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14 AUG 1989

Commander, Western Division Naval  
Facilities Engineering Command  
Attn: Kathy Nakazawa, Code 1811KN  
P.O. Box 727  
San Bruno, CA 94066-0720

Dear Kathy:

Please find enclosed the Environmental Protection Agency's comments to the Phase II Proposals for Sites 4, 6, 7 and 8 at NAS Moffett Field. As stated in our comments to the Phase II Proposals for Sites 3, 5, and 9, the use of the Hydropunch should be a useful screening tool for locating monitoring wells.

However, as stated in our general comments, work to be performed should be discussed in a specific section, addendum or by reference to the Sampling Plans, QAPP and the Health and Safety Plan to assure compliance with established protocol. Specifically the Data Quality Objectives (DOQ) and analytical protocol for the fast turn around of groundwater samples as well as the sampling protocol from the hydropunch should be discussed.

The EPA understands that addendum(s) addressing the Hydropunch are to be submitted to the regulatory agencies for review and comment prior to the start of Phase II work. We look to working with the Navy on this interesting technique. If you have any questions please give me a call at (415) 974-8936.

Sincerely,

A handwritten signature in cursive script that reads "Lewis Mitani".

Lewis Mitani  
Remedial Project Manager  
Federal Enforcement Section

Enclosure

CC: Regional Water Quality Control Board (Lila Tang)  
Department of Health Services (Don Cox)  
Metcalf & Eddy (Don Turner)

733  
EPA/NAVY 16

EPA Comments to Proposed Phase II Work  
Sites 4,6,7 and 8 NAS Moffett Field

General Comments

1. Addendums should be produced for the existing Sampling and Quality Assurance Project Plans to address sampling procedures and quality assurance protocol for the cone Penetrometer and Hydropunch. In particular decontamination and well abandonment procedures (penetrometer/hydropunch hole) should be discussed.
2. Water Samples from the Hydropunch will be turned around in 48 hours. Other than fast turn around the proposal did not indicate any variance with the QAPP analytical protocols. Is there a variance with current QAPP?

Specific Comments

Site 4, 6, and 7

1. Page 2, paragraph 1. Reference is made to two former ponds which were replaced by the two existing ponds. The location of the two former ponds are not identified in Figures 1 and 2 or in the text.
2. Page 3, paragraph 1, and Section 3.0, item 3. In paragraph 1 it is stated that six existing wells were sampled at Site 7. Our records indicate that only 5 existing wells were sampled: W7-1-(A), W7-4(B1), W7-8(A), W7-13(A), W7-15(B). Section 3.0, item 3, states that an existing C-aquifer well was sampled. Our records show that the only C-aquifer well at this site is the new well W7-16(C).
3. Page 14, paragraph 1. The location of proposed well W4-12(B) is questioned because the well is located along the fringe of the A-aquifer plume and is not located in a downgradient location.
4. Page 14, paragraph 1. Because existing data does not indicate contaminants in the B-aquifer, it is suggested that the proposed well 4-13(B2) be completed in the B1-aquifer to determine if contaminants from the A-aquifer plume have reached the uppermost part of the B-aquifer.
5. Figures 1 and 2. The control for establishing the downgradient extent of the contaminant plume appears to be arbitrary. It is suggested that an A-aquifer well be located downgradient along the axis of the plume to establish its northerly extent.

## Site 8

1. Page 1, paragraph 2. It is stated that the sump and tank were removed. Figure 1 shows the location of an existing sump and tank near well 8-1(A). Presumably, these are the locations of the former sump and tank. If so, the Figure 1 legend should be amended to indicate such.

2. Page 5, paragraph 2. As stated, the origin of the chlorinated solvent plume is unknown. In this context, it is suggested that concurrent sampling of MEW wells and NAS Moffett Field wells be performed to characterize the plume within the A and B aquifers both at and in areas peripheral to Site 8.

3. Page 5, paragraph 2. It is stated that four CPT/Hydropunch locations will be established just east of Building 127 to determine if this building is a potential source. It is not clear why the east side of the building is being investigated. The CPT/Hydropunch locations are not shown in Figure 1, although three locations are shown along the north side of the building. The purpose of the latter three locations is not explained in the text. Figure 1 also identifies another CPT/H location due north of Building 127, the purpose of which is not stated in the text.

4. Page 5, paragraph 3. Three locations are identified for CPT/H at Phase I boring sites. Soil samples also showed relatively high TPHC at W8-6A, yet no further investigations are proposed in the area. It is recommended that a more comprehensive investigation be undertaken in the Site 8 storage yard to identify soil contamination by hydrocarbons.

COMMENTS ON PHASE II FOR SITES 4, 6, 7 AND 8

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Page 1, para 1, line 9: Change "objective" to "purpose."

Page 1, para 2, line 5: Insert comma after "sump" and delete "and."

Page 3, para 2, line 7: It should read "GB-25" and not "BG-25."

Page 5, para 2, last sentence: The sentence states that four CPT/Hydropunch locations will be located east of Building 127. Figure 1 shows them located as three north of the building and one east of it.

Page 5, para 3, last sentence: The CPT/Hydropunch locations in the sentence are not depicted in Figure 1.

Page 5, para 4, last line: The SAP states that the well originally planned for Phase II was a B1 well near W8-1(A), and not a B2 well.

Appendix A: Where is the soil data for W8-3(C)?

Figure 1: What is the basis for planning a CPT/Hydropunch in the SB1-3 area?

Why is CPT/Hydropunch between SB4 and SB6 and not down gradient of SB4 based on the TFHC data for SB4 ?

Is the rationale for relocating the B1 well from the SAP based on data completion for the wells located near GB-26? Why was the B2 chosen instead of the B1 planned?

The SAP indicated that only one A well will be installed in Phase II. Are you anticipating a maximum of three A wells or just depicting where the one well might be located?

Why are you planning the CPT/Hydropunch along the north side of Building 127? Is this a suspected source?

Why is there a CPT/Hydropunch planned approximately 200 feet north of Building 127?

Why wasn't the MEW-92(A) well resampled?