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Department of
Toxic Substances
Control

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**RESPONSE TO COMMENTS FOR DRAFT EXTENDED SITE ASSESSMENT
REPORT FOR 18 POINTS OF INTEREST (POIs) AT NAVAL TRAINING
CENTER (NTC), SAN DIEGO**

Dear Mr. Forman:

The Department of Toxic Substances Control (DTSC) and the California Regional Quality Control Board (RWQCB) have completed our review of the response to comments for the Draft Extended Site Assessment Report for 18 POIs. We find that the responses were generally adequate. However, in reviewing the rationale for some of the "Conclusions and Recommendations" for the POIs in the draft report, we have the following comments:

Section 4, Conclusions and Recommendations:

1. A general statement is made as a rationale for several POIs that "Arsenic ... appears to be naturally occurring at NTC and other Navy bases in the San Diego area..." The background concentrations of Arsenic and other naturally occurring metals at NTC have not been substantiated by the Navy through background studies; therefore, the use of this rationale as a conclusion for No Further Action is not acceptable. For most POIs, the deletion of this rationale from the conclusion will not change the appropriateness of "No Further Action" because of the result of the residential risk screening evaluation. It is recommended that references to "naturally occurring" metals be removed from the conclusions of this report for all POIs.
2. For each bullet that discusses soil risk screening results, please specify if the conclusion is based on carcinogenic or non-carcinogenic risks. For example, the conclusion for POI 19, the third bullet should indicate that the result of total carcinogenic risk is between 10^{-4} and 10^{-6} .

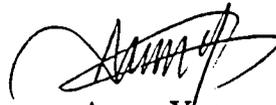
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3. The State disagrees with the hypothesis of Page 4-179, paragraph 2 as a rationale for the high metal concentrations in the Northeast groundwater study. The Navy suggested that the "water in the Boat Channel may be contributing to the higher metals in groundwater (near the boat channel)." It is unlikely that the water in the Boat Channel can be causing the high concentration of metals detected in the ground water in light of the variability found through out NTC. If this is the Navy's theory, it should be justified by citing surface water metal concentrations from the Boat Channel. Current ground water gradients indicate that the ground water, in general, is flowing toward the Boat Channel. Please delete this paragraph.

Please note that although the State is satisfied with the response to regulatory comments, we may still be in disagreement with the "No Further Action" recommendation for the North East Ground Water POI of the draft Site Assessment Report. The State believes that until additional study is conducted regarding the background metal concentrations at NTC, we cannot concur with No Further Action for the ground water.

If you have any questions regarding the above comments, you may contact me at (562) 590-4897.

Sincerely,



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Remedial Project Manager

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