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Executive Summary				
	i	Executive Summary, Introduction	Paragraph describes preparation of the RIFS document in response to CAO R9-2004-0258 issued by the San Diego Water Board in 2004.	Recommend the paragraph include the reason(s) why the December 2007 draft RIFS is being re-issued in redline in March 2010. The reader should understand what this draft document is responding to or represents.
	i	Executive Summary, Remedial Investigation, First Paragraph	Paragraph describes additional remedial investigations conducted.	Paragraph should also mention the in situ pilot study (Appendix G) conducted in the vicinity of Buildings 131/242.
	i	Executive Summary, Remedial Investigation, Second Paragraph	"The results of the two bench-scale studies are presented."	Paragraph should also mention the in situ pilot study (Appendix G) conducted in the vicinity of Buildings 131/242.
	i	Executive Summary, Risk Assessment, First Paragraph	"A summary of the results of the Site wide human health risk assessment is presented."	Should other potential receptors be included in the assessment of risk for this site? It is not described in this RIFS how the site will be re-developed after site demolition nor the schedule for redevelopment. The interim status of the site may present new habitat for other species not considered in the risk assessment conducted.

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1.0 Introduction				
1.0	1-2	Introduction, Second Paragraph, Page 2	"…"Western Area Remedial Investigation/Feasibility Study" (Geosyntec, 2006a),…"	Although it is assumed the December 2007 draft RIFS document superseded the 2006 Western Area RIFS, explain what the March 2010 draft RIFS is superseding or responding to. Some discussion regarding the purpose of this draft should be provided.
2.0 Hydrogeologic Conditions				
2.1	3	Geology, Page 3	Description of TDY site geology.	The description of TDY site geology includes three distinct subsurface environments: 0-10 feet bgs, dredge fill material; 10-35 feet bgs, Bay mud material; and 35+ feet bgs, Bay Point Formation. Boring logs provided in Appendix B suggest that the upper 10 feet of the subsurface profile consist of a mix of clay, silt, and sand layers with the majority of the material comprised of silty sand and fine to coarse sand layers. Few of the Hydropunch boring logs included in Appendix B provide texture data for the Bay mud interval or the Bay Point Formation. The few borings (mostly MWCL1 – 8) that do cover these intervals indicate more sand than fine-grained material. The reported physical characteristics of the subsurface environment suggest that a greater potential for contaminant migration exists then is indicated

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				in later sections of this document and other recently submitted draft documents (March 2010 draft Risk Assessment Appendix A, March 2010 draft PCB Characterization Report, and March 2010 draft RIFS Appendix A). An evaluation of the potential impact of these sand layers on potential contaminant migration under the TDY site should be included in the evaluation of potentially applicable remediation options.
2.2	3-4	Local Hydrogeologic Conditions, First Paragraph, Page 3	"Groundwater at the Site occurs at approximately 6 to 8 feet bgs. Groundwater elevations fluctuate diurnally with tidal variations in the San Diego Bay."	With the presence of fine to medium and coarse sand layers, a groundwater table at 6-8 feet bgs, and a reported impact to groundwater elevations based on tidal cycles across the Site, the subsurface environment at the TDY site appears to exhibit markedly different physical properties than those reported in later sections. An evaluation of the potential impact of these sand layers and tidal fluxes on potential contaminant migration under the TDY site should be included in the evaluation of potentially applicable remediation options.

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2.2	3-4	Local Hydrogeologic Conditions, Third Paragraph, Page 4	Paragraph lists values for various soil parameters used in later sections of the document.	Soils data used to calculate effective porosity, saturated hydraulic conductivity for the site should be provided in a table with this document. The data should be clearly referenced to the original source data. This is important because the data reported in this section were used to support conclusions regarding the potential for various contaminants to migrate in the subsurface environment under the TDY site and the potential to impact off-site receptors (e.g. Convair Lagoon). Saturated conductivity values for silt, silty sand, medium sand, and coarse sand classes reported in the literature can be hundreds to thousands of times greater (e.g. 1E-3 to 1E-1 cm/sec) than the 1E-5 cm/sec value calculated from one boring and used for the TDY site. Review of boring logs provided in Appendix B suggest the routine presence of fine, medium, and coarse sand layers interspersed with layers of silty sand and clay. The logs suggest that a significantly higher saturated hydraulic conductivity (1E-3 to 1E-1 cm/sec) value may be just as appropriate as the 1E-5 cm/sec value. Some sort of evaluation of the range of

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				potential saturated hydraulic conductivities should be conducted, since the data was used to support some critical assumptions and conclusions about the Site and the potential for contaminants to migrate and impact off-site receptors (e.g. Convair Lagoon).
2.2	3-4	Local Hydrogeologic Conditions, Third Paragraph, Page 4	"Saturated hydraulic conductivity was determined to be in approximately 1 x 10^{-5} cm/sec, in a core sample of the shallow saturated zone, collected approximately 11 feet bgs by Geosyntec in March 2006."	The calculated hydraulic conductivity value should include more data than one core sample from one boring at 11 feet bgs. The upper 10 feet of the profile are from the placement of dredge materials and as such, significant variations in saturated conductivities should be expected. The existence of preferential pathways associated with sand lenses and backfill along SWCS and building foundations should also be expected. Review of logs in Appendix B show that very little recovery samples were recorded below the dredge fill layer. It is unknown if the non-recovery of core samples was due to the potential non-cohesive nature of the material at deeper depths or the lack of sampling. However, if the reason for no recovery of the sample was the non-cohesive nature of the material (i.e. saturated sand), then the reported saturated hydraulic conductivity calculated from the one boring location may be biased low (i.e. only the finer, more cohesive material containing lower saturated

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				hydraulic conductivity values was recovered, while the coarser material with higher saturated hydraulic conductivities was not). If slug tests have been conducted in monitoring wells or hydropunch borings located in the three distinct layers present under the TDY site, effective hydraulic conductivities could be calculated from the slug test data and compared to the one value reported.
2.2.1	4	Groundwater Flow Characterization, First Paragraph, First Sentence, Page 4	Figure 2-1	Recommend Figure 2-1 list only those monitoring wells used to calculate gradient and flow direction on August 21, 2007. Provide groundwater data used to calculate gradient and direction in a table or an Appendix.

