



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 26, 2000

Andrea Muckerman
BRAC Environmental Coordinator, Moffett Naval Air Station
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Dear Ms. Muckerman:

EPA has reviewed the Quarterly Post-Closure Monitoring Reports, 1st, 2nd, 3rd, and 4th Quarters, Sites 1 and 2 Monitoring and Landfill Maintenance, Moffett Field, California.

Our comments are enclosed. Please contact me if you have any questions regarding the enclosed. We are beginning our review of the Final As-Builts and Remedial Action Completion Report (Vol. 1&2), as well. It would be helpful if you could clarify what the relationship between these two reports is, and how you will address comments on the Quarterly Monitoring Reports, such that relevant information can be used in our review of the RA Completion Report.

We appreciate the opportunity to work with you toward the closure of this Operable Unit. Please call me at (415) 744-1685 for further discussion.

Sincerely,

A handwritten signature in cursive script that reads "Roberta Blank".

Roberta Blank
Remedial Project Manager

cc: Joseph Chou, RWQCB
Dr. James McClure, RAB
Jo Ann Cola, EPA MEW RPM
Glenn Young, CIWMB

**Review of the Quarterly Post-Closure Monitoring Reports 1st, 2nd, 3rd, and 4th Quarters
Sites 1 and 2 Monitoring and Landfill Maintenance, Moffett Field, California**

GENERAL COMMENTS

1. The Quarterly Post-Closure Monitoring Reports for Sites 1 and 2 at Moffett Field, California (Quarterly Reports) present methane gas sampling results for Site 1; however, the Quarterly Reports do not include an evaluation of the results, nor do they compare the results to any compliance criteria. In addition, the methane gas results vary from quarter to quarter and the significance of this variation is not discussed. In order to better evaluate the methane gas measurements, please revise the Quarterly Reports to include a comparison of the methane gas measurements with compliance criteria and discuss the significance of changes in methane gas levels from quarter to quarter.
2. The Quarterly Reports include water level measurements from 14 wells and piezometers at Site 1 and eight wells at Site 2; however, the water level measurements are not evaluated. In order to better evaluate the water level measurements, the Quarterly Reports should include a discussion of the significance of water level measurements and changes from quarter to quarter, and should include groundwater flow direction and groundwater elevation contours on a figure.
3. The Quarterly Reports presents analytical results for groundwater samples collected from eight monitoring wells at Site 1 and six monitoring wells from Site 2; however, the analytical results are not evaluated. In order to evaluate the significance of analytical results for groundwater, please revise the Quarterly Reports to include a comparison with compliance criteria and discuss the significance of changes in groundwater chemical concentrations from quarter to quarter.
4. Figure 1 depicts a groundwater extraction trench at Site 1 and identifies groundwater extraction wells W1-22 and W1-23; however, groundwater extraction is not discussed in the Quarterly Reports. Please revise the Quarterly Reports to include a discussion of monitoring and maintenance activities associated with the groundwater extraction trench and monitoring wells. In addition, please include an evaluation of the effect of groundwater extraction on the groundwater gradient at Site 1 and include an evaluation of whether the groundwater extraction trench and monitoring wells are achieving their designed goals.
5. The Quarterly Reports do not include a description of maintenance activities that occurred during the preceding quarter. For completeness, please revise the Quarterly Reports to include a description of maintenance activities and how these activities were completed.

6. The Quarterly Reports do not include a reference to an approved long-term or post-closure monitoring and maintenance plan. For completeness, please include a reference to the "Moffett Federal Airfield, California (Formerly Naval Air Station Moffett Federal Airfield), Site 1 Landfill, Draft Final Closure Plan and Postclosure Maintenance Plan"; prepared by Tetra Tech EM, Inc., dated February 5, 1998 or to the final version of this plan.

SPECIFIC COMMENTS

1. **Section 1.0, Page 1:** The Introduction describes the two landfill comprising OU1 as Runway Landfill (Site 1) and the former Golf Course Landfill (Site 2); however, the locations of these landfills at Moffett Federal Air Field are not shown on a figure. To facilitate the review, the Quarterly Reports should include an area map indicating the locations of the landfills at Moffett Field and surrounding features.
2. **Appendix B, Table B-1:** The table summarizing analytical results for Sites 1 and 2 does not include an explanation for the values listed in bold. For clarity, please add a note to Table B-1 explaining the significance of bold values.