

INITIAL STUDY

PROJECT TITLE: Draft Work Plan Time-Critical Removal Action Installation Restoration Program Site 2, Sub-Sites 2B, 2C, and 2G, Naval Base San Diego		CALSTARS CODING: CA 37970012
PROJECT LOCATION: Naval Base San Diego	CITY: San Diego	COUNTY: San Diego
PROJECT SPONSOR: Naval Facilities Engineering Command	CONTACT: Darren L. Belton, RPM	PHONE: (619) 556-7617

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:			
<input type="checkbox"/> Initial Permit Issuance	<input type="checkbox"/> Permit Renewal	<input type="checkbox"/> Permit Modification	<input type="checkbox"/> Closure Plan
<input type="checkbox"/> Removal Action Workplan	<input checked="" type="checkbox"/> Remedial Action Plan	<input type="checkbox"/> Interim Removal	<input type="checkbox"/> Regulations
<input type="checkbox"/> Other (specify):			

STATUTORY AUTHORITY:		
<input type="checkbox"/> California H&SC, Chap 6 5	<input checked="" type="checkbox"/> California H&SC, Chap. 6 8	<input type="checkbox"/> Other (specify):

DTSC PROGRAM/ ADDRESS: 5796 Corporate Ave., Cypress, CA 90630	CONTACT: Mr. Douglas Bautista	PHONE: (714)484-5442
---	---	--------------------------------

PROJECT DESCRIPTION:
<p>Under the California Health and Safety Code, section 25356 1, the Department of Toxic Substances Control (DTSC) proposes to approve a Time Critical Removal Action (TCRA) to excavate and dispose off-site, soil contaminated with dioxins, dibenzofurans, and polynuclear aromatic hydrocarbons (PAHs) within a portion of Installation Restoration Program (IRP) Site 2 to eliminate the potential inhalation, dermal contact, and ingestion pathways to current workers and potential ecological receptors. IRP Site 2 is located within the Naval Base San Diego (NBSD) in San Diego, California (Figure 1). This site was created in 1942 with hydraulic fill material. This site is currently used for light industrial purposes including parking lots, a hazardous materials reutilization area, an equipment storage area, Navy offices (Building 3141), a recycling yard, and an equipment laydown area.</p> <p>IRP Site 2 is a 23-acre triangular area bounded by Channel Lane and Paleta Creek to the north, Mole Road to the south, and Cummings Road to the east, and is divided into seven Sub-sites: Sub-sites 2A through 2G (Figure 2). Soil excavation and disposal activities are planned specifically at Sub-sites 2B, 2C, and 2G, which have a combined area of approximately 6 1 acres</p> <p>Background/History:</p> <p>Naval Base San Diego is currently an active military base and is situated south of the downtown San Diego area along the eastern shore of San Diego Bay (Fig 1) In 1921, the U.S. Navy San Diego Destroyer Base began operations at NBSD for the purpose of maintaining decommissioned World War I destroyers. The size of the base increased in subsequent years through multiple land acquisitions and facilities development with most growth occurring after the Naval Repair Base was established in 1943 From 1943 until the end of World War II, more than 5,000 ships were sent to the Naval Repair Base for conversion, overhaul, battle damage repair, and maintenance In 1946, the Naval Repair Base was re-designated as Naval Station San Diego. In 2005, the name was changed to Naval Base San Diego NBSD currently comprises 1,029 land acres and 326 water acres.</p>

Portions of Mole Pier were reportedly used for the disposal and open burning of various types of demolition debris and hazardous waste from approximately 1945 to 1972. The disposal and open burning area was previously primarily addressed by the Non-Time-Critical Removal Action (NTCRA) performed at Sub-site 2A between 2000 and 2003, when 83,000 cubic yards of soil was excavated and removed from Site 2.

The objective of this removal action is to excavate and remove the top 2.5 to 3 feet of surface soil at Sub-site 2B, 2C, and 2G, and backfill to approximately 6-inch minus grade using clean import fill material. Approximately 23,000 cubic yards of soil will be excavated and removed from the site. The off-site disposal of soil will include approximately 1,500 truck trips between NBSD and the disposal facility. The area will be brought to final grade with base material and asphalt to match the surrounding pavement. Prior to excavation, a land survey, radiological survey, underground utility search, and site clearing will be conducted.

In addition, damaged pavement at Sub-Site 2B will be repaired as a part of this removal action, which will remove the potential pathways for soil to contact potential receptors. The soil removal and pavement restoration activities are anticipated to begin in April 2007, and be completed by August 2007.

PROJECT ACTIVITIES:

Sub-site 2B: Sub-site 2B is approximately 1.6 acres in size and formerly housed the hazardous materials reutilization area. It is currently primarily vacant. Sub-site 2B is within the area used in the late 1970s for storage, scraping, and painting of brows (gang planks) and platforms. Hazardous materials potentially utilized during these activities reportedly include paint, paint thinner, lacquer, red lead, and zinc chromate. The storage, scraping, and painting areas were reported to have been unpaved at the time. Currently, approximately 91.5 percent of Sub-site 2B is paved; however some paving is distressed. Based on the results of the Navy's 2005 Remedial Investigation, the Cal/EPA estimated cancer risk for the industrial worker (the current and most likely receptor) at Sub-site 2B is 4.7×10^{-4} . If approved, the TCRA work plan will allow the Navy to conduct the following activities at Sub-site 2B:

- Remove and replace damaged and distressed pavement within Sub-site 2B.
- Transport excavated pavement to an authorized facility for treatment/recycling.

