



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
1235 MISSION STREET
SAN FRANCISCO, CA 94103

02 JUL 1990

Western Division Naval Facilities
Engineering Command
Attention: Mr. Steven Chao
900 Commodore Drive, Building 107
San Bruno, CA 94066

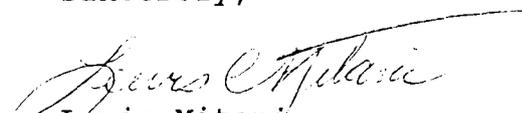
Dear Mr. Chao:

The Environmental Protection Agency (EPA) has received Naval Air Station Moffett Field's (NASMF) Phase I Tank Removal Draft Field Work Plan prepared by PRC Environmental Management, Inc.. Our comments on the tank removal are enclosed.

Comments which may impact your current field activities on the Phase I tank removals were discussed at the May 16, 1990 project managers meeting. EPA believes consensus was reached on all concerns raised including the analytical suite for tank contents, soil and groundwater sample analysis.

If you have any questions please give me a call at (415) 744-1996.

Sincerely,


Lewis Mitani
Remedial Project Manager

enclosure

cc: Distribution List

1123
ENCLOSURE (1)

Distribution List

Lila Tang
Regional Water Quality Control Board
San Francisco Bay Region
1800 Harrison Street
Oakland, CA 94612

Lynn Nakashima
Department of Health Services
Toxic Substances Control Division
2151 Berkeley Way, Annex 7
Berkeley, CA 94704

Sue A. Loyd
CDM Federal Programs Corporation
301 Howard Street, Suite 910
San Francisco, CA 94105

Comments to Phase I Tank Removal Draft Field Workplan
Volumes I and II

General Comments

1. Missing Section

Section 1.0. appears to be missing.

2. Clarification

The tank removal process appears to have two phases. Phase I involves pit excavation, removal of tank contents, and tank removal. Phase II involves contaminant monitoring, soil excavation and soil removal. The introduction and sections 3 and 4 of the workplan should clearly present this two phase approach.

3. Consistency with the RAP

The draft workplan prepared by PRC is not consistent with the Removal Action Plan (RAP) for tanks 2, 14, 43, 53, 67, 68, and sump 66, prepared by IT Corp. Page 4-5 of the RAP states that soil samples will be analyzed for VOCs, pH, TPH, metals, and BNAs. The draft workplan based analyte selection (for soil and groundwater sampling) on the reported use of the tanks and analytical results of soil and groundwater near the tanks. Soil and groundwater in the vicinity of the tanks and sump should be analyzed for the parameters reported on page 4-5 and table 32 of the RAP. This information should be included in the PRC tank removal workplan.

Also, the draft workplan is not consistent with the RAP for sampling the contents of the tanks and sump. On page 4-10 of the RAP a description of waste characterization of tank contents is given. The RAP states that tank contents will be analyzed for VOCs, BNAs, pH, metals, specific conductivity, ions, TDS, and TPH. However, the text of the workplan does not mention waste characterization or describe sampling and analysis procedures for analyzing tank contents. This information should be presented in section 4.2.2 of the draft workplan.

SPECIFIC COMMENTS

1. Page 10, Paragraph 2, Section 2.3.1

This paragraph states that the volume of tank 67 is 20,000 gallons. However, the Removal Action Plan prepared by IT Corp states that the volume of tank 67 is 2,000 gallons. Which volume is correct?

2. Page 18, Paragraph 1, Section 3.0.

If waste characterization on tank contents will be performed, a description of the process should be included in this section. Results of the characterization should also be included in the draft and final interim summary report.

3. Page 19, Paragraph 1, Section 3.1.

Section 3.1, paragraph 2, page 18 of the workplan, describes the minimum soil samples to be collected after tank removal and pit excavation. Paragraph 1, on page 19, describes two more samples will be collected at the ends of the excavation.

What is the definition of "ends", sides only or also the bottom of the excavation? Collection of soil samples after tank removal, pit excavation, and soil removal should include sampling the sides as well as the bottom of the excavation.

4. Page 21, Table 2.

This table should include the total depth and screened interval of each well. This information can be obtained from KJC reports and IT quarterly reports for NAS Moffett.

5. Page 22, Paragraph 4, Section 3.3

Tank 2 is reported to be a hazardous waste tank. All hazardous waste tanks should be analyzed for the full suite of analytes presented on Table 2. Historical disposal practices on military installations are reported to have been haphazard, and mixtures of chemicals were indiscriminately disposed of down sumps, underground tanks, drains, etc. Analysis of tank 2 samples should include priority pollutant metals.

6. Page 30, Paragraphs 1, 2, 3, and 4, Section 3.4

Groundwater and soil samples from the area near tank 53 (a former underground gasoline storage tank) should be analyzed for lead in addition to VOCs, BTX, and TPH nonextractables.

It is recommended that samples for sump 66, tank 67 and tank 68 be analyzed for BNAs and metals. These tanks and sump were used for waste storage. Other wastes, besides that ones reported may have been disposed into these units. Analyses of tank contents would assist in determining the appropriate analytes for soil and groundwater sampling. Without specific knowledge about the wastes stored inside the tanks and sump, soil and groundwater samples should be analyzed for all analytes presented in Table 2.

7. Page 32, 2nd Paragraph, Section 4.2.1

The first sentence assumes surface material covering the top of tanks is uncontaminated. A rationale for this statement should be presented. In many instances fill pipes are exposed near the surface of underground storage tanks and visible evidence of surface contamination is present.

8. Page 32, Paragraph 3, Section 4.2.2

Will tank contents be sampled? How will sampling be performed and what analytes will be analyzed. Waste characterization will be required for proper disposal and/or treatment. Also see general comment 2.

9. Page 32, 5th Paragraph, Section 4.2.4

How will clean material be differentiated from contaminated material, this procedure should be described in this paragraph.

10. Page 33, 4th paragraph, Section 4.3

The volume of backfill used to bring the excavation up to grade should be included in the draft and final interim action summary report. This information will be required for soil volume estimates to be presented in the feasibility study. This information is important, especially if any soil contamination remains after the completion of this interim action.

11. Page 33, 2nd bullet

How will the PID be used to discern between source materials. —

12. Page 35, Section 4.6

Who will approve that gross contamination has been removed and that the excavation can be backfilled. This information should be reported in this section.

13. Page 38, Paragraph 3, Section 4.9

If no immiscible fluids are observed will groundwater sample be collected? This paragraph should be revised to clarify that floating product will be sampled in addition to sampling groundwater from the aquifer formation.

14. Page 41, Section 4.11

Sample IDs should indicate where in the excavation (e.g. north wall, south wall, bottom etc.) the soil samples will be collected.