at NTC, areas observed of daily on site practices and facility-specific information.
2. **Page 3-3, Paragraph 5** Please delete this paragraph because this section should only mention adjacent land usage not environmental problems nearby.
3. **Page 4-1, Paragraph 2, Line 6** States that "No information regarding hazardous substance use, storage or disposal was found for the former document incinerator site." If no additional information is available than sampling must be conducted on the areas of concern.
4. **Page 4-1, Paragraph 4, Line 7** States that "No existing data were found regarding the use of the soaking tanks". Provide more information by checking other military facilities records that have used document incinerators soaking tanks.
5. **Page 4-1, Paragraph 5** States that "No existing data were found regarding the use of the sumps." Provide more information by checking other military facilities records that have used sumps for their document incinerator process.
6. **Page 4-3, Section 4.2** Include information regarding when the stormwater channel was lined with concrete.
7. **Page 4-3, Paragraph 2, Line 7** Table 4-1 should be updated regarding Xylenes with up to date values and provide the source where the information was obtained.
8. **Page 4-8, Paragraph 1, Line 2** Delete the word "trace" from the sentence, since lead was a constituent during the Former Firefighter Training School operations.
9. **Page 4-9, Paragraph 2, Line 10** Provide additional information which could be obtained from another base that used this type of Fire Fighter Training School. The information could help identify chemicals of concern that might have been used at the site.
10. **Page 4-8, Section 4.2.6 and 4.2.8** Delete the last sentence at the end of each paragraph. The sentence is stated as "The contents of the suction pumps appear to drain into the storm water channel" as it does not relate to each of these sections.
11. **Page 4-8, Section 4.2.6** Provide more information about the chemical content of the foam used for fire fighting at the facility by either checking with other military facilities with similar operations for a Firefighting Training School or getting the formulae of foam actually used.
12. **Page 4-10, Table 4-2** Provide source for the information presented in this table and check the solubility values for the chemicals presented.
13. **Page 4-12, Paragraph 1, Line 1** Provide more information with respect to toxicity and/or carcinogenicity of Triox.

14. **Page 5-3, Table 5-2** Provide source where information was obtained.
15. **Page 7-1, Paragraph 3, Line 1** States that "one may only speculate on the likelihood of a suspected release to soil at this site." This part of the sentence should be re-stated because not enough information exists to determine the likelihood of a suspected release to soils at Site 4.
16. **Page 7-1, Paragraph 4, Line 1** States that "the likelihood of a suspected release to the groundwater is highly speculative based upon the amount of time since a potential release could have occurred." This part of the sentence should be re-stated because not enough information exists to determine the likelihood of a suspected release to groundwater at Site 4.
17. **Page 7-6, Paragraph 5, Line 3** Please re-state or delete the sentence which begins with "However, civilian populationsat Site 6 would not be allowed" because civilians have access to enter SDNTC.
18. **Page 7-7, Paragraph 2, Line 8** Please re-state or delete the sentence starting with "Nearby populations along Rosecrans Streetof soil is not possible." Civilians are allowed to enter to the Naval Training Center.
19. **Page 8-1, Paragraph 7, Line 6** The sentence beginning with "A Site Inspection (SI) is necessary..... at Site 5." The sentence that follows should be deleted because it is duplication of the sentence mentioned.