No impact to human or environment health or safety is anticipated for this activity.

Sub-site 2C: Sub-site 2C is approximately 1.5 acres in size and encompasses the area of the former ball fields. The surface of the western portion of Sub-site 2C is gravel, while the surface on the eastern side is bare soil. Sub-site 2C is within the area formerly used for the storage, scraping, and painting of brows and platforms. Hazardous materials potentially utilized during these activities included paint, paint thinner, lacquer, red lead, and zinc chromate. In addition, the area of the ball fields might have been used as a landfill. In 1995 and 1996, approximately 4,000 cubic yards of thermally treated soil was spread over the surface of the ball field adjacent to the Wharf Builder's Yard. This soil originated from Sub-site 2G and might have included soil from Building 132 (automotive maintenance facility). Sub-site 2C is currently fenced and functions as an equipment storage area. Based on the results of the Navy's 2005 Remedial Investigation, the Cal/EPA estimated cancer risk for the industrial worker (the current and most likely receptor) at Sub-site 2C is 2.5×10^{-5} . If approved, the TCRA work plan will allow the Navy to conduct the following activities at Sub-site 2C:

- Excavate and dispose of the upper 2.5 to 3.0 feet of soil contaminated with dioxins, dibenzofurans, and PAH. Approximately 7,000 cubic yards of soil is anticipated for removal.
- Transport the excavated soil to an appropriate landfill for recycling in accordance with applicable federal, state, and local regulations.
- Backfill or re-grade to ensure at least 2.5 to 3 feet of clean soil is placed over the Sub-site.

Sub-site 2G: Sub-site 2G is approximately 3.9 acres in size and is composed of two major areas: the Wharf Builder's Yard and the former west ball field, which is now an equipment lay down area. The Wharf Builder's Yard is the northern portion of the Sub-site 2G, located along Seventh Street. Pretreated wooden piles were stored directly on the bare ground within this yard until 1994, when the piles were moved onto a slab.

A two-phase non-CERCLA soil cleanup action was performed at Sub-site 2G. The surface soil was removed from an area of the Wharf Builder's Yard, and soil was also removed from a former disposal pit to approximately

10 feet below ground surface (bgs) Approximately 16,000 cubic yards of excavated soil was thermally treated on-site, along with about 2,000 cubic yards of hydraulic fluid-impacted soil from Building 132 While most of the treated soil was used to backfill the excavated areas at Sub-site 2G, approximately 4,000 cubic yards of excess soil was spread in a 2-foot lift on the ball field adjacent to the Wharf Builder's Yard. Based on the results of the Navy's 2005 Remedial Investigation, the Cal/EPA estimated cancer risk for the industrial worker (the current and most likely receptor) at Sub-site 2G is 1.1×10^{-4} .

If approved, the TCRA work plan will allow the Navy to conduct the following activities at Sub-site 2G:

- Excavate and dispose of the upper 2.5 to 3.0 feet of soil contaminated with dioxins, dibenzofurans, and PAH. Approximately 18,000 cubic yards of soil is anticipated for removal.
- Transport the excavated soil to an appropriate landfill for recycling in accordance with applicable federal, state, and local regulations
- Backfill or re-grade to ensure at least 2.5 to 3 feet of clean soil is placed over the Sub-site.

The general scope of work to be performed at both Sub-sites 2C and 2G includes the following:

- Remove existing pavement and excavate soil to depths of 2.5 to 3 feet bgs;
- Conduct monitoring for health and safety concerns;
- Enforce a speed limit of 25 miles per hour to reduce dust;
- Suspend excavation activities when wind speed exceeds a sustained 35 miles per hour;
- Apply water to the soil, if necessary, for dust control;
- Cover trucks transporting soils from the site with tarps;
- Avoid residential areas for truck transportation of import and export soil;
- Establish field survey monuments;
- Collect waste characterization samples of the soil for acceptance by a landfill;
- Obtain certified laboratory data to verify remaining, in-place soil conditions;
- Backfill or re-grade to ensure at least 2.5 to 3 feet of clean soil is placed over the Sub-sites;
- Screen the excavated soil for radioactive contamination;
- Remove site features such as existing pavement and fencing prior to start the job (utility or utility poles removal is not anticipated);

Multiple environmental investigations have been performed at IRP Site 2. The most recent is the IRP Site 2 Remedial Investigation, issued by the Navy in draft form in 2005. This RI, and associated revised risk assessments for each sub-site, provide the Navy's basis for this TCRA at Sub-sites 2B, 2C, and 2G.

There are no historical buildings or structures within the removal areas. The area is constructed of hydraulically emplaced dredged fill material from San Diego Bay with conventional fill on top. Consequently, there is no evidence or expectation to encounter Native American burial sites or similar archeological protected artifacts of interest and archeological monitoring will therefore not be required.

