



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

February 19, 1986

Tom Berkins
California Regional Water Quality Control Board
San Francisco Bay Region
1111 Jackson Street, Room 6040
Oakland, CA 94607

Subject: Moffett Field NAS

Dear Mr. Berkins:

Based on discussions that took place between the Regional Water Quality Control Board (RWQCB) and the Environmental Protection Agency (EPA) on January 30, 1986, the EPA affirms its concurrence with the (RWQCB) on the nine (9) major issues (attached) and the stipulations made regarding the final draft, Naval Air Station (NAS) Moffett Field Confirmation Study (Verification Step).

For the evolution of a clear and concise report with reliable data, the following comments are reiterated for submission to NAS Moffett Field, as appropriate:

- EPA recommends that NAS Moffett Field prepare a base map with a grid coordinate system that can be used as a reference throughout the report.
- EPA understands that the RWQCB will request relevant data from NAS Moffett Field and determine the integrity of the wells installed during Phase II efforts. I suggest that your evaluation criteria include the proper depth for the monitoring of the aquifer desired, sand packing and the placement of the well screens. An analysis of the validity of the data generated to date would also be appropriate if any of the wells are found to be of improper construction.
- Figures 4-2, 4-5 and 4-10 in the report appear inaccurate and should be corrected. The geologic cross sections shows the aquifers being in the aquitards (according to the explanation drawing.) The amended cross-sections should also show the location of all well screens.
- In Section 4 of the Confirmation Study a site map should accompany each site description. Wells used to monitor the site should also be included.

- All underground tanks identified to date, especially in the fuel farm, should be included in the report. The tank size, tank construction material (concrete, steel), and contents should be included along with the grid coordinates from the base reference map.
- The sample results reported in Tables 1 through 16 should clearly identify those analysis that were not conducted.
- Plates 1, 2, 3, and 4 are cut in such a manner that site identification is confusing because certain sites are bisected. Sites should not be cut onto different maps.

NAS Moffett Field should be advised that the ongoing Confirmation Study will have to conform to the National Contingency Plan (NCP) in order to qualify for eventual delisting from the National Priorities List. Accordingly, prior to the commencement of future Confirmation Study efforts, and in compliance with the NCP, NAS Moffett Field will be expected to prepare and submit for Regulatory Agency review and concurrence, three stand alone documents: (1) A Quality Assurance Project Plan (QAPP) (2) A Sample Plan and (3) a Community Relations Plan.

The QAPP and the Sample Plan will assure that data generated by the Navy is appropriate, valid, reliable, defensible, reproducible and meets the standards of site investigation work. We are requiring of the other potentially responsible parties associated with this area-wide ground water problem. Review of these documents will also assure that field work at NAS Moffett Field will progress with the full concurrence of our respective agencies. Examples of these documents will be made available.

I look forward to working with you on this site. If you have any questions regarding these comments, please do not hesitate to contact me, at (415) 974-7725.

Sincerely,



Lewis Mitani
Remedial Project Manager
Federal Response Section

Attachment

cc: Gil Torres, SWRCB
Tom Iwamura, SCVWD
Charles Armstrong, DOHS
Alex Dong, WESTDIV
Phil Parisius, MNTV
- Ens. Deanna Hawkins, Moffett NAS
Charles Nickolson, SCCo.

MAJOR ISSUES

1. Definition of extent of contamination
 - need to define extent of contamination in lower water quality areas
2. Private well program
 - include wells off-site the Naval Air Station
 - gather additional available information
 - additional investigations necessary
3. Well installation procedures
 - geophysical logs
 - well screen and sand pack placement
 - monitoring discrete zones
4. Disposal/decontamination procedures for soil and water
 - soil containment, analyses, and disposal
 - water containment, analyses, and disposal
5. Aquifer tests
 - short and long term tests
 - slug tests
6. Reference elevation and coordinate system
 - reference to USGS Mean Sea Level Datum
7. Sampling for major anions and cations
8. Report format
 - include water quality data on concentration contour maps
 - indicate well screen interval, sand pack interval, and soil sampling points on cross-section maps
 - include soil and groundwater quality data on cross-section maps
 - tables presenting monitoring well construction data
9. Underground fuel tanks
 - status and history of tanks
 - location
 - description
 - monitoring program