

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

11 JACKSON STREET, ROOM 6040

OAKLAND 94607

Phone: Area Code 415
464-1255

August 25, 1982

File No. 2189.8009(SRR)tmh

Department of the Navy
Naval Air Station
Public Works Officer (Bldg. 566)
Moffett Field, CA 94035

Dear Sir:

Pursuant to the meeting between Steve Ritchie and Adam Olivieri of our office and Lt. Comdr. Scott, Paul Prater, and Ralph Helmers on July 28, 1982 and Mr. Ritchie's subsequent telephone conversations with Maxwell Yao and Jerry Arnold, we hereby request that you complete the attached Mandatory Facility Questionnaire. Please submit it to this office in accord with the following time schedule:

Complete information on existing solvent storage tanks/sumps - September 3, 1982

Complete information on abandoned solvent storage tanks/sumps - September 17, 1982

Complete information on all other storage tanks/sumps as indicated on the questionnaire - October 15, 1982

This information must be submitted in this timely fashion because of the contaminated ground water discovered on your property by investigators for Fairchild Camera & Instrument Company. It is imperative that all of the sources of this material be identified so that appropriate clean up measures can be initiated.

Verbal information we have received so far indicates that you have two 2500 gallon non-vaulted waste solvent tanks without corrosion protection which were placed in operation prior to January 1, 1975. You will definitely be required to implement a subsurface investigation to determine if these units were or are leaking. In order to make this determination, you may use the "General Guidelines for Subsurface Investigation" which is attached to the Questionnaire or you may submit in writing an alternative investigation program. Your program must be approved by me prior to its implementation,

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RWQCB/NAVY-1

August 25, 1982

You should start preparing for this investigation now. We expect you to be prepared to begin a subsurface investigation approved by me relative to waste solvents no later than October 1, 1982 with results of this investigation submitted to us no later than October 29, 1982.

For your information a list of the EPA 129 priority pollutants is attached. Generally, the halogenated aliphatics and the monocyclic aromatics fall in the solvent category. Other solvents which are not on this list include trichloroethylene, methyl ethyl ketone, and xylene. There are many others.

If you have any questions regarding this, please contact Steve Ritchie at (415) 464-4269.

Sincerely,



FRED H. DIERKER
Executive Officer

Enclosures

cc: Western Naval Engineering Command
Attn: Maxwell C. Yao Code 1142

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MANDATORY FACILITY QUESTIONNAIRE

The California Regional Water Quality Control Board, San Francisco Bay Region, is the public agency with primary responsibility to protect ground and surface water quality within the San Francisco Bay area.

During the last six months the Regional Board has become aware of numerous subsurface leaks from sumps and subsurface tanks which have the potential to degrade and have degraded groundwater supplies. These problems have been brought to the Regional Board's attention by industry as a result of voluntary surveys of the containment ability of their various facilities. At their March 17, 1982 meeting the Regional Board decided that a program should be implemented to determine the overall magnitude of this leakage problem.

The majority of the problems encountered to date can be traced to leaks, from sumps used for wastewater pretreatment, from subsurface tanks storing chemical wastes and non-waste materials and from auxiliary piping systems. Materials leaked from these facilities have migrated both vertically and laterally into groundwaters and, in some cases have adversely impacted municipal groundwater supplies.

Based on these problems and the necessity to protect groundwaters from contamination the Regional Board believes that the implementation of a reasonable testing program to detect possible leaks from sumps and subsurface tanks is necessary. The intent and benefit of this program is to detect leaks at an early stage to prevent serious groundwater degradation problems which are very difficult and costly problems to mitigate. While we realize that this program may be an inconvenience to you and, in some cases, may entail considerable expense, we believe that the benefits to be derived from this testing program as described above bear a reasonable relationship to the costs.