HUMAN HEALTH RISK ASSESSMENT:

The site-specific total cancer risk for the industrial worker at Sub-site 2B was 5.5×10^{-4} and 4.7×10^{-4} , and 1.1×10^{-4} and 9.9×10^{-5} for the construction worker, using the U.S. EPA and Cal/EPA toxicity factors, respectively. The hazard indices (HIs) for the industrial worker scenario was 0.45 and for the construction worker scenario 1.6. For Sub-site 2C, the calculated human cancer risks were 1.7×10^{-5} and 2.5×10^{-5} for the industrial worker, and 1.4×10^{-5} and 1.6×10^{-5} for the construction worker. The HIs were 0.44 and 1.4 respectively. Applying the same toxicity factors to Sub-site 2G, the cancer risks were calculated to be 1.2×10^{-4} and 1.1×10^{-4} for the industrial worker, and 2.3×10^{-4} and 2.6×10^{-4} for the construction worker. The HIs for the industrial worker scenario was 1.7, and for the construction worker scenario 1.8.

Consequently, the upper 2.5 to 3.0 feet will be excavated to remove the source of the high concentrations of dioxins, dibenzofurans and PAHs from Sub-sites 2C and 2G. Once the soil has been removed and replaced with clean import fill, the areas will be paved. For Sub-site 2B, the remedial action will be restoration of cracks and distressed pavement to ensure a more complete cover and eliminate exposure pathways.

The attributes of the risks indicate that removal of the contaminated material is required to mitigate potential threats to public health. The threats posed by the contaminated surface soil in Sub-sites 2B, 2C and 2G are time-critical based upon the cancer risk and HIs in combination of the current use of the area by Department of the Navy (DON) personnel under industrial use conditions. The established health risks are further supported by

visual observations regarding exposed soils in unpaved or distressed surfaces and the results of the remedial investigation.

ECOLOGICAL RISK ASSESSMENT:

Due to the barren habitat and industrial setting, no terrestrial receptors have been identified at IRP Site 2; however, the main threat to the ecological receptors is contaminated unpaved surface soil migrating from the site by either storm water transport or as fugitive dust to aquatic receptors. Since this TCRA includes removing contaminated soil and paving excavated areas with asphalt to mitigate risks to public health or welfare, these actions can reasonably be expected to be protective of ecological receptors near the site as well.

REFERENCE:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California.

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

ENVIRONMENTAL IMPACT ANALYSIS: *The following pages provide a brief description of the physical environmental resources that exist within the area affected by the proposed project and an analysis of whether or not those resources will potentially impacted by the proposed project. Preparation of this section follows guidance provided in DTSC's [California Environmental Quality Act Initial Study Workbook \[Workbook\]](#). A list of references used to support the following discussion and analysis are contained in Attachment A and are referenced within each section below.*

Mitigation measures which are made a part of the project (e.g.: permit condition) or which are required under a separate Mitigation Measure Monitoring or Reporting Plan which either avoid or reduce impacts to a level of insignificance are identified in the analysis within each section.

1. Aesthetics

Project Activities Likely to Create an Impact:

The time-critical removal action is intended to prevent contact of contaminated soil with human and ecological receptors at the site by excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and damaged pavement to ensure a more complete cover and eliminate exposure pathways are also planned at Sub-site 2B. The project itself will not change the current use of the site, and no permanent structures will be removed or built.

Description of Baseline Environmental Conditions:

The surface geologic units at IRP Site 2 included conventionally emplaced fill and hydraulically emplaced/dredge fill. The conventionally emplaced fill consists primarily of sand, silty sand, sandy clay, silty gravel, and in some occasion organic clay. Discharge of surface-water runoff from IRP Site 2 occurs via existing drain systems or by sheet runoff to Paleta Creek channel and/or San Diego Bay. The vegetation is sparse. Yearly rainfall average is less than 10 inches. Infiltration of rain water may occur in areas where the pavement is absent, such as Sub-site 2C, or deteriorated pavement, such as southernmost portion of Sub-site 2G, and various location in Sub-site 2B.

Analysis as to whether or not project activities would:

- a. Have a substantial adverse effect on a scenic vista.

Impact Analysis: The TCRA is intended to reduce the contaminants in the soil at the Sub-sites 2B, 2C and 2G to a level that is protective of human health and ecological receptors. At the end of the removal action, the disturbed

areas will be backfilled and restored to surrounding grade. The project itself will not change the current use of the site and no structures will be constructed. The project will not change the grade or current land appearance. The land will be restored to the surrounding grade.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c Substantially degrade the existing visual character or quality of the site and its surroundings.

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d Create a new source of substantial light of glare that would adversely affect day or nighttime views in the area.

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

2. Agricultural Resources

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure

pathways are planned at Sub-site 2B The project itself will not change the current use of the site, and no permanent structures will be removed or built

Description of Baseline Environmental Conditions:

The surface geologic units at IRP Site 2 included conventionally emplaced fill and hydraulically emplaced/dredge fill. The conventionally emplaced fill consists primarily of sand, silty sand, sandy clay, silty gravel, and in some occasion organic clay No agriculture has been performed at this location, as the site was created in 1942 by emplacing dredge material from San Diego Bay to create made land for Navy use. The saline nature of the dredge material is not conducive to agricultural use

Analysis as to whether or not project activities would:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

Impact Analysis: IRP Site 2 has been utilized for military purposes, and is not anticipated to be utilized for agricultural purposes. Therefore, the removal action will occur in non-agricultural land. IRP Site 2 has been part of an active military base since early 1940s. Therefore, the project will not change or convert the usage of the site.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

Impact Analysis: See Impact Analysis for “a” above.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

Impact Analysis: See Impact Analysis for “a” above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California.