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2.2.1	4	Groundwater Flow Characterization, First Paragraph, Page 4	"Groundwater elevation data were collected across the Site on August 21, 2007…"	The paragraph indicates that all groundwater data were collected within three hours of one tide cycle. However, the paragraph does not describe if the data was collected during an incoming, outgoing, flood, or ebb tide. Data collected during an outgoing tide could be significantly different than data collected during an incoming tide, particularly in regard to gradient and flow direction. Also, to better understand the impact(s) of tide cycles on the movement of contaminated groundwater under the TDY site, a long-term monitoring program using automated data collection devices in critical monitoring wells should have been conducted. Collection of data from one or two discrete tidal cycles does not represent the annual impacts to the movement of contaminated groundwater under the TDY site and prevents a complete understanding of the potential mechanisms involved in the migration of contaminants in groundwater and the smear zone. Assuming the data reported in Figure 2-6 represent the August 21, 2007 monitoring event, a slightly higher maximum gradient of 0.004 ft/ft was estimated.

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2.2.1	4	Groundwater Flow Characterization, Second Paragraph, Page 4	The paragraph describes measurements collected between high and low tides on July 27, 2005, and the reported fluctuations of groundwater elevations from 0 to 3.04 feet. Reportedly the maximum fluctuations in groundwater elevations occurred in monitoring wells closest to the Convair Lagoon and the 30" East SWCS.	The July 27, 2005 data reported in this paragraph should be provided in a table or a figure with this document. The data and a figure listing the wells the data were obtained from, is required to understand the extent of impacts from tidal cycles on the potential migration of contaminated groundwater under the TDY site. Based solely on statements in this paragraph and Figure 2-1, the most significant impacts (>1 foot) to groundwater elevations were detected in monitoring wells approximately 250-300 feet from the Convair Lagoon. It is unknown if these reported fluctuations in groundwater elevations are due simply to pressure waves caused by the incoming tide, the migration of backed up water in the dredge fill material, or backed up water in the 30" East SWCS with subsequent flow into and out of the pipe via cracks or holes, or the flow of backed up water in the SWCS backfill with subsequent flow into and out of the backfill material. Whatever the actual mechanism is, the data shows that tidal cycles can impact groundwater movement at significant distances from the Convair Lagoon and that transmissivity, velocity, and conductivity values may be significantly different than is

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				what currently described based on laboratory data. The reported effect may suggest that native backfill surrounding the 30" East SWCS and by reference, the other SWCS present under the TDY site are providing a preferential pathway for contaminated groundwater and storm water to the Convair Lagoon. The impacts from tide cycles on the TDY site should be given more consideration as to its potential impact on the migration of contaminants.
2.2.1	4	Groundwater Flow Characterization, Third Paragraph, Page 4	"One groundwater well (GT-4) indicates that groundwater may to be tidally influenced in the immediate vicinity of the 54-inch storm drain."	It appears GT-4, a monitoring well located approximately 750 feet from the Convair Lagoon, is impacted by tide cycles. It is unknown if the reported fluctuations in groundwater elevations are due to pressure waves caused by the tide cycles, the migration of backed up water in the dredge fill material, or backed up water in the 54" SWCS with subsequent flow into and out of the pipe via cracks or holes, or the flow of backed up water in the SWCS backfill with subsequent flow into and out of the backfill material. Whatever the actual mechanism is, the data show that tidal cycles can impact groundwater movement at significant distances from the Convair Lagoon and that transmissivity,

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				velocity, and conductivity values may be significantly different than is what currently described. This reported effect also suggests that the backfill surrounding the 54" SWCS and by reference, the other SWCS present under the TDY site may provide preferential pathways for the movement of contaminants in groundwater. The presence of this preferential pathway was acknowledged in the March 2010 draft Risk Assessment Appendix A, Section 3.2 [City of San Diego technical review comments submitted to the San Diego Water Board on April 5, 2010].

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2.2.1	4	Groundwater Flow Characterization, Third Paragraph, Page 4	The paragraph lists estimated values for groundwater velocity, hydraulic conductivity, effective porosity, and gradient for the TDY site that may not be representative of actual site conditions.	Based on previous comments for Sections 2.1, 2.2, and this subsection, the estimated values for the various groundwater parameters may not reflect actual subsurface conditions at the TDY site. At a minimum, median, average, or preferably, a range of groundwater parameter values should be provided in a table with this report for each of the three distinct layers described in Section 2.1, Geology with example calculations provided. Additional support for the conclusion that the groundwater parameters listed here may not represent subsurface conditions found in Figure 4-1, 1,4-Dioxane Sample Results and Appendix G, Building 131/242 Pilot Study Report, Section 4.1 and Figure 3. Figure 4-1 shows a partially delineated 1,4-dioxane plume approximately 550 to 600 feet in length to the southwest of Buildings 131/242. Assuming the discharge of 1,4-dioxane occurred between 30 to 60 years ago, the potential distance the 1,4-dioxane migrated on an annual basis may be in the range of 10 to 20 feet per year. The VOC and DNAPL plumes shown on Figure 3, Appendix G, appear to originate from a source area near B131-MW2 and

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				extend past B131-MW5, an approximate distance of at least 300 and 225 feet, respectively. The approximate widths of the VOC and DNAPL plumes appear to be 200 and 50 feet, respectively. Assuming the discharge occurred between 30 to 60 years ago, the potential distance VOCs and DNAPL migrated on annual basis may be in the range of five to ten feet per year for VOCs and four to eight feet per year for DNAPL. These rough estimates are for contaminants that possess higher retardation factors in soils than the more mobile contaminants, such as Cr+6. Based on the plume dimensions for 1,4-dioxane, VOCs, and DNAPL, the migration of these contaminants may be associated with preferential pathways (e.g. medium and coarse sand layers, natural backfill associated with SWCS, etc.).
3.0 Evaluation of Background Conditions and Identification of Areas of Concern				
3.0	5-9	Evaluation of Background Conditions and Identification of Areas of Concern, Second Paragraph, Page 5	No reference for Table 3-1 results.	Recommend listing the location of the data and calculations used to generate the background values listed in Table 3-1. Appendix F?

