



# California Regional Water Quality Control Board

## San Diego Region



**Winston H. Hickox**  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov/~rwqcb9>  
9771 Clairemont Mesa Boulevard, Suite A, San Diego, California 92124-1324  
Phone (858) 467-2952 • FAX (858) 571-6972

**Gray Davis**  
Governor

**N00247.000587**  
**NTC SAN DIEGO**  
**SSIC #5090.3**

August 19, 1999

Mr. Keith Forman  
BRAC Environmental Coordinator  
BRAC Program Office, Code 05BN.KF  
1420 Kettner Boulevard, Suite 501  
San Diego, CA 92101-2404

Dear Mr. Forman:

**RE: REVISED DRAFT ENGINEERING EVALUATION/COST ANALYSIS (EE/CA)  
NON-TIME CRITICAL REMOVAL ACTION FOR SITE 1, INACTIVE  
LANDFILL, FORMER NAVAL TRAINING CENTER (NTC), SAN DIEGO**

The Regional Water Quality Control Board (RWQCB) has completed review of the above referenced document, dated July 15, 1999. The document was prepared by Bechtel National, Inc. on behalf of Southwest Division Naval Facilities Engineering Command (SWDIV) in accordance with Contract Task Order CTO-0128/0149. The purpose of the revised EE/CA is to identify and analyze "removal action" alternatives which will reduce the potential for human and ecological exposure to landfill wastes, to reduce potential for development of leachate, and to reduce landfill gas generation.

### GENERAL COMMENTS

Please note that you have been previously notified of the signature requirements for draft documents and other appropriate technical reports that require registered professional review. The RWQCB will not continue to review draft or final technical reports without the appropriate registered professional signatures included. California Business and Professions Code Sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgments be performed by or under the direction of registered professionals. Please remind your consultants that all, including draft, technical reports (e.g. Engineering Evaluation/Cost Analysis, etc.) must bear the stamp or signature (including license number) of all the appropriate registered professionals. Geologic boring and trench logs must also bear the stamp or signature of a California registered geologist (RG) or certified engineering geologist (CEG) in order to verify proper supervision and to establish responsibility. This is in accordance with the Business and Professional Code, Chapter 12.5 - Geologist and Geophysicists Act Section 7800.

*California Environmental Protection Agency*

## **SPECIFIC COMMENTS**

### **1.) 2.1.3 Regulatory History**

Include reference to RWQCB Resolution 59-R20 for Requirements Regulating the Discharge of Wastes from a Sanitary Landfill to be Operated by the United States Marine Corps, San Diego. This permit was issued for the discharge of specified wastes at the former MCRD landfill (Site 1), and has subsequently been rescinded.

### **2.) Figure 2-4 Current Sewer and Utility Lines**

Please include the location of all existing active and inactive utility lines (e.g. original sewer line, etc.)

### **3.) 2.1.7 Sensitive Ecosystems**

Please provide the "cooperative agreement to mitigate the loss of the California least tern nesting habitat" for the site, which the U.S. Fish and Wildlife Service (USFWS) and the San Diego Unified Port District entered into on April 1999. Describe any management and/or maintenance requirements, and schedule for implementation at the former NTC site.

### **4.) Figure 2-13 Distribution of Organic Compounds**

Please provide the complete original investigation reference, date completed, etc. of material presented in this and other figures.

### **5.) 4.1 Alternate 1-Excavate Landfill Waste and Dispose Off-site**

This alternative evaluated "complete removal of all landfill material and residuals" referred to as clean closure. Please include in this evaluation the consolidation and/or partial clean closure options we have discussed in numerous meetings with you and the IWMB.

### **6.) 4.2 Alternative 2 and 4.3 Alternative 3**

The descriptions of alternatives 2 and 3 include "maintenance of a positive drainage on the soil cover and asphaltic pavement". Based on our meeting on August 3, 1999, we understand that the soil cover maintenance will consist of "rough grading" to promote drainage and minimize infiltration. This is the same type of landfill maintenance, which has been performed by the Navy over the past couple of years.

Regional Board staff has conducted inspections of the landfill during the rainy season and have noted ponding on the landfill surface, and a failure (differential settlement) of the existing pavement cover. These recent violations resulted in the Regional Board staff issuance of a Notice to Comply, dated December 11, 1997, for failure to maintain the landfill cover, based on the large amount of ponded water on the landfill surface. Ponding seems to be a recurring problem at this landfill. This indicates that the current landfill maintenance program and cover is **inadequate**. Ponding on the landfill surface may infiltrate through the buried waste and cause adverse impacts to ground water and potential adverse impacts to San Diego Bay. The slope of the landfill cover needs to be sufficient to provide adequate run on and runoff protection. In addition, stormwater flows will need to be collected and drained offsite.