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

3. Air Quality

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B. The project itself will not change the current use of the site, and no structures will be removed or built. Following is the tasks that have a potential for generating dust during field activities:

- Vehicle traffic on dirt roads;
- Excavation of soil;
- Screening of soil;
- Loading of trucks; and
- Backfill of excavation

Description of Baseline Environmental Conditions:

The surface geologic units at IRP Site 2 include conventionally emplaced fill and hydraulically emplaced/dredge fill. The conventionally emplaced fill consists primarily of sand, silty sand, sandy clay, silty gravel, and in some occasion organic clay. By resulting in a finished condition of 100% paved areas at Sub-sites 2B, -2C, and 2G, the removal of the fugitive dust potential pathway will be accomplished.

Analysis as to whether or not project activities would:

a. Conflict with or obstruct implementation of the applicable air quality plan

Impact Analysis: Particulate emissions (PM_{10}) from construction activities are the greatest concern with respect to construction activities. Since PM_{10} emissions can result in substantial increases in local concentrations of PM_{10} , there may be the potential for significant impact characterized by a local exceedance of an air quality standard, unless appropriate project control and air monitoring employed. The San Diego Air Pollution Control District is the oversight agency for dust control and air monitoring at the NBSD. The activities will be subject to the requirements of the Federal Clean Air Act of 1970, as amended in 1977 and 1990, and the San Diego Air Pollution Control District regulations for air monitoring and dust control requirement at the site.

To control the dust generated from vehicular traffic on dirt roads, a maximum speed of 25 miles per hour will be strictly enforced and the dust from the dirt roads will be controlled by applying water directly on the soil using a water truck. Similarly, dust generated during excavation will be controlled by applying water directly to the excavation area. Additionally, to reduce soil particles being airborne, trucks will be covered with tarp.

The objectives of the air monitoring program will be:

- Determine background dust levels at the site;
- Measure potential impacts of construction; and
- Conduct personnel monitoring for health and safety concern.

Prior to excavation activities, background samples for dust will be collected with a direct reading dust monitor (Mini Ram PDM3 or equivalent). During excavation activities the site perimeter will be monitored periodically, with a minimum frequency of at least once per day and with greater frequency depending on site activities. Monitoring will be conducted both upwind and downwind to assess impacts from off site sources. An air monitoring permit will not be required.

With the application of the project controls described above, air quality impacts will be avoided.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation

Impact Analysis: See Impact Analysis for "a" above. Through the use of project controls for dust monitoring, impacts to air quality will be avoided.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Impact Analysis: See Impact Analysis for "a" above. Through the use of project controls for dust monitoring, impacts to air quality will be avoided. Each day, a small number of trucks will transport the soil to an off-site location. This is not anticipated to have an impact on air quality of the region.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis: See Impact Analysis for "a, b, and c" above. Through the use of project controls for dust monitoring, impacts to air quality will be avoided.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Create objectionable odors affecting a substantial number of people.

Impact Analysis: See Impact Analysis for "a" above. No odor is anticipated to be generated that may have an effect on the nearby/downwind residences.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils).

Impact Analysis: See Impact Analysis for "a through e" above. Asbestos is not present, anthropogenically or naturally at the site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California.

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

4. Biological Resources

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B. The project itself will not change the current use of the site, and no permanent structures will be removed or built.

Description of Baseline Environmental Conditions:

IRP Site 2 is an industrial, 23-acre area. Current land use includes parking, materials recycling, equipment storage and laydown, welding activities, and office space. Significant terrestrial habitat and receptors are not present at Site 2. The project site is located adjacent to San Diego Bay, and aquatic receptors are present within the bay.

Analysis as to whether or not project activities would:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis: The project location is entirely industrial in nature. No sensitive plant species are known to occur on NBSD. Only one native plant community was identified on NBSD, an area of southern coastal salt marsh located at Paleta Creek. This salt marsh community is highly disturbed from channelization and therefore, does not support the full complement of salt marsh species. Additionally, no reptile or amphibian species were identified at NBSD.

According to the California Department of Fish and Game there are a few marine resources of concern. According to a 1994/1995 biological survey conducted by others, 38 bird species were observed at NBSD. Four of the 38 birds are listed as sensitive species. In addition, 56 other bird species are known to occur in the northern two-third of San Diego Bay and may occur at NBSD. Most notably, California least tern nesting activity was recorded at NBSD. The California least tern is a federal and state endangered species. Only one mammal species, the gray fox, was observed during the 1994/1995 biological survey at the bank of Paleta Creek. No wetland areas have been delineated at IRP Site 2.

Sub-sites 2B, 2C, and 2G have been utilized for a variety of activities by the Navy since they were created by depositing dredged material from the San Diego Bay in 1942. Based on the historical use, it is unlikely that any candidate, sensitive, or special terrestrial plants or animal species are located at these Sub-sites or will be impacted by this project.

Because the project is located adjacent to San Diego Bay, best management practices will be necessary to ensure that soil is managed properly to avoid excess fugitive soil or dust from reaching San Diego Bay and potential aquatic receptors.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated

- Less Than Significant Impact
 No Impact

- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc) through direct removal, filling, hydrological interruption, or other means.

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California

Mr. Frank Gray, California Department of Fish and Game, Office of Spill Prevention and Response, Email dated February 20, 2007

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

5. Cultural Resources

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B. The project itself will not change the current use of the site, and no permanent structures will be removed or built.

