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July 5, 1995

Ms. Content Garriga  
Remedial Project Manager, Mail Code 1832.CG  
Southwest Division Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5187

**RE:** Comments on draft document for POIs No.s 7, 16, 20, 26, 28, 29, 46, 48, 57, 59, 60, 61, and 62 entitled: **Draft Work Plan Site Assessment, Naval Training Center, San Diego, California**

Dear Ms. Garriga:

Both the Regional Water Quality Control Board (RWQCB) staff and County of San Diego, Site Assessment and Mitigation (SA/M) Division staff have reviewed appropriate sections of the **Draft Work Plan Site Assessment** report and Attachment A, **Draft Field Sampling Plan**, for Points of Interest (POIs) No.s 7, 16, 20, 26, 28, 29, 46, 48, 57, 59, 60, 61, and 62, dated May, 8 1995. This work plan was prepared by Bechtel National, Inc. for Southwest Division Naval Facilities Engineering Command in accordance with CTO-0082. These comments were discussed in detail with Ms. Content Garriga on June 23, 1995.

The objective of the Site Assessment is to evaluate the need for further action at the sites referenced above. Data to be collected include physical and chemical characteristics of subsurface soil. Do to the shallow depth to groundwater (5 to 9 feet), chemical characteristics of potential concern, and historic use at the POIs the RWQCB staff and SA/M staff recommend that the Site Assessment also include limited groundwater sampling. RWQCB staff understand that concurrent studies will overlap at the following pairs of POIs and Sites: POI 7 and Site 10; POI 16 and Site 11; POI 57 and Site 8, which may reduce the need for further assessment at these POIs.

The RWQCB staff also feel that the Sample Location Rationale should be strengthened in future work plans in order to substantiate recommended work, including sample depth, location, and type of analysis. The rationale should do more than reiterate general descriptions that have been previously stated in earlier sections of the report.

**SUMMARY OF COMMENTS**

- 1 POI No. 7 Include assessment of "grease pit" with adjacent paint spray pits. Due to the small area of concern,

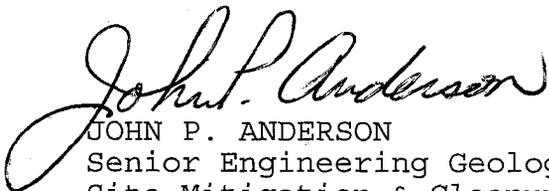
- consider reducing the number of sample locations proposed for the "hazardous waste storage area". Include assessment of the concrete storm water catch basin adjacent to "parts dip tanks". Assess potential groundwater impact in the area of Building 188. Collect soil samples at/near the top of the groundwater surface and modify sampling protocol where subsurface structures of concern extend below five feet. Provide an amended sampling protocol if additional hydraulic lifts or underground storage tanks (USTs) are located by the GPR survey. Describe geographic extent of the proposed GPR survey. Replace EPA Method 8010 analysis with a more appropriate screening method, EPA Method 8240, and include Method 418.1, and 6010/7000 (metals) for a representative number of samples in the "grease pit", "parts dip" and "hydraulic lift" areas.
- 2 POI No. 16 RWQCB staff proposes that you incorporate this work into the Site 11 Geoservices Site Assessment. Assessment in this area must include EPA Method 8015 modified for stoddard solvent. Collect soil samples at/near the top of the groundwater surface. The operations area must also be assessed and include additional sample points in the areas of "piping", "floor sumps", "still", "sludge tank", "settling tank" and "oil/water separator". Consider including a GPR survey to locate the oil/water separator in the western portion of Building 226.
  - 3 POI No. 20 Due to the small area of concern, consider reducing the number of sample locations required for assessment. Assess the potential for groundwater impacts in area. Collect soil samples at/near the top of the groundwater surface. Analyze a smaller representative subset of samples for EPA Method 8080 and 6010/7000 and include pesticides from the EPA 8080 analysis. Replace EPA Method 8010 analysis with the more appropriate screening method, EPA Method 8240.
  - 4 POI No. 26 Include assessment of "grease pit", "steam cleaning area" and "hydraulic lift" with adjacent "sump" borings and collect soil samples below these structures at/near the top of the groundwater surface. Representative soil samples should be screened using the following analyses, EPA Method 8240 and 6010/7000. Provide an amended sampling protocol if additional hydraulic lifts or USTs are located in the GPR survey.
  - 5 POI No. 28 No comment.
  - 6 POI No. 29 What were the results of the groundwater samples collected in the previous investigation?

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- 7 POI No. 46 Conduct limited soil and groundwater sampling at this site, unless adequate information on adjacent sites can be provided. Analyze for EPA Method 8010 and EPA Method 8015 modified for stoddard solvent.
- 8 POI No. 48 Replace EPA Method 8010 analysis with EPA Method 8240 and include EPA Method 8080.
- 9 POI No. 57 Soil sample analysis for Method 418.1 is not required because the USTs are identified as gasoline tanks and TPH Method 8015 has also been proposed. Include soil and groundwater analyses for EPA Method 8020. Groundwater should be sampled in the area of the USTs to assess the potential for groundwater impacts. This work may be incorporated into the adjacent Site 8 (expanded) assessment.
- 10 POI No. 59,60,61 No comment.
- 11 POI No. 62 No comment.

If you have any questions concerning these comments, please contact Corey Walsh at (619) 467-2980.

Sincerely,



JOHN P. ANDERSON  
Senior Engineering Geologist  
Site Mitigation & Cleanup Unit

cc: Ms. Vickie Church, County of San Diego, Department of Environmental Health, SA/M Division, P.O. Box 85261, San Diego, California 92186-5261

Mr. Phillip Dyck, BRAC Environmental Coordinator (BEC), Naval Training Center, 33502 Decatur Road, Suite 120, San Diego, California 92133-1449

Ms. Alice Gimeno, California Environmental Protection Agency, Department of Toxics Substances Control, Office of Military Facilities, Region 4, 245 West Broadway, Suite 425, Long Beach, California 90802-4444

Ms. Claire Trombadore, U.S. EPA, Region IX, (H-9-2), Hazardous Waste Management Division, 75 Hawthorne Street, San Francisco, California 94105-3901