

RESPONSE TO COMMENTS
 PRE-FINAL REMOVAL ACTION WORKPLAN
 INSTALLATION RESTORATION SITE 14, FORMER SMALL ARMS RANGE NO. 2
 FORMER NAVAL TRAINING CENTER
 SAN DIEGO, CALIFORNIA
 CONTRACT NUMBER N47408-92-D-3059 DELIVERY ORDER NUMBER 0006

Comments by: Martin Hausladen, USEPA Region IX
 Dated: June 30, 1999
 Response by: Pete Everds, Project Manager, Foster Wheeler Environmental Corporation
 Dated: July 12, 1999

Number	Reference (Page, section, etc.)	Comment	Response
		General Comments to the Work Plan:	
1		The Draft Work Plan is generally of high quality	Concur.
		Specific Comments to the Work Plan:	
1	Figure 4-1	The proposed haul route using Rosecrans Street is not desirable because it goes through residential areas and it is generally busy during normal business hours. To reduce impact to the public, hauling on either Harbor Drive using Gate 10 or on Barnett Street using Gate 7 may be more preferable.	SWDIV is aware that the trucking activities may impact the community along the haul route, and has taken proactive measures including Community Outreach. This involves preparing a Fact Sheet, which will be mailed to the local community prior to construction. The Fact Sheet will include the results and conclusions of a Traffic Study; which will be prepared to evaluate potential trucking routes and schedules, and the impact of the trucking activities on the local community.
2	FSP Page A.4-2, Section 4.2, pp 2; Figure A.4-2; and Page 5-2, Section 5.4 of the Work Plan	The number of confirmation samples on the floor of the excavated areas should be increased. One confirmation sample should be located in close vicinity of the location of the highest contamination observed in the area. As a guide, 4-5 samples per excavation area would be preferred.	Concur. Plans and Figures 5-1 and A.4-2 will be revised to indicate approximately 20 additional confirmation floor samples will be collected, and sample locations will be revised to place them where previous investigations indicated the highest concentration.
3	FSP Page A.4-2, Section 4.3; and Page 5-2, Section 5.5 of the Work Plan	The number of waste characterization samples proposed (1 sample per 100 yd ³) appears to be low.	Concur. Section 4.3 of Appendix A Field Sampling Plan (FSP) and summary Section 5.5 of the Work Plan will be revised to indicate that the number of waste classification samples will be increased from approximately 7 composite samples to 17 composite samples. Since each composite sample will include 4 discrete samples, approximately 68 discrete samples will be collected for the 2,000 cubic yards of waste (1 sample per 30 cubic yards). This sampling frequency is consistent with guidance provided in the San Diego County SAM Manual, and was also approved by the Facility Manager of Laidlaw Westmoreland, the proposed disposal facility.
4	Pages A.4-1 and A.4-2, Section 4.1	Pre-construction samples for TCLP, STLC, and TTLC analysis could be counted towards the total number of waste characterization samples.	Concur.

5	Pages A.4-1 and A.4-2, Section 4.1	XRF samples could be also counted provided correlation between TCLP, STLC and TTLC laboratory results and total lead counts obtained by XRF can be correlated. FWENC proposed that XRF would be included in the pre-construction sampling, and that samples tested with XRF will be sent for laboratory analysis to establish correlation.	Concur. XRF analysis will be performed in addition to laboratory analysis on the 10 pre-construction samples for correlation. This will ensure that the XRF and lab analysis are performed on the same soil samples, and will provide more accuracy than comparing lab results to XRF results from previous sampling activities.
6	Page A.4-2, Section 4.3	The rationale of the total number for the proposed waste stockpiles needs to be revisited.	See response to Comment 3.
7	Page iv and in text	USEPA should be used instead of EPA.	Concur. Revised the Acronym List and where EPA is used in text.
8	Page 1-1, pp 1, second to last sentence; and page A.1.1, Section 1.0, last pp	The lead regulatory agency is the RWQCB needs to be reflected in the text.	Concur. Plan revised to indicate that the RWQCB is the lead regulatory agency on page 1-1 and A.1-1.
9	Page 2-2, Section 2.1.2, fifth sentence	The text needs clarification.	Concur. Plan revised to indicate shooters fired weapons.
10	Page 4-1, Section 4.3.1	APCD needs to be notified regarding temporary waste staging.	Concur. Plan revised to include Section 4.3.1. Notifications, which will include notification of waste staging piles to the APCD, and field activities in general to the Lindbergh Field FAA.
11	Page 4-1, Section 4.3.1	FAA, Lindbergh Field needs to be notified regarding the proposed removal action.	Concur. See response to Comment 10.
12	Page 4-2, Section 4.3.2	RWQCB and USEPA need to be invited to the pre-mobilization conference.	Concur. Plan revised accordingly.
13	Page 5-2, Section 5.4	Needs revisiting as discussed above.	Concur. See response to Comment 2.
14	Page 5-2, Section 5.5	Needs revisiting as discussed above.	Concur. See response to Comment 3.
15	Page 5-2, Section 5.6	Needs revisiting as discussed above.	Concur. See response to Comment 1.
16	Page 6-1, Section 6.1	Photo and video records are also recommended.	Concur. Plan revised accordingly.
17	Page A.1-1, Section 1.0, last pp	Specify RWQCB as lead regulatory agency.	Concur. Plan revised accordingly.
18	Page E. 6-1, Section 6.2, pp 1	Posting needs to be made in English and Spanish.	Concur. Plan revised accordingly.
19	Page E. 8-1, Section 8.3, second sentence	If the regulators require stoppage of the work, they will contact SWDIV RPM (Muckerman).	Concur. Plan revised accordingly.