Description of Baseline Environmental Conditions:

The surface geologic units at IRP Site 2 included conventionally emplaced fill and hydraulically emplaced/dredge fill to a depth of at least 10 feet below ground surface. Prior to the area being created with made land in 1941 to 1942, the project site was under water in San Diego Bay. Therefore, archeological or cultural resources are not likely to be present within the upper three feet of soil at the site.

Analysis as to whether or not project activities would:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5

Impact Analysis: Two archeological sites have been identified at NBSD. Neither site is in the vicinity of IRP Site 2. There are no known significant cultural features located at IRP Site 2. The Native American Heritage Commission performed a record search of its Sacred Lands File (SLF) for the Site. The SLF did not indicate the presence of Native American cultural resources in the immediate project area.

Because IRP Site 2 was created as made land in the early 1940s, cultural features are not present on the site itself. Because the NBSD is heavily urbanized, the probability of additional significant archeological finds is low.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact

No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California.

Native American Heritage Commission Letter dated August 28, 2006.

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

6. Geology and Soils

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B. The project itself will not change the current use of the site, and no permanent structures will be removed or built.

Description of Baseline Environmental Conditions:

The geologic units at IRP Site 2 included conventionally emplaced fill and hydraulically emplaced/dredge fill to the total depth (3 feet bgs) proposed for excavation. The conventionally emplaced fill consists primarily of sand, silty sand, sandy clay, silty gravel, and in some occasion organic clay. The site is primarily flat lying, with only 3 to 4 feet of grade change across the entire TCRA proposed area. Sensitive soil conditions, liquefiable soils, and landslide conditions are not likely to be encountered.

Analysis as to whether or not project activities would:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - ❖ Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42).
 - ❖ Strong seismic ground shaking
 - ❖ Seismic-related ground failure, including liquefaction.
 - ❖ Landslides

Impact Analysis: No known active fault is located directly on the site. The southern end of the Rose Canyon Fault zone and related faulting, when projected along the axis of San Diego Bay, passes less than one mile west of the NBSD. Imported clean soil will be imported from off-site facilities and placed in 6-inch lifts, wetted with water, and compacted. The surface soil will be graded to prevent ponding of storm water runoff. The shallow limited excavations at the Sub-sites should not have any affect on the area.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Result in substantial soil erosion or the loss of topsoil.

Impact Analysis: Erosion of soil generally occurs during rainy season. Following soil excavation at Sub-sites 2C and 2G, certified clean soil will be placed in 6-inch lifts, and compacted to approximately 90 percent. The project will not contribute to soil erosion at the Sub-sites.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse

Impact Analysis: IRP Site 2 is not known to overlay any geologic unit that is unstable or would become unstable as a result of the project or potentially result in landslide, lateral spreading, subsidence, liquefaction or collapse.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Impact Analysis: IRP Site 2 is not underlain by expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994)

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of water

Impact Analysis: Not applicable to this project. This project will not change use of the Sub-sites, and septic systems are not used, as the area is connected to a sanitary waste water system.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Be located in an area containing naturally occurring asbestos (see also Air Quality, f.)

Impact Analysis: Sub-sites do not contain naturally occurring asbestos

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California.

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

7. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B. The project itself will not change the current use of the site, and no permanent structures will be removed or built.

Description of Baseline Environmental Conditions:

The site is an Installation Restoration Program (IRP) Site. It has documented contamination in the upper 2 to 3 feet of soil, as identified in the Draft Remedial Investigation. Contaminants include dioxins, dibenzofurans, and polynuclear aromatic hydrocarbons (PAHs).

Analysis as to whether or not project activities would:

- a. Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials

Impact Analysis: Primary chemical of concerns for this project are dioxins, dibenzofurans, and PAHs. Licensed/qualified hazardous waste haulers will be contracted in transporting excavated soil from the site for off-site delivery. Trucks will be covered with tarps and will follow routes that are less congested (main highways and freeways) to avoid populated communities. Hauling trucks will be cleaned to remove dust particles that could become air borne before the trucks are sent out. The trucks will be parked outside of the exclusion zone, and the exterior of the trucks will not come into contact with contaminated soil. As an additional safeguard, the tires of the trucks will be scrapped and/or swept for dirt prior to leaving the site. The trucks will be weighed, and a Hazardous Waste Manifest will be prepared for signature by the Navy representative. The soil will be transported to permitted facility.

Work zones will be established prior to initiating excavation operations. An exclusion zone will be established around the operation area defining the area of real or potential contamination. Contamination reduction zones (CRZs) will then be established at designated entrance points around the exclusion zone. Personnel access control at the CRZ will ensure that no personnel enter that exclusion zone who do not meet proper personal protective equipment and training requirements. CRZs will also be delineated with caution tape.

Sub-sites 2C and 2G are not active ranges or are located within the vicinity of an active range. Therefore, unexploded ordnances (UXO) are not anticipated to be found in these Sub-sites. However, excavated soil will be visually inspected for the presence of UXO, and handled by Navy EOD personnel if encountered.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact Analysis: Accidental soil spilling from the trucks will be handled by Navy personnel and the contract company performing the excavation. Trucks transporting the material will be secured with tarps to minimize release of materials.

during transportation Excavation and loading of soil into trucks will be suspended, when wind speed exceed 25 miles per hour.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school. The truck route from the base to Interstate 5 is less than 1/2 mile and does not pass near existing or proposed schools

Impact Analysis: No schools are located within 1/2 mile of the site. Additionally, there are no known acutely hazardous materials, substances or wastes at the site. Particulate/air monitoring will be conducted during the project and adequate measure to protect human health and the environment will be implemented following the safety plan.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to public or the environment.

