

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN DIEGO REGION

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February 7, 1996

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, CA 90802-4444

RE: Comment resolution sheet "**Response to Agency Comments**",
dated January 9, 1996, on the document entitled Draft Work
Plan Sediment Characterization of Boat Channel, dated
October 1995.

Dear Ms. Gimeno:

Staff have received and reviewed the subject document. The work
plan was prepared by Bechtel National, Inc. for Southwest
Division Naval Facilities Engineering Command in accordance with
CTO-0092.

The Navy has not adequately responded to our November 14, 1995
comments. The following specific comments require additional
rationale:

INITIAL RWQCB COMMENT NO. 2:

Assure sample collection depths extend through entire estuarine
deposits to the native soil contact.

NAVY RESPONSE 2:

Cores ... "will be collected from a maximum depth of 6 feet ... It
is not the intent of this investigation to analyze the entire
depositional zone that has been formed subsequent to the
formation of the Boat Channel."

RWQCB RESPONSE:

In order to identify Naval Training Center's historic
contribution of contaminants to the Boat Channel, all cores
should be advanced to native soil regardless of depth unless
sufficient documentation can be provided to support an alternative
elevation.

INITIAL RWQCB COMMENT NO. 3:

The proposed division of each core into six (approximately one
foot long) subsections should take into account physical
characteristics of the sediment (e.g. depositional intervals).

NAVY RESPONSE 3:

"... The cores will be subsectioned into three subsections consisting of surface, approximately 1 to 4 feet, and 4 to 7 feet below the bottom surface of the Boat Channel."

RWQCB RESPONSE:

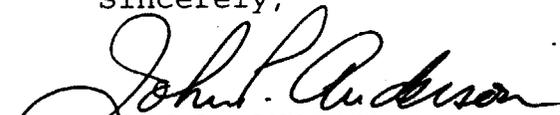
We believe that the proposed reduction in the number of samples to be analyzed per sediment core will seriously reduce the characterization of Boat Channel sediments. We understand that the purpose of the sediment characterization is to: (1) determine the presence and general distribution of contaminants; and (2) if contaminants are present, to evaluate the potential biological effect. We believe that the proposed reduction in sampling will accomplish neither purpose.

While the proposed composite sampling of 3-foot sections of cores may be sufficient to evaluate potential disposal options for dredged sediment, (since mixing of the sediment can be expected to occur prior to disposal), such composite sampling is not adequate to evaluate the environmental threat which is posed by leaving the same sediment in place. During scouring events and/or bioturbation, deeper sediments can become increasingly exposed and available to both benthic life and bay waters. Such increased exposure of deeper sediments can be expected to take place incrementally, and unless the sediments are homogenous in both grain size and contaminant levels, the environmental effects of such incremental exposure will not be constant. Analyses of sediment cores in 3-foot segments will provide insufficient data to predict the potential environmental consequences of the incremental exposure of such sediments.

We believe that unless an assurance can be provided that the sediments in the Boat Channel will never be eroded, future exposure of such sediments through erosion and/or bioturbation should be anticipated, and the potential environmental consequences of such exposure should be evaluated.

If you have any questions concerning this letter, please contact Corey Walsh at (619) 467-2980 or Greg Peters (619) 467-2976.

Sincerely,



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

Ms. Alice Gimeno

- 3 -

February 7, 1996

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