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3.1	5-9	Definition of Areas of Potential Concern, First Paragraph, Page 5	No Figure 1-3 provided.	It is unclear if the Figure 1-3 listed in this paragraph refers to a Figure 1-3 in the 2005 Site Characterization Report or a Figure 1-3 in this document. Figure 1-3 should be provided in this document showing the AOPCs under discussion in this section.
3.1	5-9	Definition of Areas of Potential Concern, First Paragraph, Page 5	Several AOPCs listed on pages 6-7 are not shown on any figure in this report.	Excluding Figure 1-3 which should be provided, the following AOPCs are not shown on any figure (e.g. Figure 1-2): AOPC Explosives Area, AOPC Test Cell #4/Area D, AOPC southeast of Building 146, AOPC South of Building 121, AOPC Building 166 Above Ground Solvent Tank, and AOPC Former Maintenance Yard.

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3.1	5-9	Definition of Areas of Potential Concern, Last Paragraph on Page 7	It is unclear what the point of the discussion is in this paragraph regarding the various SWCS currently discharging to the Convair Lagoon. It appears a rationale is being provided as to why the current SWCS are not AOPCs or AOCs based on some potential future actions at the TDY site (i.e. "…entail a nearly complete removal of the SWCS and laterals and replacement with a new system that will drain the Site.")	Both the March 2010 draft RIFS Appendix A and March 2010 draft Risk Assessment Appendix A documents describe the current SWCS as complete pathways for the discharge of PCBs to the Convair Lagoon [City of San Diego technical review comments for March 2010 draft Risk Assessment Appendix A document, March 2010 draft RIFS Appendix A document, March 2010 draft PCB Characterization Report submitted to the San Diego Water Board on April 5, 2010]. It appears premature to suggest that the current SWCS will not even be AOPCs based on some future actions at the TDY site and without the finalization of TDY cleanup criteria for groundwater, sediments, and soils. Current descriptions of the remediation of the TDY site indicate that laterals to the 60" SWCS will be removed and that various sections of the 30" East SWCS will be either removed or abandoned-in-place (assumed). The remaining SWCS, 54", 60", and possibly 30" West, will remain. Future re-development of the Site remains unknown. Therefore, some of these SWCS which are documented discharge points for PCBs and other contaminants are AOCs and could potentially remain AOCs or AOPCs for some time after site demolition has been completed.

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3.1	5-9	Definition of Areas of Potential Concern, First Paragraph on Page 8	Unclear what the term "…via the formation…" is referring to.	Is the term "formation" referring to the Bay Point Formation?
3.1	5-9	Definition of Areas of Potential Concern, First Paragraph on Page 8	Concerns with Appendix A to the Risk Assessment	The City of San Diego has numerous concerns with the conclusions reported in the March 2010 draft Risk Assessment Appendix A document. Refer to City of San Diego technical review comments for the March 2010 draft Risk Assessment Appendix A submitted to the San Diego Water Board on April 5, 2010. .
3.1	5-9	Definition of Areas of Potential Concern, Groundwater to San Diego Bay Migration Pathways, Page 8	Concerns with Appendix A to the Risk Assessment	See previous Section 3.1 review comments regarding this issue.
3.1	5-9	Definition of Areas of Potential Concerns, Soil/Sediment to San Diego Bay Migration Pathways, Pages 8-9	Concerns with Appendix A to the Risk Assessment	See previous Section 3.1 review comments regarding this issue.

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3.1	5-9	Definition of Areas of Potential Concern, Soil/Sediment to Construction/ Maintenance Worker Pathway, Page 9	Concerns with Appendix A to the Risk Assessment	See previous Section 3.1 review comments regarding this issue.
4.0 Remedial Investigation				
4.1.1	10-11	AOPC Building 158 Investigation, Delineation of Impacts	Concern that vertical and horizontal delineation has not been completed for this AOPC.	Review of Figure 2-2, Hydrogeologic Cross-Section A-A' Building 156 (probably mean Building 158) suggests that vertical delineation has not been completed. Since no samples were collected between 11 and 35 feet bgs and the existence of preferential pathways associated with the coarser sand layers is possible, there is some question whether Cr+6 impacts have been sufficiently delineated. Existing aboveground structures probably also prevent complete lateral delineation of potential Cr+6 impacts at this location.

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4.1.1	10-11	AOPC Building 158 Investigation, Delineation of Impacts, Last Paragraph, Page 11	Concern with the statement "These results indicate chromium impacts are limited to shallow groundwater in the southern portion of Building 158 (Figure 2-2).", based on a decrease in hexavalent chromium concentrations over 20 feet.	Because there was no collection and analysis of solid samples between the depths of 11 and 35 feet bgs, there is some question whether vertical delineation of Cr+6 impacts has been completed. The existence of preferential pathways is possible based on Appendix B borings and the migration of Cr+6 will be impacted by variations in permeability. This sentence is not currently supported by the data reported in this document.
4.1.2.3	12-13	AOPC Building 158 Investigation, Bench Study Results and Discussion, Pages 12-13	Discussion of results.	Results of the bench scale study indicate $FeSO_4$ and ZVI may provide suitable options for in situ treatment of Cr+6. However, until a pilot scale in situ test is conducted, it is unknown what difficulties will be encountered in applying this technology as a final remedial option at this location, and other TDY Cr+6 impacted locations.
4.2.2	14	AOPC Building 131/242 Investigation, Horizontal Extent of 1,4-Dioxane, Page 14	"The extent of 1,4-Dioxane has been sufficiently defined to perform the risk assessment and feasibility study."	Based on the discussion of 1,4-dioxane sampling results reported in Table 3-3 (probably mean Table 4-3), it appears the lateral extent of the plume may have been mostly delineated. However, Figure 4-1 suggests the boundary for the southwest quadrant of the plume has not been confirmed. Some discussion should be provided as to the uncertainty for this area.

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4.3.1	17	Pilot Study Groundwater Monitoring Results, First Paragraph	B131-MW6 not shown.	For completeness, Figure 2-1 should include the location of B131-MW6.
4.3.1.2	18-19	Downgradient Results, First Paragraph, Page 18	No Figure 3	No Figure 3 provided in this document. B131-MW6 not listed on Figure 2-3.
4.3.1.2	18-19	Downgradient Results, Second and Third Paragraphs, Page 19	Second paragraph: "…potentially ultimately achieving background concentrations in groundwater." And Third paragraph: "…ultimately reaching background conditions without …"	Recommend text be added supporting these statements and describing what constitutes background chlorinated VOC concentrations, or remove statement.