Impact Analysis: Sub-sites 2B, -2C, and 2G are part of Installation Restoration Program (IRP) Site 2, which is being investigated and cleaned up pursuant to the Navy's CERCLA authority. The purpose of this TCRA is to reduce the level of contaminants in the soil. The project will not create a significant hazard to public and environment, and will ultimately reduce the potential risk to human health and the environment.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- e. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan

Impact Analysis: The project will not impair implementation nor interfere with any emergency or evacuation plan. Possible emergencies will be responded by site contract personnel in coordination with base emergency personnel.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

8. Hydrology and Water Quality

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B. The project itself will not change the current use of the site, and no permanent structures will be removed or built.

Description of Baseline Environmental Conditions:

The surface geologic units at IRP Site 2 included conventionally emplaced fill and hydraulically emplaced/dredge fill. Portions of Sub-sites 2B, -2C, and 2G are currently unpaved, and contain dioxin, dibenzofuran, and PAH impacted soil. These conditions (unpaved and contaminated soil) can result in potentially contaminated runoff during rainfall events and potentially, infiltration of rain water through unpaved areas.

Analysis as to whether or not project activities would:

a. Violate any water quality standards or waste discharge requirements.

Impact Analysis: Approximately 25,000 cubic yards of contaminated soil is anticipated to be removed and replaced with clean imported soil at Sub-sites 2C and 2G. In the event of rain or flood, runoff of sediments containing chemicals of concern (COC) to surface water may occur. Therefore, placement of silt fences or hay bales around the excavation areas to prevent runoff of sediments from the area may be required. Precautions will also be taken to minimize storm water run-on to the active portions of the excavation areas. However, no changes to the overall drainage patterns at the site will occur as a result of this project.

Contamination prevention and response measures will be provided during excavation as follow:

- Both Sub-sites will be thoroughly inspected prior to initiating field activities. The purpose of the inspection will be to observe the drainage pattern at the site and to plan for waste management;
- Physical controls will be implemented to minimize run-on/runoff, if required. These include sand bags, hay bales, polyethylene sheeting material, and other temporary controls;
- The work site will be cleaned periodically and stockpiles removed frequently. All debris will be removed in a timely fashion.

Clean fill material will be brought in from off-site and transported to the site. Soil will be placed in 6-inch lifts, wetted with water, and compacted with a rubber-tired compactor. The area will be graded to prevent ponding of storm water runoff. The project will not extend to groundwater depth and therefore, will not impact groundwater in the area.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficient in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- d Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- e Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- f Otherwise substantially degrade water quality.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- g Place within a 100-flood hazard area structures which would impede or redirect flood flows.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- h Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

i Inundation by sieche, tsunami or mudflow.

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California.

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

9. Land Use and Planning

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B. The project itself will not change the current use of the site, and no permanent structures will be removed or built.

Description of Baseline Environmental Conditions:

The surface geologic units at IRP Site 2 included conventionally emplaced fill and hydraulically emplaced/dredge fill. The site is industrial in nature (recycling facility, storage, parking and offices), and land use is not expected to be changed.

Analysis as to whether or not project activities would:

- a Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect

Impact Analysis: The project itself will not change the current use of the site. Sub-sites 2B, 2C and 2G are within NBSD and controlled by the Navy. The project includes clean-up of surface soils and repaving, with continued industrial use of the site upon completion of the project. There will be no conflict with the current Navy property use.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- b. Conflict with any applicable habitat conservation plan or natural community conservation plan.

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact

No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

10. Mineral Resources

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B.

Description of Baseline Environmental Conditions:

The surface geologic units at IRP Site 2 included conventionally emplaced fill and hydraulically emplaced/dredge fill. Subsurface geology includes Quaternary bay deposits, and undifferentiated terrace deposits of the Bay Point Formation. The conventionally emplaced fill consists primarily of sand, silty sand, sandy clay, silty gravel, and in some occasion organic clay. *No mineral resources have been identified at or near NBSD. There are no viable oil or gas resources known within San Diego County.*

Analysis as to whether or not project activities would:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Impact Analysis: Sub-sites 2B, 2C, and 2G have been constructed by dredging materials from the San Diego Bay. There are no mineral resource recovery or mining activities at the site. The site usage will not change due to the project activities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California.

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

11. Noise

Project Activities Likely to Create an Impact:

Description of Baseline Environmental Conditions:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B. This project will include the use of excavation and earth moving equipment, and numerous truck trips for hauling soil (both from and to the site)

Description of Baseline Environmental Conditions:

NBSD is located adjacent to Interstate 5, a heavily used freeway. In addition, NBSD is located adjacent to both San Diego Bay and maritime related noise. A light rail trolley and an active rail right-of-way cross NBSD from north to south. Noise consistent with these activities is a daily occurrence at NBSD.

Analysis as to whether or not project activities would:

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies

Impact Analysis: Heavy equipment for excavating, hauling, and backfilling will be utilized for this project. Site personnel will be provided with personnel protective equipment including noise reduction equipment. No schools or office/commercial building is located in the immediate vicinity of the Sub-sites 2C and 2G that could be impacted.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- b. Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- c. A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California.

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

12. Population and Housing

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B.