Comments by: Corey Walsh, California Regional Water Quality Control Board, San Diego Region
 Dated: July 20, 1999
 Response by: Pete Everds, Project Manager, Foster Wheeler Environmental Corporation
 Dated: July 23, 1999

Number	Reference (Page, section, etc.)	Comment	Response
1	Page 5-2, Section 5.5, last sentence	Please verify applicability of 40 CFR Section 300.440 (known as "off-site rule") to this IR site.	Pursuant to Section 6.2.4 of the Navy/Marine Corps Installation Restoration Manual, a disposal facility used for the off-site management of CERCLA wastes must be in compliance with RCRA. These requirements are applicable to remedial action at Navy/Marine Corps sites when wastes are being transported off-site for treatment or disposal. The EPA maintains a list of acceptable off-site disposal facilities (these are Class I). To summarize, since the Action Memo and the Work Plan indicate that the removal action is being performed under CERCLA, the Offsite Rule applies.
2	Page 5-2, Section 5.4, pp1; and FSP page A.4-2, pp2	Please provide leachability analysis for the 3 metals of concern during confirmation sampling. Analyze representative soil samples using a modified DI-WET analysis. Also consider leachability analysis on Non-hazardous pre-construction samples.	A study will be performed as part of the site Closure Report to evaluate the leachability of the 3 metals of concern in soils left in place at the excavation boundary which are below the cleanup criteria. This study will include using analytical results (total metals, DI-WET tests on confirmation samples) and evaluation methodologies (fate and transport modeling, Designated Level Methodology, USEPA leachate models) as necessary to confirm that residual concentrations of soil contaminants do not pose a threat to San Diego Bay by leaching to groundwater. The results of this study will be compared to appropriate water quality standards for the bay (i.e., Bay and Estuary Standards) to confirm that the cleanup criteria for the site are protective of human health and the environment.
3	Page 2-7, Section 2.3.2, last paragraph	Explain inconsistency between the volume of impacted soil stated in the Action Memo (3,240 bank cubic yards [bcy]), and the Work Plan (1,900 bcy).	The 1,900 bcy of soil to be excavated per the Work Plan is based on Figure 2-6, Proposed Excavation Map. Pursuant to conversations with Bechtel National, the 3,240 bcy from the Action Memo and the EE/CA was based on the following rationale. An EE/CA is designed to compare different removal action alternatives. The same estimate of the areal extent of contamination must be used for all alternatives (Alternative 1, excavation and off-site disposal; Alternative 2, <i>ex.situ</i> electrokinetic remediation; and Alternative 3, capping). The area used to calculate the soil volume was a conservative estimate. The soil volume (3,240 loose cubic yards [lcy]; 4,050 tons) was calculated using this conservative area. The Removal Action Work Plan is designed to refine the chosen alternative and therefore, the volume estimate was revised to minimize removal of any potentially uncontaminated soil.
4	See USEPA Comment No. 2	I concur with the EPA's request for more confirmation samples.	Approximately 20 additional confirmation samples will be collected, and the Work Plan will be revised accordingly.