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4.4	19-20	AOPC Building 120, Investigation, First Paragraph, Page 20	The conclusion that "The downgradient extent of impacts is defined by B120 MW-4 and -5 which show VOC concentrations to trace concentrations (Table 4-5).", is questionable based on review of Figure 2-4 and Table 4-4.	Review of figure 2-4 and Table 4-5 (probably mean Table 4-4) indicate the downgradient extent of the VOC plume toward the Convair Lagoon has not been completely delineated. The data suggest that the absence of chlorinated VOCs in B120-MW4, 60 feet downgradient of the T-50 boring, which reported very elevated concentrations of chlorinated VOCs, may mean the VOC plume has migrated in a horizontal or vertical direction that has not yet been identified. Review of Figure 2-1 appears to indicate minimal soil or groundwater data have been collected in a southeast direction (e.g. east of B120 MW4 and downgradient of B120 MW6). The shallow depth of the B120-MW4 groundwater sample and the absence of soils data between 11-35 feet bgs may indicate the main part of the plume was missed. The likely existence of preferential pathways due to the presence of the 30" East SWCS and other structures, such as the North Harbor Drive may be creating a different subsurface environment than what is expected based on current monitoring wells and borings.

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4.5	20-21	Convair Lagoon Vicinity	The reporting and interpretation of groundwater data from monitoring wells, MWCL1 through MWCL 8, particularly for PCBs, metals and some of the chlorinated VOCs, is based mainly on a very small dataset with QA/QC issues spanning 24 months.	The City of San Diego has significant concerns with the conclusions reported in this subsection. Review of City of San Diego technical review comments for the March 2010 draft Risk Assessment Appendix A document, March 2010 draft RIFS Appendix A document, and the March 2010 draft PCB Characterization Report submitted to the San Diego Water Board on April 5, 2010 is recommended.
5.0 Risk-Based Concentrations and Area of Potential Concern Evaluation				
5.0	22-36	Risk-Based Concentrations and Area of Potential Concern Evaluation	General Comment on the risk assessment process described in this section.	This section of the draft document calculates risk-based screening levels for specific areas of the TDY site using the results from a past Site-wide risk assessment. It appears based on the description of the process applied, that re-calculation of risk-based screening levels for portions of the Site are incomplete. The lack of information and the use of "non-typical" presentations of the methodology prevent re-calculation of the results reported in this section in a reasonable amount of time. Typical base guidance documents, such as the EPA Soil Screening Guidance and the DTSC corollary, routinely applied to such an exercise are not referenced in this draft document and it is unclear if these documents were used in the conduct of this effort.

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5.1	22-23	Summary of Risk Assessment, First Paragraph, Page 22	"Based on the historical and planned uses of the Site, it is presumed that the entire Site will be redeveloped for future commercial/light industrial uses."	Planned re-development of the TDY site and the timing of such redevelopment have not been described in this document. The assumptions about future Site uses may not be accurate. Therefore, an ecological risk assessment is needed to address potential risks to receptors that may eventually reside on-site prior to any redevelopment. Discussion should be included about site re-development and its timing and the need to conduct an ecological risk assessment.
5.1	22-23	Summary of Risk Assessment, Second Paragraph, Page 22	The sentence "Current data from wells installed in the vicinity of Convair Lagoon indicate that on-Site groundwater impacts do not impact San Diego Bay (Section 4.4)."	The sentence concludes that groundwater does not impact the Bay based on information discussed in Section 4.4. This conclusion allows the risk assessment to limit the pathway and subsequent evaluations. Also the Section 4.4 in this document does not address this particular issue. Are the authors referring to a Section 4.4 in some other document? The correct reference should be provided. The City of San Diego has significant concerns with the data quality, the transport modeling conducted, and the conclusions reported in the March 2010 draft Risk Assessment Appendix A document.

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				Review of City of San Diego technical review comments for the March 2010 draft Risk Assessment Appendix A document, the March 2010 draft PCB Characterization Report, and the March 2010 draft RIFS Appendix A document submitted to the San Diego Water Board on April 5, 2010 is recommended.
5.1	22-23	Summary of Risk Assessment, Third Paragraph, Second Bullet, Exposure Assessment, Page 22	"The exposure scenarios are summarized in a Conceptual Site Model (CSM)..."	Although discussed here, no CSM or discussion was found during the review of this document.
5.1	22-23	Summary of Risk Assessment, Third Paragraph, Fifth Bullet, Uncertainty Analysis, Page 23	"A discussion of the uncertainties…"	No uncertainty analysis was found during the review of this report. Where this and other requisite sections are not included, they should be provided. We do note that this is a subsequent risk analyses on specific areas, however, these requisite sections should be included, and any difference between the areas evaluated be noted and discussed.

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5.1.1	23-24	Exposure Scenarios, Table, Trench Worker, Page 24	Description of trench worker exposure scenarios.	The Construction worker and trench worker appear to be exposed to the same media via the same pathway. While the frequency or rate of exposure may be slightly different, are both of these receptors necessary?
5.1.1	23-24	Exposure Scenarios, Table, Industrial/Commercial Worker, Page 24	Description of industrial/commercial worker exposure scenarios.	Since a "current" Industrial/Commercial Worker" is noted above, should this be a "future?" Also, the text should explain why a current Worker (first in the list) is not exposed to shallow soil, but this one is.
5.1.2	25	Compounds of Potential Concern, First Paragraph, Page 25	"USEPA guidance (USEPA 1997)…"	The reference here is likely incorrect. We believe it is referring to the exposure factors handbook which does not provide guidance on screening or identifying Chemicals of Potential Concern. Appropriate References should be: (1) EPA, 1989. Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual (Part A), EPA/540/1-89/002; (2) Cal EPA, DTSC, 1997. Selecting Inorganic Chemicals of Potential Concern at Risk Assessments at Hazardous Waste Sites and Permitted Facilities; (3) Ca EPA, DTSC. 1994. Preliminary Endangerment Assessment Guidance Manual (See Section 2).

