

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Division 4
West Broadway, Suite 425
Long Beach, CA 90802-4444
(310) 590-4856

CODE 18

1996 FEB -6 PM 1:18



February 2, 1996

Mr. Phillip Dyck
BRAC Environmental Coordinator
Naval Training Center-Environmental Office
33502 Decatur Road, Suite 120
San Diego, California 92133-5000

**BACKGROUND ISSUE FOR DRAFT EXTENDED SITE INSPECTION (ESI) REPORT
FOR THE INACTIVE LANDFILL AT NAVAL TRAINING CENTER (NTC),
SAN DIEGO, CALIFORNIA**

Dear Mr. Dyck:

The Department of Toxic Substances Control (DTSC) is very concerned with the outcome of the January 29, 1996 phone conference between the Navy and regulators to discuss the background issue at the inactive Naval Training Center (NTC) landfill. The regulatory agencies present were the U.S. Environmental Protection Agency (USEPA), the Regional Water Quality Control Board (RWQCB), and the Integrated Waste Management Board. The phone conference did not resolve regulator concerns regarding the background issue.

A technical meeting was held on November 30, 1995 to discuss unresolved comments in the draft Extended Site Inspection (ESI) report. DTSC stated that the Navy's method for background calculation using the upper 95 percent confidence limit of the 95th percentile (upper tolerance limit) or UTL (95,95) was unacceptable for the small data set at NTC. DTSC proposed using 80 percent of the lower confidence limit on the 95th percentile or (80,95). The Navy stated it would evaluate the approach and discuss it further with DTSC toxicologist Brian Davis. However, as of the date of our conference call on January 29, 1996, no communication had been made with the DTSC toxicologist.

During the conference call, the Navy's statistician was not present and therefore meaningful discussion about the statistical validity of NTC's data set and the methodology used could not take place. Instead, the Navy used an internal policy as the basis for staying with the UTL (95,95) method. DTSC and USEPA stated that Mare Island Naval Shipyard used the (80,95) method because of its small data set and that other military bases have used the (80,95) method when it was appropriate. The Navy proposed adding more background data to NTC by using North Island Naval Air Station data. Both DTSC and USEPA find this alternative questionable and reject it, especially when an appropriate method already exists to correct the situation.



Mr. Phillip Dyck
February 2, 1996
Page 2

DTSC, USEPA, the Navy, and the community have been working together to maintain progress at NTC by using methods to establish background levels that are appropriate and defensible. We would like to continue this progress. We hope that the Navy reconsiders this issue. If you would like to discuss this issue further, please contact me at (310)590-5563 or Dr. Brian Davis at (916)327-2493.

Sincerely,



Alice Gimeno
Base Closure Team
Office of Military Facilities
Southern California Operations

cc: Brian Davis, Ph.D
Department of Toxic Substances Control
Office of Scientific Affairs
400 P Street
P.O. Box 806
Sacramento, California 95812-0806

Mr. Corey Walsh
Regional Water Quality Control Board
San Diego Region
9771 Clairmont Mesa Boulevard, Suite B
San Diego, California 92124-1331

Ms. Claire Trombadore
Mr. Martin Hausladen
U.S. Environmental Protection Agency
Region IX, H-9-2
Hazardous Waste Management Division
75 Hawthorne Street
San Francisco, California 94105

Mr. Phillip Dyck
February 2, 1996
Page 3

cc: Ms. Content Garriga
✓ Mr. Faiq Aljabi
Southwest Division Naval Facilities Engineering Command
1220 Pacific Highway, Room 18
San Diego, California 92132-5181

Ms. Vickie Church
County of San Diego
Department of Environmental Health
Site Assessment and Mitigation
P.O. Box 85261
San Diego, California 92186-5261