

DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL PROGRAM

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March 27, 1991

Mr. Stephen Chao
Department of Navy
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Building 101
San Bruno, CA 94066-0720

Dear Mr. Chao:

NAS MOFFETT FIELD SITE 9 ACTION MEMORANDA

Upon reviewing the NAS Moffett Field Site 9 Action Memoranda, Department of Health Services(DHS) has the Following comments:

General Comments:

1. It should be noted that this report does not provide sufficient data on buildings 29,45 and 88. The results of the fuel farm investigation are not included in this report as well. The interpretation of tank and sump investigations is also lacking thus, postponing the DHS concurrence. These data gaps will not allow to arrive at a comprehensive understanding of this study area. Such data are needed to be included to ascertain the source(s). DHS will review the Revised Final Action Memoranda including the above data to arrive at a decision. However, the proposed alternative remedy might remain the same.
2. PRC Environmental Management's (PRC) definition of Aquifers and renaming them differently will confuse further the complexity of this study area. International Technology Corporation(IT) has defined the aquifers into different zones, for example, A1, A2, etc. An explanation is required if PRC wishes to differ on its understanding of zoning the aquifers with IT. And if it is found to be justified then, IT has to follow the same zoning. It is imperative that WESTDIV adopts one set of definition to attenuate furthering the confusion. In addition, site 9 has been divided into different subsites. It is not clear if the Navy wishes to adopt this division. A clarification is required.

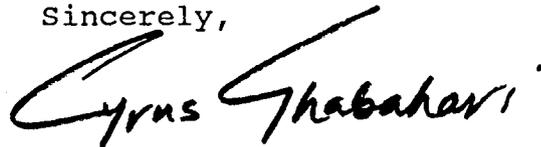
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Specific Comments:

1. Page 17, Figure 5, the site boundary in this report and in the IT's last quarterly report are not the same. A clear and consistent site boundary is needed to focus the cleanup process.
2. Page 37, last paragraph, if it is determined that the large range observed for the well 9 is due to poor sampling, then it must be explained and documented as to why you believe such range occurred. Furthermore, what do you propose to stop repeating such occurrences in the future?
3. Page 46 paragraph 3, the MCLs are ARARs and must be identified as such. For example, pursuant to California Code of Regulation Title 22 Article 5.5 the maximum contaminant level of Benzene for the primary drinking water should not exceed 1 Mg/L.
4. Page 47, paragraph 1, it is to be noted that the 100 mg/kg cleanup level of xylene in the soil is not a cleanup level. It is merely a cleanup target. The cleanup level will be determined upon the results of the base-wide Risk Assessment.
5. Page 114, paragraph 1, the number of underground tanks is nebulous. It has been reported that there are 11 tanks on page 18, however, on page 45 it is said "10 or 11". And on page 114 it is said to be 10. This uncertainty should be clarified.

Sincerely,



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Admin Record