Description of Baseline Environmental Conditions:

The project will be performed over a footprint of less than 10 acres within the industrial portion of NBSD. Residential housing is not located within 1/2 mile of the project site.

Analysis as to whether or not project activities would:

- a Induce substantial population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

Impact Analysis: There are no residential or commercial buildings in close proximity of the Sub-sites 2B, 2C, and 2G. The sites usage will not be changed by this project. No buildings will be removed or constructed at the site. In addition, the duration of the project is estimated at six months. There will be no need for housing for personnel working on the project since they will be commuting everyday.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- c Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California

13. Public Services

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B.

Description of Baseline Environmental Conditions:

The project will be conducted within an industrial/military area. The surface geologic units at IRP Site 2 included conventionally emplaced fill and hydraulically emplaced/dredge fill. Portions of the surface soil at Sub-sites 2B, -2C, and 2G are unpaved, and contamination has been identified in surface soils. No public service providers (fire, hospital, police) are located within the project footprint.

Analysis as to whether or not project activities would:

- a Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

- ❖ Fire protection
- Police protection
- Schools
- ❖ Parks
- ❖ Other public facilities

Impact Analysis: Workforce for the project will commute to and from the base and into the site every working day. On some occasions, or when needed, extended time of work may be required. Approximate work force is estimated to be between 10 and 15 personnel per day. Personnel working in the project will only stay at the site during their shift and only through the duration of the project. In the event of fire or explosion, the local fire department and police will be called upon. Sub-sites 2B, 2C, and 2G are located within NBSD, and no schools or parks are located within the project vicinity.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact

No Impact

References Used:

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California

14. Recreation

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B.

Description of Baseline Environmental Conditions:

There are no existing recreation-related facilities within the project footprint. The nearest recreation areas are two volleyball courts that are located approximately 100 feet to the west of Sub-site 2G, and an outdoor basketball court located approximately 500 feet southwest of Sub-site 2B.

Analysis as to whether or not project activities would:

- a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact Analysis: Workforce for the project will commute to and from the base and into the sites every working day on an 8 hour shift. On some occasions, or when needed, extended time of work may be required. Approximate work force is estimated to be between 10 and 15 personnel per day. Personnel working in the project will only stay at the site during their shift and only through the duration of the project. Sub-sites 2B, 2C, and 2G are located within NBSD and no parks or recreational facility are located within the project vicinity.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California.

15. Transportation and Traffic

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B. Disposal of soil and import of clean fill material will result in ___ truck trips to and from NBSD in support of this project.

Description of Baseline Environmental Conditions:

The project site is located within the industrial area of NBSD, and within one mile of the Port of San Diego's 24th Street Marine Terminal, which has a large number of truck trips on a daily basis. The site is also located within ½ mile of Interstate 5, and its large volume of both commuter and commercial traffic.

Analysis as to whether or not project activities would:

During fieldwork, the site will generate an average of 15 one-way passenger vehicle trips per day during the construction activities, which are estimated to be completed within approximately 164 workdays. Approximately 4,633 one-way commercial truck trips will be required during the entire project. This number includes mobilization and demobilization of heavy equipment (20 loads); transportation and delivery of soil fill material to the site (2,124 loads), off-site transportation of contaminated soil, asphalt and debris (2,474 loads), and transportation and delivery of asphalt pavement material to the site (15 loads).

Heavy traffic generated by this project will use Interstate 5, 8th Street and Harbor Drive and will enter the Base using Gate 7. Gate 7 is open 24 hours per day, 7 days per week. When leaving the Base, heavy traffic will exit via Gate 7 or 9. Workers will enter via Gate 9 and will exit using the same route as they entered or Harbor Drive. Based on data available at the National City Engineering Department, both Harbor Drive and 8th Street (both four-lane streets, two lines each way) are designed to handle 1,600 vehicles per lane per hour. Data from San Diego Association of Governments (SANDAG), which compiles information to present daily traffic counts for specific roads, show the current usage of these streets as follows:

8th Street - 20,200 total number of vehicles per 24 hours or
210 vehicles per hour, if calculated as an average per hour, per lane

Harbor Drive - 13,200 total number of vehicles per 24 hours or
138 vehicles per hour, if calculated as an average per hour, per lane

Based on this data, an average of 29 commercial vehicles per day (58 round trips) over the life of the project associated with the removal activities at the facility will not impact the existing traffic conditions in the area. In addition, the schedules for the delivery and transportation of fill and asphalt material as well as off-site transportation of contaminated soils to landfills will be planned to minimize interference with the normal traffic pattern in the area. Trucks will not enter or exit the site during the hours between 6:30 am to 7:30 am and 3:30 p.m. to 4:30 p.m. in order to avoid peak traffic flow in the area. Trucks will exit the facility at Gate 9, which is a short distance from the Interstate 5 on-ramp. The majority of the trucks will have capacities greater than 20 tons. The project will require permitted oversized vehicles for the transportation of heavy and extra-wide construction equipment.

Due to the limited and relatively short duration of construction activities, the impact to transportation or traffic patterns is expected to be insignificant.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- a. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- b. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- c. Result in inadequate emergency access.

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- d. Result in inadequate parking capacity

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- e. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

References Used:

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California

16. Utilities and Service Systems

Project Activities Likely to Create an Impact:

Excavation of contaminated soil to a depth of 2.5 to 3.0 feet at Sub-sites 2C and 2G, and disposal off-site of contaminated soil. At the end of the removal action, the disturbed areas will be backfilled with imported clean material and returned to surrounding grade. Restoring cracks and distress pavement to ensure a more complete cover and eliminate exposure pathways are planned at Sub-site 2B.