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5.1.2	25	Compounds of Potential Concern, Second Paragraph, Page 25	"…for these same metals in California and western soils."	This methodology is not in the referenced guidance, nor typically accepted. Inorganics occur at various concentrations depending on the geological parent material of the soils. A determination of the maximum background soil concentration throughout the west may not provide an upper bound estimate of a specific site and thus, may not allow for a proper determination of whether an inorganic chemical has been elevated above its naturally occurring levels at a specific site. How was this comparison used in the assessment?
5.1.3	25-26	Site Conceptual Model, First Paragraph, Pages 26	"For all metals and SVOCs…"	This is a broad statement and may not be accurate for all forms of metals. Is it required?
5.1.3	25-26	Site Conceptual Model, First Paragraph, Pages 25-26	1. No figure presenting the general site conceptual model discussed in this subsection is provided in this document. 2. "An evaluation of potential exposure routes to off-site receptors is presented in the Risk Assessment Appendix A."	1. A figure presenting the general site conceptual model should be provided. 2. The City of San Diego has numerous concerns with the conclusions reported in the March 2010 draft Risk Assessment Appendix A document. Refer to City of San Diego technical review comments for the March 2010 draft Risk Assessment Appendix A document submitted to the San Diego Water Board on April 5, 2010. .

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5.2	26	Remedial Action Objectives, Page 26	Description of Remedial Action Objectives	Remedial Action Objectives (RAOs) are typically discussed after the risk assessment as part of the feasibility study. The risk characterization is completed first so the RAOs can be targeted for the known risks. While the broad RAOs noted in this section are not incorrect, without a risk characterization section, the need and more specific applicability of these RAOs at this point in the document are unknown.
5.2.2	27	RBCs for the Indoor Air Pathway, Third Sentence, Page 27	"The computer spreadsheet model…"	This section should be discussing the use of a model and its applicability with reference to DTSC acceptance, not the fact that the software is free.
5.2.3	27-30	RBCs for the Direct Contact and Outdoor Air Pathway, $CR_{Ingestion}$ Equation, Page 28	$CR_{Ingestion}$ Equation applied appropriately?	The exposure variables of body weight, dermal contact, and ingestion rate vary by age. Since the introduction of Soil Screening Guidance by EPA in 1996, most calculations of risk have utilized age-adjusted factors. This document does not discuss this and it is unclear if these were used.

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5.2.3	27-30	RBCs for the Direct Contact and Outdoor Air Pathway, Equation, Page 28	Ingestion rate for soil applied appropriately?	While this document provides the equation, it does not identify or provide a discussion of the values used for many of the variables. This makes it difficult to reproduce the final results.
5.2.3	27-30	RBCs for the Direct Contact and Outdoor Air Pathway, $RBC_{Carcinogen}$ Equation, Page 29	$RBC_{Carcinogen}$ Equation applied appropriately?	No calculation is provided for evaluating the migration of COPCs to groundwater and determining subsequent risks. This is typically performed and is a requisite requirement for identifying cleanup levels in soils.
5.2.3	27-30	RBCs for the Direct Contact and Outdoor Air Pathway, $RBC_{Noncarcinogen}$ Equation, Page 29	$RBC_{Noncarcinogen}$ Equation applied appropriately?	In 1993, EPA Region 3 began publishing Risk-Based screening concentrations by solving the standard risk-based equations for the soil concentration variable and setting the risk at 10^{-6} and 1 for carcinogenic and non-carcinogenic effects. In 1996, EPA published the Soil Screening Guidance. These documents established a set of equations that are used to solve for soil concentrations which are protective of human health via ingestion, dermal, and inhalation pathways, as well as protective of groundwater. While the verbiage varies slightly among states, some form of these equations and approach are used in the vast majority of guidance and risk assessments conducted throughout the country.

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				Although mathematically there will be minimal differences in the cleanup goals, applying standardized equations and methods in this section will allow for greater consistency, understanding, and transparency in the calculations.
5.2.3	27-30	RBCs for the Direct Contact and Outdoor Air Pathway, Last Paragraph, Page 30	"…the cumulative Site risk would be within the USEPA acceptable risk range of 10^{-6} to 10^{-4}."	This is not truly an "acceptable range" to EPA. As written it is misleading. EPA considers cancer risk below 10^{-6} to be *de minimus*, or of minimal concern. EPA considers levels above 10^{-4} to be *de maixmus*, or at levels of significant concern and thus requiring action. Cancer risks between these levels are considered on a site specific basis based in part on the level of uncertainty in the characterization.
5.3	30-31	Post-Remediation Evaluation of Risk, Second Paragraph, Third Sentence, Page 30	"…(dimensions of a typical commercial building…"	Is there a reference for this statement?

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5.3	30-31	Post-Remediation Evaluation of Risk, Sixth Paragraph, Second Sentence, Page 31	"An area of 25,000 square feet, placed and centered…"	Rather than prescriptively stating the area will be centered, consider noting that adjacent concentrations will be geospatially evaluated for trends and the "exposure area" will be positioned to reflect those trends.
5.4.1	32-33	AOC Building 131/242		No Figure 4-2 provided.
5.4.3	33-34	AOC Building 158, First Paragraph and Third Bullet, Page 33	1. "One location in Building 158, (0158-GW-16) has additionally contained elevated VOC concentrations related to a sheen of TPH described as LNWPL." 2. "Chromium impacts are isolated to a relatively small area within the footprint of Building 158."	1. It is unknown if the two groundwater samples from well, 0158-MW-16 (LNAPL) and boring T-49 (no LNAPL) came from the same approximate depth and represent similar subsurface conditions. Some discussion regarding this issue should be included. 2. Discussion of this AOC in Section 7.2.2 suggests there is uncertainty in subsurface Cr+6 impacts at this location. The two statements should be consistent with each other.
5.4.6,	34	AOC Building 166 AST/120/121	Location of Building 166 AST.	The location of Building 166 AST should be provided on any figure used to discuss this location.
5.4.7	34-35	AOC Former Maintenance Yard	Location of AOC Former Maintenance Yard.	The location of AOC Former Maintenance Yard should be provided on any figure used to discuss this location.

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5.4.9	35	AOPC Explosives Area	Location of AOPC Explosives Area.	The location of AOPC Explosives Area should be provided on any figure used to discuss this location.
5.4.10	35	AOPC Test Cell #4/ Area D	Location of AOPC Test Cell #4/ Area D.	The location of AOPC Test Cell #4/ Area D should be provided on any figure used to discuss this location.
5.4.16	36	AOPC Storm Water Conveyance System	"An evaluation of the feasibility of remedial alternatives, based on the results of the Risk Assessment is presented in Appendix A."	The City of San Diego has numerous concerns with the data quality, the transport modeling conducted, and the conclusions reported in the March 2010 draft Risk Assessment Appendix A document and the March 2010 draft RIFS Appendix A document. Refer to City of San Diego technical review comments for the March 2010 draft Risk Assessment Appendix A document and the March 2010 draft RIFS Appendix A document submitted to the San Diego Water Board on April 5, 2010 is recommended.