A general description of the additional work required to be performed to ensure adequate runoff and runoff protection must be included in the revised EE/CA. The removal/mitigation of sand used for the construction and maintenance of the former least tern nesting area must also be addressed in the revised EE/CA. The responsible party will need to develop a grading plan, in the Remedial Design phase, to ensure adequate drainage of stormwater runoff from the landfill. These factors will need to be included in the descriptions and cost estimates for Alternatives 2 and 3.

#### 7.) Ground Water Monitoring

Alternatives 2 and 3 indicate that groundwater will be sampled semiannually for 5 years, then annually thereafter for 25 years. The ground water monitoring requirements for Site 1 landfill are contained in the General Waste Discharge Requirements, Monitoring and Reporting Program No. 97-11. If the responsible party wants a reduction in the ground water monitoring frequency, documentation will need to be provided to demonstrate that less frequent ground water monitoring is warranted. Any change in the ground water monitoring program will need to be approved by the Executive Officer.

Alternatives 2 and 3 also discuss long-term ground water monitoring, including the detection of leachate. If, in the future, there is a release from the landfill (e.g., ground water quality degrades further) the responsible party (or parties) will need to conduct corrective action. This may include treatment of the ground water or the addition of a prescriptive landfill cover, in accordance with Division 2, Title 27 of the California Code of Regulations. These factors will also need to be included in the cost estimate for the revised EE/CA.

#### 8.) Appendix A-ARARs

Post-closure maintenance and monitoring ARARs or to-be-considered (TBC) for use in the investigation and cleanup of waste(s) at Site 1 Inactive Landfill, were submitted to Southwest

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Revised Draft EE/CA Site 1  
NTC, San Diego

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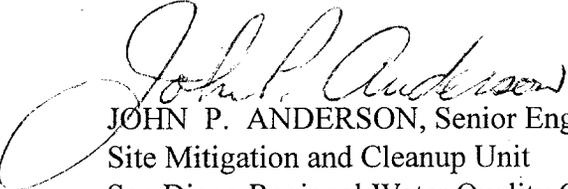
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Division Naval, in August 23, 1995; May 22, 1996; and more specific ARARs in November 30, 1998. The following ARARs were not addressed in the revised draft EE/CA:

1. RWQCB Order No. 95-25, NPDES No. CAG919001, General Waste Discharge Requirements for Groundwater Extraction and Similar Waste Discharges to San Diego Bay and Storm Drains or other conveyance systems tributary thereto. This order establishes procedural requirements and discharge limitations for ground water extraction waste discharges associated with ground water dewatering operations and ground water remediation systems into San Diego Bay and storm drains or other conveyance systems tributary thereto.
2. California Toxics Rule (Proposed) Will bring California into compliance with Section 303(c)(2)(B) Of the Clean Water Act (CWA). Regulatory reference 40 Code of Federal Regulations (CFR) Section 131.38 Federal Register, Vol. 62, No. 150, 42160-42208. This plan will establish numeric criteria for priority toxic pollutants in the State of California for inland surface waters and enclosed bays and estuaries.

Please contact Corey Walsh at (858) 467-2980 or Carol Tamaki at (858) 467-2982 if you have any questions regarding this letter.

Sincerely,

  
JOHN P. ANDERSON, Senior Engineering Geologist  
Site Mitigation and Cleanup Unit  
San Diego Regional Water Quality Control Board  
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**FILE: 30-0092.N02**  
**NTC Site 1**

cc:

Ms. Content Arnold, Remedial Project Manager, BRAC Operations Office, Code 05BS.CA,  
1420 Kettner Blvd. Suite 501, San Diego, CA 92101-2404

Mr. Glenn Young, Waste Management Engineer, Closure and Remediation Branch, Integrated  
Waste Management Board, 8800 Cal Center Drive, Sacramento, California 95826

Mr. Martin Hausladen, U.S. EPA, Region IX, (H-9-2), Hazardous Waste Management Division,  
75 Hawthorne Street, San Francisco, CA 94105-3901

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Mr. Bill Paznokas, California Department of Fish and Game, 4949 Viewridge Ave., San Diego,  
CA 92123

Mr. Rick Adcock, San Diego Unified Port District, P.O. Box 120488, San Diego, CA 92112

Ms. Betsy Weisman, City San Diego, NTC Reuse Project Director, 202 C Street, MS3A, San  
Diego, CA 92101

Mr. Paul Manasjan, City of San Diego, Local Enforcement Agency, Mail Code MS501, 1222  
First Avenue, San Diego, CA 92101-4155

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