

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

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November 29, 1989
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Office of Environmental Management,
Western Division
Naval Facilities Engineering Command
900 Commodore Drive, Bldg. 101
P.O. Box 727
San Bruno, CA 94066-0720
Attn: Stephen Chao, Code 1813SC

Subject: Comments on Attachment 4 (to FFA) dated November 15, 1989

Dear Stephen:

Below are our comments on Attachment 4 to the FFA.

Tank & Sump Removals

This section currently does not provide a mechanism for oversight by the agencies of the activities planned. A report and review process, although cumbersome is necessary to ensure that the work performed is satisfactory. We suggest adding tasks for submittal of the following reports to the agencies:

1. The Navy should prepare a response to EPA and Regional Board comments on the Removal Action Plan for Tanks 2, 14, 43, 53, 67, 68 and Sump 66 30 days prior to the initiation of field work; in other words, 30 days after contract award (1 January 1990).
2. Tank Removal Plan - The Navy should document what procedures will be followed during tank removal activities to ensure that the procedures are satisfactory to the agencies. A plan which describes in general these procedures with sections or attachments detailing soil and groundwater sampling and special conditions for each tank/sump or group of tanks/sumps. The submittal date for this plan should be 30 days after contract award (1 April 1990). This plan can also be used to satisfy item one above. If this is the case, it should be submitted by the deadline specified above (1 January 1990).
3. Soil and Groundwater data from tank removal actions - These data should be submitted 3 months after installation of the last "tank/sump removal monitoring well". The report should summarize the data and present the rationale used for determining whether source control is necessary at each site.
4. Design Plan for Source Control - This should be submitted 30 days after initiation of source control design.

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Mr. Stephen Chao
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Phase II IRM's at Sites 8 & 9

Site 9 is addressed as part of this section as well as in the Tank & Sump Removals section. It is our understanding that the Site 9 areas covered under this section include all areas not covered under Tank & Sump Removals (Tanks 47, 48, 49, 50, and 56A-D). We suggest adding another footnote or expanding footnote [6] to clarify this point.

Phase II IRM's at Sites 12 & 14 (Tanks 19 & 20)

The title to this section should be corrected to "Phase I IRM's ..."

As reported in the status report for September 1989, the date of the last groundwater sampling for Phase I data at these sites is September 20, 1989. From this, actual dates for the deadlines of the first two items can and should be established.

Site Investigations for Inferred Sources 8 & 9

There is currently no definition of "inferred sources 8 & 9" in the FFA. We believe a definition ~~is~~ necessary and suggest adding it either through a description in a footnote or by reference to a report which describes the inferred sources.

Footnotes

Footnote [3] should be modified to indicate that it applies to all the tanks/sumps listed.

If you have any questions, please call me at (415) 464-0884.

Sincerely,



Lila Tang
Area Engineer

cc: . Lewis Mitani, EPA
Lynn Nakashima, DHS
Tom Iwamura, SCVWD
Lee Esquibel, SCCHD
Russ Frazer, City of Mountain View