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6.0 Feasibility Study				
6.0	37	Feasibility Study, First Paragraph Page 37	A recommended remedial alternative is presented for each AOPC based on the findings of the feasibility study in accordance with…"	It may be premature to recommend one remedial option over another without confirming after site demolition, that impacts to subsurface soils and groundwater correlate with the current understanding of the subsurface environment. Finalization of site cleanup criteria and a clear understanding of the timing and actual redevelopment of the TDY site could also significantly impact the application of any recommended remedial option. The feasibility analysis described in Section 6.0, assumes the proposed RBCs are the final cleanup criteria for the TDY site and that impacts to subsurface soils and groundwater will not change once all aboveground obstructions have been removed. The ability of a recommended remedial option to achieve more restrictive cleanup and the costs associated with applying a recommended remedial option in the event additional contaminants or a significant increase in contaminated media are detected have not been described. Although Sections 5.4 and 7.2.2 acknowledge the uncertainty in the current understanding of Cr+6 impacts to subsurface soils and

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				groundwater, that uncertainty does not appear to have been considered in the recommendation of potentially applicable remedial options. Ultimately, the remediation goal for the TDY site is to insure that the residual contaminants present subsurface soils and groundwater will not adversely impact off-site receptors (e.g. Convair Lagoon) via surface water, storm water, or groundwater pathways.
6.1	37	Screening Analysis, Page 37	"The screening analysis was conducted to reduce the number of potentially applicable alternatives…"	Although the eliminated remedial technologies are identified in Section 6.3.1, the actual screening process is not described and it is unclear if the remedial approaches eliminated are not as potentially applicable as the retained approaches, particularly with the current uncertainties in cleanup criteria, amount of impacted soils and groundwater and future use of the site.

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6.2	38-39	Detailed Feasibility Analysis, Page 38	Subjective nature of the feasibility analysis	Realizing the basic evaluation criteria (effectiveness, implementability, overall protection of human health, and cost) used to conduct a feasibility analysis are by nature subjective; at some point, a certain amount of quantification needs to be applied to those subjective criteria so that it is transparent how a particular remedial option is selected over another remedial option. As currently presented, it appears no consideration has been given to the potential impacts on the recommended remedial option from more restrictive final cleanup criteria, increased amounts of contaminated soils or volumes of impacted groundwater to be remediated, and potential future uses of the site. It may be more appropriate in this document to identify potentially applicable remedial options which will be evaluated more critically at some future date after the uncertainties have been better quantified.
6.3.1	39-40	Eliminated Technologies, Pages 39-40	Brief summaries provided for eliminated technologies.	Recommend providing the criteria applied during the screening analysis. Currently, only a brief summary is provided to document elimination of potentially applicable remedial option. One potential remedial option apparently not considered is in situ application of calcium polysulfide to treat shallow Cr+6 impacts.

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6.3.2	40-46	Retained Technologies	Subjective evaluation of the retained technologies	An attempt should be made to reduce the subjective nature of the remedial technology evaluation by better defining (quantifying) the initial evaluation criteria (e.g. high, moderate, low, etc.) applied to retain or eliminate remedial options.
6.4	46-122	Remedial Alternatives by AOC/AOPC, First and Second Paragraphs, Page 46	"The remedial alternatives retained from the screening analysis were subjected to the detailed analysis criteria." "The technologies which are identified as technically feasible for each AOC are subsequently evaluated on a basis of economic feasibility…"	The recommended remedial options identified for the fifteen AOCs and AOPCs described in this section do not appear to consider what the impacts of current uncertainties related to cleanup criteria, ultimate areas of soils and volumes of groundwater requiring remediation, and future uses of the Site may have on the implementability, effectiveness, protection of human health and other potential receptors, and ultimately, the cost of any recommended remedial option. It may be premature to recommend any one remedial option over another potentially applicable remedial option until site demolition has been completed, cleanup criteria have been finalized, and the timing and future re-development plans are better understood. Currently, the costs presented are qualitative and are based on the current understanding of the subsurface environment with aboveground obstructions present and the application of proposed RBCs. Whether the costs are realistic is currently unknown.

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6.4.1	46-122	Remedial Alternatives by AOC/AOPC, AOC Building 131/242, Page 46	Recommendation of Enhanced In Situ Bioremediation (EISB) for Building 131/242 and other AOCs and AOPCs.	Based on the results of a laboratory EISB pilot study, numerous statements are made about the ability of this technology to remediate various sites within two years. Applying the results of a pilot study where the soil materials tested were homogenized and environmental conditions were optimized does not equate with the application of the same technology to in-place subsurface soils. If the timeframe of two years was one of the criteria used to recommend this remedial option, it should be re-evaluated assuming a significantly longer timeframe to achieve assigned cleanup criteria to insure it remains the recommended remedial option.
6.4.1	46-54	AOC Building 131/242, Fifth Paragraph on Page 53	"A detailed evaluation…in Appendix A of the Site-Wide Risk Assessment (Geosyntec, 2007)."	The City of San Diego has numerous concerns with the data quality, the transport modeling conducted, and the conclusions reported in the March 2010 draft Risk Assessment Appendix A document. Refer to City of San Diego technical review comments for the March 2010 draft Risk Assessment Appendix A document submitted to the San Diego Water Board on April 5, 2010.

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6.4.1	46-54	AOC Building 131/242, Sixth Paragraph on Page 53	"Due to extremely low hydraulic gradient, groundwater velocities in the Building 131/242 area are estimated to be less than 0.5 feet per year…"	This statement appears to be contradicted by the dimensions of the VOC and 1,4-dioxane plumes at this location (Appendix G, Section 4.1 and Figure 3). Estimates of annual migration of VOCs and 1,4 dioxane in this area are on the order of five to 20 feet per year. Also, monitoring wells and hydropunch borings (Appendix B) in the vicinity of this area clearly indicate the common presence of fine, medium, and coarse sand lenses, which most likely present saturated hydraulic conductivities 100s to 1000s of times greater than the value reported for one boring sample in Section 2.2. Finally, logs for all monitoring wells, hydropunch borings, and any other borings used in this document to describe subsurface impacts and support various conclusions regarding the potential migration of contaminants from the TDY site to off-site receptors need to be provided in Appendix B. The boring logs suggest that a potentially different subsurface environment may be present than is currently described in various sections of this report.