Description of Baseline Environmental Conditions:

Existing utilities within the project footprint include sanitary sewer, potable water, electricity, steam, and telephone transmission lines. Electrical substations, sewer treatment works, telephone trunk systems, generators, and steam generation plants are not present within the project footprint. The utility conduits are routinely located three or more feet below ground surface, and will not be intercepted or effected by the TCRA excavation activities.

Analysis as to whether or not project activities would:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Impact Analysis: Site reconnaissance will be conducted prior to initiation of excavation activities. Utility clearance will be obtained and water sources for dust control will be identified. All necessary permits to conduct this project will be obtained from regulatory agencies. In addition, a storm water pollution plan will be in place throughout the duration of the project. The project itself will not change the current use of the site, and no structures will be removed or built.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed

Impact Analysis: See Impact Analysis for "a" above

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated

- Less Than Significant Impact
 No Impact

- e. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- g. Comply with federal, state, and local statutes and regulations related to solid waste

Impact Analysis: See Impact Analysis for "a" above.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California.

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

FINDING OF DE MINIMIS IMPACT TO FISH, WILDLIFE AND HABITAT (OPTIONAL)¹

The following provides substantial evidence as to why the project will have **no potential for adverse effect** on the listed resources as defined by section 711.2 of the Fish and Game Code:

- a. Riparian land, rivers, streams, watercourse, and wetlands under state and federal jurisdiction.

Discussion:

¹ Complete only if a Finding of De Minimis Impact to fish, wildlife and habitat is proposed in lieu of payment of the Department of Fish and Game Notice of Determination filing fee required pursuant to section 711.4 of the Fish and Game Code. A finding of "no potential adverse effect" must be made to satisfy the requirements for the Finding of De Minimis Impact as required by title 14, California Code of Regulations, section 753.5

Finding:

No potential for adverse effect

- b. Native and non-native plant life and the soil required to sustain habitat for fish and wildlife

Discussion:

Finding:

No potential for adverse effect.

- c. Rare and unique plant life and ecological community's dependent on plant life.

Discussion:

Finding:

No potential for adverse effect

- d. Listed threatened and endangered plant and animals and the habitat in which they are believed to reside

Discussion:

Finding:

No potential for adverse effect.

- e. All species of plant or animals as listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulation adopted there under.

Discussion:

Finding:

No potential for adverse effect

- f. All marine and terrestrial species subject to the jurisdiction of the Department of Fish and Game and the ecological communities in which they reside

Discussion:

Finding:

No potential for adverse effect.

- g. All air and water resources the degradation of which will individually or cumulatively result in a loss of biological diversity among the plants and animals residing in that air and water

Discussion:

Finding:

No potential for adverse effect.

MANDATORY FINDINGS OF SIGNIFICANCE:

Based on evidence provided in this Initial Study, DTSC makes the following findings:

- a. The project has does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory

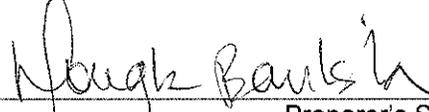
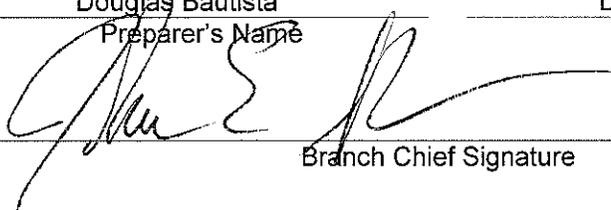
- b. The project has does not have impacts that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects
- c. The project has does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly

DETERMINATION OF APPROPRIATE ENVIRONMENTAL DOCUMENT:

Based on evidence provided in this Initial Study, DTSC makes the following determination:

- The proposed project COULD NOT HAVE a significant effect on the environment. A **Negative Declaration** will be prepared
- The proposed project COULD HAVE a significant effect on the environment. However, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared.
- The proposed project MAY HAVE a significant effect on the environment. An **Environmental Impact Report** is required.
- The proposed project MAY HAVE a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.
- The proposed project COULD HAVE a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.

APPROVALS:

	3/12/07
Preparer's Signature	Date
Douglas Bautista	DTSC Project Manager
Preparer's Name	Preparer's Title
	(714) 484-5442
Branch Chief Signature	Phone #
Branch Chief Name	3/13/07
Branch Chief Name	Date
Branch Chief Title	Phone #
Branch Chief Title	Phone #

ATTACHEMENT A

REFERENCES

Draft Remedial Investigation Report, June 2005, IRP Site 2, Volumes I and II, Naval Station San Diego, California, CTO 0066/0068, prepared by Bechtel Environmental Inc.

Draft Action Memorandum, November 2006, Time-Critical Removal Action, Installation Restoration Program Site 2, Sub-sites 2B, 2C, and 2G, Naval Base San Diego, California.

Draft Work Plan Time-Critical Removal Action Installation Restoration Program site 2 Sub-Sites 2B, 2C, and 2G Naval Base San Diego, San Diego, California

Mr Frank Gray, California Department of Fish and Game, Office of Spill Prevention and Response, Email dated February 20, 2007.