This letter is being sent to approximately 1400 facilities and has been sent to you as we believe that your facility may contain one or more of the previously identified potential sources and you are geographically in a area (see attached map) of groundwater usage and concern. Therefore, pursuant to Section 13267(b) of the California Water Code we request you to complete and submit the attached questionnaire which will describe any existing or former sumps, subsurface tanks or subsurface piping at your facility. The answers to this questionnaire will be used to determine if and when you must

implement a program to determine if the units described above are leaking (except as provided in the next paragraph). Please submit this questionnaire to the Regional Board by May 31, 1982. The return of this questionnaire is required and it must be signed and returned even if you indicate "no" for all responses in sections IV and V.

As described in the previous paragraph the responses to the questionnaire will be used to determine if and when you will be required to implement a program to determine if the units described are leaking. We believe that certain units which have a significantly greater potential for developing leaks can now be identified. Therefore, if your response to the questionnaire indicates that your facility has or had either a:

- non-vaulted buried waste solvent tank without corrosion protection which was placed in operation prior to January 1, 1975; or
- concrete sump into which solvents were or are being discharged for the purpose of storage, treatment, separation or disposal

you are now required to implement an investigation which will determine if these units were or are leaking. This request is based on the belief that these type of units have the greatest leak potential. The attached "General Guidelines for Subsurface Investigation" may be used to make this determination or you may submit in writing an alternative investigation program which must be approved by me prior to its implementation. A final report on the results of the guideline program or alternate program shall be submitted by August 31, 1982. If this report indicates that you have or have had a leak of hazardous materials at your facility which could adversely affect water quality you may be requested to investigate the extent of any problem caused by the leak.

Unless you meet the criteria described in the above program you are respectively requested not to implement the guideline program at this time in order to allow those higher risks facilities to implement the program. You are requested to retain the attached "General Guidelines for Subsurface Investigation" which may be the basis for a leak detection program. We will contact you at a later date to provide further instructions on implementation of a leak detection program.

It is our intent to hold a public workshop to answer any technical questions you may have regarding this letter. The date, time and place of this workshop is indicated on an attachment. You and your consultant are invited to attend. If you have any questions after that date please contact the Regional Board's Toxic Division at (415) 464-1255.

Sincerely,



FRED H. DIENER
Executive Officer

Attachments:

1. Map of Program Implementation Area
2. Facility Questionnaire
3. Guidelines for Subsurface Investigation
4. Workshop Information

VI. For each item in IV and V above please provide the following information if known, as an attachment to this questionnaire.

1. Size (gallons, cubic feet)
2. Construction materials of each unit
3. Schematic of unit showing; distance from ground surface to top and bottom of unit and attached piping.
4. Plot plan showing location of all units and relevant buildings.
5. Specific composition of materials which unit holds. Use the most recent chemical Abstract Service Name and number (if known) or chemical name (not trade name).
6. Year unit installed, year unit placed in operation and, if applicable, removed.
7. If flow-through treatment unit list daily volume
8. Describe any corrosion protection provided to unit and nature of monitoring this protection.
9. Describe any regular procedures used to determine the integrity of the unit and the results of these procedures.
10. Describe any repairs made to these units which could be indicative of some failure of the units integrity.

**ATTACHMENT 1 – MAP OF PROGRAM
IMPLEMENTATION AREA**

**REQUEST TO COMPLETE MANDATORY
FACILITY QUESTIONNAIRE**

**THE ABOVE IDENTIFIED ATTACHMENT IS NOT
AVAILABLE.**

**EXTENSIVE RESEARCH WAS PERFORMED BY
NAVFAC SOUTHWEST TO LOCATE THIS
ATTACHMENT. THIS PAGE HAS BEEN INSERTED
AS A PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.**

QUESTIONS MAY BE DIRECTED TO:

**DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132**

TELEPHONE: (619) 532-3676

ATTACHMENT 2 – FACILITY QUESTIONNAIRE

**REQUEST TO COMPLETE MANDATORY
FACILITY QUESTIONNAIRE**

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**ATTACHMENT 3 – GUIDELINES FOR
SUBSURFACE INVESTIGATION**

**REQUEST TO COMPLETE MANDATORY
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ATTACHMENT 4 – WORKSHOP INFORMATION

**REQUEST TO COMPLETE MANDATORY
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