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6.4.2	54-60	AOC Building 156, Page 54	This AOC is impacted with PCBs and PCE…"	Does this AOC include metals impacts? Alternative 3 evaluates remediation of metals.
6.4.2	54-60	AOC Building 156, Third Paragraph on Page 59	"A detailed evaluation…in Appendix A of the Site-Wide Risk Assessment (Geosyntec, 2007)."	See Section 6.4.1 review comments regarding this issue.
6.4.2	54-60	AOC Building 156, Fourth Paragraph on Page 59	"Due to extremely low hydraulic gradient, groundwater velocities in the Building 156 area are estimated to be less than 0.5 feet per year.."	See Section 6.4.1 review comments regarding this issue.
6.4.3	60-69	AOC Building 158, Cost, Page 64	"…at approximately $19,000."	Appears estimated cost is missing some numbers.
6.4.3	60-69	AOC Building 158, Second Paragraph on Page 68	"…extent of CrVI impacts significantly increases…"	The statement acknowledges existing uncertainty in regard to the current understanding of subsurface Cr+6 impacts and its potential impact(s) on the application of a recommended remedial option. Consideration of this uncertainty on all recommendations should be included in Section 6 discussions.
6.4.3	60-69	AOC Building 158, Fourth Paragraph on Page 68	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.

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6.4.3	60-69	AOC Building 158, Fifth Paragraph on Page 68	"Due to extremely low hydraulic gradient, groundwater velocities in the Building 158 area are estimated to be less than 0.5 feet per year…"	See Section 6.4.1 review comments regarding this issue.
6.4.4	69-74	AOC Building 102, Fourth paragraph on Page 73	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.
6.4.4	69-74	AOC Building 102, Fifth Paragraph on Page 73	"Due to extremely low hydraulic gradient, groundwater velocities in the Building 102 area are estimated to be less than 0.5 feet per year…"	See Section 6.4.1 review comments regarding this issue.
6.4.5	74-78	AOC Building 120 South, First Paragraph on Page 78	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.
6.4.5	74-78	AOC Building 120 South, Second Paragraph on Page 78	"Due to extremely low hydraulic gradient, groundwater velocities in the Building 120 area are estimated to be less than 0.5 feet per year…"	See Section 6.4.1 review comments regarding this issue.

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6.4.6	78-87	AOC Building 166 AST/120/121, Overall Protection of Human Health, Second Paragraph, Page 81	"PCB groundwater impacts are unlikely…"	The City of San Diego has numerous concerns with the data quality, the transport modeling conducted, and the conclusions reported in the March 2010 draft Risk Assessment Appendix A document and the March 2010 draft RIFS Appendix A document. Refer to City of San Diego technical review comments for the March 2010 draft Risk Assessment Appendix A document, the March 2010 draft PCB Characterization Report, and the March 2010 draft RIFS Appendix A document submitted to the San Diego Water Board on April 5, 2010.
6.4.6	78-87	AOC Building 166 AST/120/121, Recommended Remedial Option, Sixth Paragraph on Page 86	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.
6.4.6	78-87	AOC Building 166 AST/120/121, Recommended Remedial Option, Seventh Paragraph on Pages 86-87	"Due to extremely low hydraulic gradient, groundwater velocities in the Building 120 area are estimated to be less than 0.5 feet per year…"	See Section 6.4.1 review comments regarding this issue.

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6.4.7	87-95	AOC Former Maintenance Yard, Recommended Remedial Option, Fifth Paragraph on Page 94	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.
6.4.7	87-95	AOC Former Maintenance Yard, Recommended Remedial Option, Sixth Paragraph on Page 94	"Due to extremely low hydraulic gradient across this AOC, groundwater velocities in the AOC Former Maintenance Yard are estimated to be less than 0.5 feet per year…"	See Section 6.4.1 review comments regarding this issue.
6.4.8	95-101	AOC Building 180, Recommended Remedial option, Third Paragraph on Page 100	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.
6.4.8	95-101	AOC Building 180, Recommended Remedial option, Fourth Paragraph on Page 100	"Due to extremely low groundwater flow gradient across this AOC, groundwater velocities in the Building 180 area are estimated to be less than 0.5 feet per year…"	See Section 6.4.1 review comments regarding this issue.
6.4.9	101-103	AOPC Explosives Area	Area not shown on any figure.	Show location of this AOPC on a figure.

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6.4.9	101-103	AOPC Explosives Area, Recommended Remedial option, Third Paragraph on Page 103	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.
6.4.9	101-103	AOPC Explosives Area, Recommended Remedial option, Fourth Paragraph on Page 103	"Due to the extremely low hydraulic gradient, groundwater velocities in the Explosives Area are estimated to be less than 0.5 feet per year."	See Section 6.4.1 review comments regarding this issue.
6.4.10	104-108	AOPC Test Cell #4/Area D	Area not shown on any figure.	Show location of this AOPC on a figure.
6.4.10	104-108	AOPC Test Cell #4/Area D, Recommended Remedial option, Second Paragraph on Page 108	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.
6.4.10	104-108	AOPC Test Cell #4/Area D, Recommended Remedial option, Third Paragraph on Page 108	"Due to the extremely low hydraulic gradient, groundwater velocities in the Area D/Test Cell 4 AOPC are estimated to be less than 0.5 feet per year."	See Section 6.4.1 review comments regarding this issue.

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6.4.11	108-111	AOPC Building 142, Recommended Remedial Option, Fifth Paragraph, Pages 110-111	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.
6.4.11	108-111	AOPC Building 142, Recommended Remedial Option, First Paragraph on Page 111	"Due to extremely low hydraulic gradient, groundwater velocities in the Building 142 area are estimated to be less than 0.5 feet per year…"	See Section 6.4.1 review comments regarding this issue.
6.4.12	111-114	AOPC Southeast of Building 146, Recommended Remedial Option, Fifth Paragraph, Pages 113-114	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.
6.4.12	111-114	AOPC Southeast of Building 146, Recommended Remedial Option, First Paragraph on Page 114	"Due to extremely low hydraulic gradient, groundwater velocities in the Building 146 area are estimated to be less than 0.5 feet per year…"	See Section 6.4.1 review comments regarding this issue.
6.4.13	114-117	AOPC Building 120 West, Recommended Remedial Option, Fifth Paragraph, Page 116	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.

