



California Regional Water Quality Control Board

San Diego Region



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Protection

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November 25, 1998

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

Dear Mr. Forman:

RE: DRAFT EE/CA for SITE 14 (formerly POI 29) FORMER SMALL ARMS RANGE NO. 2, NAVAL TRAINING CENTER, SAN DIEGO

Regional Water Quality Control Board (RWQCB) staff has completed our review of the Draft Engineering Evaluation/Cost Analysis (EE/CA) Non-Time Critical Removal Action for the subject site, dated October 5, 1998. The report was prepared by Bechtel National Inc. on behalf of the Southwest Division (SWDiv) Naval Facilities Engineering Command. The Preliminary Draft Action Memorandum for the proposed removal action at Site 14 was reviewed concurrently with the Draft EE/CA. Based on our review of the subject document and discussions with the Navy SWDiv and it's consultants we have the following comments. Most of the specific comments noted below can be applied to the Preliminary Draft Action Memorandum for Site 14 also.

SPECIFIC COMMENTS

1. Page 2-1, Section 2.1.1 **Site Location**

Please indicate the distance from the site to the "nearby boat channel".

2. Page 2-15, Section 2.2, Figure 2-6 **Sampling Locations and Results**

Please provide analytical results from previous investigation by Leroy Crandal for hydropunch sampling locations identified on Figure 2-6.

3. Page 2-18, Section 2.3 **Source, Nature, and Extent of Contamination**

Please include the range in depths where significant (>100 mg/kg lead) soil contamination was detected at the site.

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4. Page 2-24, Section 2.5 **Streamlined Risk Screening**

As stated in this section the adjacent boat channel/San Diego Bay is considered a sensitive ecosystem that could potentially be exposed to surface contaminant runoff.. Therefore, actual or potential contamination of sensitive ecosystems should be included in the factors identified as being applicable for determining the appropriateness of the removal action, pursuant to 40 CFR Section 300.415(b)(2).

5. Page 2-25, Section 2.5.1 **Previous Risk Screening Results**

Why is the maximum concentration of lead used in the risk evaluation? Should other contaminant concentrations and exposure parameters be evaluated in risk evaluation? Please clarify. Why is this section entitled "Previous" when it discusses current risk screening results?

6. Page 2-30, Section 2.5.3 **Documented Exposure Pathways**

Please clarify or rectify the apparent inconsistency of your statement that the site only "poses a minimal threat to human receptors" under the current property use (open space/recreational area, accessible to the public), even though the EE/CA recommends Alternative 1 (excavation and off-site disposal) for the same reuse criteria.

7. Page 4-2, Section 4.1.1.1 **Excavation**

Please indicate that the excavated/stockpiled soils must also be covered and bermed to eliminate wind and water born transport of contaminants from the site as required by Resolution No. 95-96. This and other applicable Resolutions have subsequently been incorporated into the San Diego RWQCB Basin Plan, see Appendix D for conditions of waiver of waste discharge requirements. Any soils classified as hazardous waste pursuant to Title 22, California Code of Regulations (CCR) must be handled appropriately pursuant to Title 22 requirements.

8. Page 4-11, Section 4.1.4 **Cost**

Please correct your reference that contaminated soil identified as "non-RCRA hazardous" be transported to a "licensed Class I disposal facility". This type of waste is not required to be disposed of at a Class I facility, but could be disposed of at either Class II or III facilities.

9. Page 4-20, Section 4.3 **Alternative 3 - Single-Barrier Cap with GCL**

What is the basis for the use of a geosynthetic clay liner (GCL) and three feet of clean imported soil over the lead contaminated soil proposed to be left in-place under this scenario? Why would you need to minimize percolation if infiltration and subsequent transport of contaminants are not

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an issue. How did you determine that three feet of soil would be protective to human health and the environment?

10. Page 4-25, Section 4.4.2 **Implementability**

Please delete your reference to the RWQCB objection to the no action alternative. The RWQCB may not object to Alternative 6 "No Action" if human health and ecological risk analyses indicate an acceptable risk.

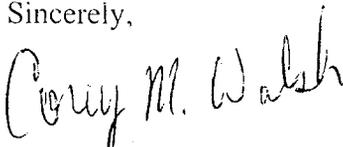
GENERAL COMMENTS

An initial streamlined risk evaluation was conducted using the highest concentration of lead found at the site during a previous investigation of the site to determine if additional work was required. The results of this initial screening indicated that further investigation was warranted and therefore, an Extended Site Assessment/Technical Memorandum was completed. I understand that the results from this study would be used to develop a more site specific risk evaluation that would not necessarily default to using the maximum concentration of lead found at the site. Please explain why a more representative lead concentration should not be used, and/or why the exposure parameters should not be modified to be more representative of the actual current and proposed future use of the site identified as open space/recreational area.

This removal action is considered a discretionary act that requires the Regional Board to comply with CEQA. As the state lead agency for this site the RWQCB will, with your assistance, complete CEQA for this project. We anticipate compliance with CEQA will be completed with a Negative Declaration, or mitigated Negative Declaration, and Initial Environmental Study. The preparation of the CEQA documentation can be concurrent with the preparation of the EE/CA, but probably can not be completed until the Action Memorandum is finalized. The CEQA process may be time consuming, we therefore suggest that you provide us a draft Initial Environmental Study and Negative Declaration as soon as possible.

Please contact me at (619) 467-2980 if you have any questions regarding this letter.

Sincerely,



COREY M. WALSH, Associate Engineering Geologist
Site Mitigation and Cleanup Unit

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FILE: 30-0092.N02 (SITE 14)

CMW:jpa:cmw

Mr. Keith Forman
Draft EE/CA and Action Memo

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cc:

Ms. Content Arnold, Remedial Project Manager, BRAC Operations Office, Code 05BS.CA,
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Mr. Martin Hausladen, U.S. EPA, Region IX, (H-9-2), Hazardous Waste Management Division,
75 Hawthorne Street, San Francisco, CA 94105-3901

California Environmental Protection Agency