5	General Comment	Determine applicability of notification requirements pursuant to California Health and Safety Code 25158, and EPA Section 6930 of Title 42 United States Code. Notification may be required for removal actions involving hazardous waste.	Since the base has an EPA ID Number (CA217002320202523) and is required to file a Hazardous Waste Generator Report on a biennial basis, this requirement is probably satisfied. The Work Plan also serves as notification. Additional notification will be provided if applicable.
6	Page 3-2, Section 3.6	Provide a copy of the Community Health and Safety Plan. Was it used to provide details of the proposed remedial activities to the community?	A copy of the Community Health and Safety Plan will be provided to the RWQCB. SWDIV has determined that mailing a 2 page Fact Sheet to the local residents would be the most efficient means of providing the details of the proposed remedial activities to the community. A copy will be mailed to the RWQCB.
7	General Comment	Did Bechtel National perform any total or soluble metal analysis during the ESA for correlation with the XRF data?	Bechtel National has indicated that based on discussions with the regulatory agencies, no total or soluble metals analysis were required or performed during the ESA for correlation with the XRF data.
8	Page 5-3, Section 5.7	Where is the imported fill coming from and why is it being analyzed for VOCs etc.?	The source of the imported fill has not been determined, and will be based on availability at the backfill contractors borrow site. Only certified-clean, non-processed native soils will be used. Limited verification sampling of the proposed material (2 samples) will be performed for quality assurance.
9	Appendix C, Page C.5-1, second and third bullet	Correct definition/criteria for characterization of CA Hazardous waste and Non-Hazardous waste, i.e. 1,000mg/kg not 350 mg/kg.	Concur. AB2784 indicates that soils with total lead concentration >350mg/kg must be disposed at a Class I Hazardous Waste landfill; but does not indicate that the criteria of 1,000 mg/kg lead for California-hazardous waste has been changed.
Comments by: Charles B. Bishop, Restoration Advisory Board Dated: July 19, 1999 Response by: Pete Everds, Project Manager, Foster Wheeler Environmental Corporation Dated: July 22, 1999			
Number	Reference (Page, section, etc.)	Comment	Response
1	Page 2-2, Section 2.1.2	The Work Plan is written clearly and provides all the necessary information, except for any mention of how the offending material migrated from the enclosed sandpit to a wide area surrounding the building location. Neither Section 2.2.2 nor 2.3.2 cover this relevant piece of information on the background of the Site. Note that the history of "how it happened" is included in the documents for other Sites.	Section 2.1.2 indicates that it is unknown whether the sand trap material was removed before the building was demolished. It appears that the contaminated soil from the sand trap was most likely distributed across the area during building demolition and surface grading.
2	General Comment	It will be interesting to learn the final cost of disposal of 1900 cu. yds. (2.3.2), 3000 tons (5.6) of surface soil.	The final disposal costs will be available from the Navy at project completion.

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TRANSMITTAL/DELIVERABLE RECEIPT

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TO: Contracting Officer
 Naval Facilities Engineering Command
 Southwest Division
 Mr. Richard Lovering, 02R.RL
 1220 Pacific Highway
 San Diego, CA 92132-5190

DATE: 08/05/99
 CTO: 0006
 LOCATION: NTC San Diego

FROM: Neil Hart (For)
 Neil Hart, Program Manager

DESCRIPTION: Final Response to Comments for CTO 0006, Removal Action For Installation Restoration, 08/05/99

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 Other

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Date/Time Received



FOSTER WHEELER ENVIRONMENTAL CORPORATION

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August 5, 1999
FWSD-RAC-99-0298
5.0

Contracting Officer (Code 5S02.RP)
Naval Facilities Engineering Command
Southwest Division
Attn: Ms. Melita Orpilla
1220 Pacific Highway
San Diego, CA 92132-5190

SUBJECT: FINAL RESPONSE TO COMMENTS FOR CONTRACT TASK ORDER 0006,
REMOVAL ACTION FOR INSTALLATION RESTORATION SITE 14
FORMER SMALL ARMS RANGE AT FORMER NAVAL TRAINING
CENTER,
SAN DIEGO, CA

Reference: Contract N68711-98-D-5713, Environmental Remedial Action Contract
for Sites in Southern California, Arizona, New Mexico and Southern Nevada

Dear Ms. Orpilla,

Foster Wheeler is pleased to provide you with the attached Final Response to Comments for Contract Task Order (CTO) 0006, Removal Action for Installation Restoration Site 14, Former Naval Training Center, San Diego, CA. The Response to Comments will be incorporated into the Final Removal Action Work Plan.

If you have any questions or concerns, please contact my Project Manager, Mr. Pete Everds at (619) 234-8696 x204.

Sincerely,

Carol Hart (Foe)

Neil Hart
Program Manager

Enclosures