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6.4.13	114-117	AOPC Building 120 West, Recommended Remedial Option, Sixth Paragraph, Pages 116-117	"Due to extremely low hydraulic gradient, groundwater velocities in the Building 120 West AOPC are estimated to be less than 0.5 feet per year."	See Section 6.4.1 review comments regarding this issue..
6.4.14	117-119	AOPC Building 222/228, Recommended Remedial Option, Third Paragraph on Page 119	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.
6.4.14	117-119	AOPC Building 222/228, Recommended Remedial Option, Fourth Paragraph on Page 119	"Due to the extremely low hydraulic gradient, groundwater velocities in the Building 222/228 Area are estimated to be less than 0.5 feet per year."	See Section 6.4.1 review comments regarding this issue.
6.4.15	119-122	AOPC South of Building 121, Recommended Remedial Option, Second Paragraph on Page 122	"…is presented in Appendix A of the Site-Wide Risk Assessment…"	See Section 6.4.1 review comments regarding this issue.
6.4.15	119-122	AOPC South of Building 121, Recommended Remedial Option, Third Paragraph on Page 122	"Due to the extremely low hydraulic gradient, groundwater velocities in the South of Building 121 AOPC are estimated to be less than 0.5 feet per year."	See Section 6.4.1 review comments regarding this issue.

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7.0 Conceptual Remedial action Plan				
7.0	123-134	Conceptual Remedial Action Plan, First Paragraph on Page 123	"Descriptions of the conceptual design of the recommended alternatives are provided…". "These conceptual designs form the basis of the cost-comparisons within this report, but do not represent final engineered design recommendations."	It would appear that recommending one remedial option over another is premature without finalization of cleanup criteria, removal of all aboveground obstructions, and confirmation of soil and groundwater impacts in the subsurface environment. Identification of potentially applicable remedial options and the development of costs based on a range of possible events are recommended at this point. As stated in subsection 7.2.2 AOC Building 158, the lack of certainty in the extent of Cr+6 impacts may result in the application of a different remedial option than is what currently anticipated. This approach should be applied to all AOCs and AOPCs rather than identifying one remedial option where the cost impacts are not clearly understood, the contamination may not be fully delineated, and the ability to achieve potentially more restrictive RCBs/cleanup criteria is unlikely or cost prohibitive. In the event more restrictive cleanup criteria are applied to the TDY site and the recommended remedial option fails to achieve the mandated cleanup criteria, then off-site receptors (e.g. the Convair Lagoon) may potentially remain at risk.

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7.1	123-129	Pilot Study/ Fast Track Remedial Actions, Page 123	"..a pilot study is proposed for EISB remedy in the 131/242 AOC."	Text should read "…a pilot study was conducted…"
7.2.2	130-133	Full Scale Remedial Actions, AOC Building 158, Pages 130-131	Discussion acknowledges there is uncertainty in the delineation of Cr+6 impacts under Building 158.	This issue should be considered for all AOCs and AOPCs that may require mitigation, so alternative approaches can be developed to address variance in the amount of contaminated media, types of contaminants, and cleanup criteria.
7.2.3	132-133	Full Scale Remedial Actions, AOC Former Maintenance Yard	Not listed on Figures 6-1, 6-2, or 6-3.	Provide location of AOC Former Maintenance Yard on identified figures.
7.2.5	134	Full Scale Remedial Actions, AOPC Explosives Area	Classified as No Further Action under currently proposed RBCs.	Not shown on Figures 6-1, 6-2, or 6-3. Is No Further Action still appropriate if more restrictive RBCs/ cleanup criteria for PCBs are applied?
7.2.9	134	Full Scale Remedial Actions, AOPC Building 120 West	Classified as No Further Action under currently proposed RBCs.	Not shown on Figures 6-1, 6-2, or 6-3. Is No Further Action still appropriate if more restrictive RBCs/ cleanup criteria for PCBs are applied?
7.2.10	134	Full Scale Remedial Actions, AOPC Building 222/228	Classified as No Further Action under currently proposed RBCs for PCBs and metals.	Is No Further Action still appropriate if more restrictive RBCs/ cleanup criteria for PCBs and metals are applied?

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7.2.11	134	Full Scale Remedial Actions, AOPC South of Building 121	Classified as No Further Action under currently proposed RBC for PCBs.	Not shown on Figures 6-1, 6-2, or 6-3. Is No Further Action still appropriate if more restrictive RBCs/ cleanup criteria for PCBs are applied?
Tables		Tables 6-1 through 6-15	Estimated remediation costs for each AOC or AOPC requiring mitigation.	Because of the uncertainty in how costs for each recommended remedial option were developed and whether they capture the potential range of variables present during the remediation of a contaminated site, a range of cost estimates for each remedial option should be provided. Once site demolition has been completed, cleanup criteria have been finalized, impacts to subsurface soils and groundwater have been confirmed, and the timing and re-development of the site quantified, costs for the recommended remedial option can be better quantified.

City of San Diego Comments on Remedial Investigation/Feasibility Study 2701 North harbor Drive, San Diego, CA May 3, 2010				
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Figures			Identification of Buildings, AOCs, and AOPCs in Figures	All borings and monitoring wells listed in Figure 2-1 and other figures in this document should be provided in Appendix B. Building numbers should be provided on Figure 3-1, 3-2, 5-1, 5-2, 5-3. There are a number of AOPCs (e.g. Former Maintenance Yard, Explosives Area, etc.) that are not listed on any Figure. The missing AOPCs should be clearly listed on figures along with Building numbers. Some buildings and their numbers (e.g. 222/228) appear on some figures and not on others.
Appendix A		Feasibility Study of Remedial Alternatives for Off-Site Impacts		Refer to City of San Diego technical review comments for the March 2010 draft RIFS Appendix A document submitted to the San Diego Water on April 5, 2010. .
Appendix B		Boring Logs, Monitor Well Construction Diagrams, and Groundwater Sample Collection Logs		Completion logs for all monitoring wells, hydropunch borings, and any other borings shown on figures included in this document or discussed in text or data tables need to be included in this appendix.