



California Regional Water Quality Control Board

San Diego Region



Winston H. Hickox
Secretary for
Environmental
Protection

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NTC SAN DIEGO
SSIC NO. 5090.3

February 19, 1999

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 BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP),
(UPDATE 5), NAVAL TRAINING CENTER (NTC), SAN DIEGO**

The California Regional Water Quality Control Board-San Diego Region (RWQCB) has completed it's review of the above referenced document, dated March 1999. We understand that there are outstanding legal issues and concerns regarding compliance with waste discharge requirements and general industrial storm water permits under National Pollutant Discharge Elimination System (NPDES). These comments are intended to summarize and clarify the status of environmental restoration and associated environmental compliance programs at the former NTC as required in the Base Closure Plan Guidelines. The BCP contains information available as of December 31, 1998 and therefore these comments are specific to this same time period.

Chapter 3, Section 3.2 COMPLIANCE PROGRAM STATUS

1. Page 3-12, Section 3.2.3 Solid Waste Management

Please replace the current paragraph with the following paragraph:

The California Regional Water Quality Control Board-San Diego Region (RWQCB) considers the former NTC to be currently regulated by Order No. 97-11, General Waste Discharge Requirements for Post-Closure Maintenance of Inactive Landfills. The RWQCB found the Navy to be in violation of Order No. 97-11 for failure to submit semi-annual monitoring reports, due October 1997 and April 1998. For this reason, a Notice of Violation was issued to the Navy on May 1, 1998. The Navy submitted the required Maintenance Completion Report; Semiannual Groundwater Monitoring Report on June 22, 1998 and subsequent Annual Maintenance Completion Report; Annual Groundwater Monitoring Report on December 16, 1998. The RWQCB currently considers the facility to be in compliance with Order No. 97-11.

2. Page 3-14, Section 3.2.8 National Pollutant Discharge Elimination System Permits

Please replace the current "Stormwater" paragraph with the following paragraph:

California Environmental Protection Agency

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Mr. Keith Forman
BCP Update 5

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February 19, 1999

The California Regional Water Quality Control Board-San Diego Region (RWQCB) considers the former NTC to be currently regulated by Order No. 97-03-DWQ, the statewide Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities (General Industrial Storm Water Permit). The RWQCB found the Navy to be in violation of Order No. 97-03-DWQ for failure to submit the 1997/98 Annual Report, due July 1, 1998. For this reason, Notice of Violation 98-137 was issued to the Navy on November 6, 1998. To date the Navy has failed to submit the required report.

If you have any questions regarding this letter, please contact me at (619) 467-2980.

Sincerely,



COREY M. WALSH, Associate Engineering Geologist
Site Mitigation and Cleanup Unit
San Diego Regional Water Quality Control Board

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FILE: 30-0092.N02
06-0035.01
10-1856.01

CMW:jpa:dsj:cmw

cc:

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

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