

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
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(510) 540-3724

November 21, 1991

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

Dear Mr. Chao:

NAVAL AIR STATION MOFFETT FIELD SITE 9 TECHNICAL MEMORANDUM

The Department of Toxic Substances Control has reviewed Moffett Field Site 9 Technical Memorandum and has the following comments:

General Comment:

Throughout this report, the soil investigation fails to provide an adequate information on the extent of the contamination. Although, there is a conclusive evidence of soil contaminations at some sections of site 9, there is no treatment proposal given at this time. It is important to note here that by treating the contaminated water, the soil contamination shall remain unchanged for near foreseeable future. The report points out to building 88 as a solvent source in the A1 zone; however, at other points at this site the source is not identified or it is said to be possibly from the cross contamination from the A2 zone. If this is the case then by treating the A1, the A2 will intervene. The Navy must discuss this likely scenario with the MEW companies to arrive at a consensus. The report does not discuss this.

Specific Comments:

1. Page 8, paragraph 1, the A2 MWs show some Xylene levels. Please provide an explanation.
2. Page 19, paragraph 1, table 2 does not provide any sampling result. It only identifies the CPT number, date, depth and sample zone. Furthermore, the remaining 10 CPT providing additional stratigraph information is not given.
3. Page 20, please provide information on the 1600-gallon tank.
4. Page 24, paragraph 2, the information on the 30 chemical samples are missing.

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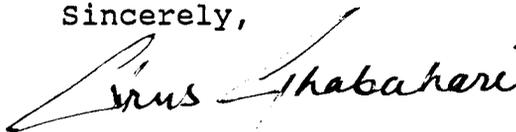
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5. Page 31, paragraph 2, it is not clear if IT is conducting the Aquifer testing on this area. If yes, then why is It duplicating the work?
6. Page 57, the MCL for metals are provided in Title 22.
7. Page 63, paragraph 2, the aquifer testing requires more information on the A1 and A2 connection.
8. Page 86, paragraph 3, please provide a rational on how it could be determined that the A1 contamination in southwest area is due to the cross contamination from the A2 zone.
9. Page 99, top paragraph, what are the remedial objectives at this site? Why the source control measures are not consistant with the remedial objectives? The issue of one year time limit is for time critical removals only.
10. Page 100, paragraph 2, the DTSC is highly recommending the Navy to consider the UST removal because if they stay in place future liabilities will remain with the Navy. In addition, since Moffett field is to be closed leaving the USTs in the ground is not acceptable.
11. Figure 10, the TCE contour map is different than that of the IT (5/91 quarterly report). Why is there a difference?
12. Table 25, xylene results are missing from this list, since it is a good indicator for BTEX.

If you should have any questions, please call me at (510) 540-3821.
Thank you.

Sincerely,



Cyrus Shabahari
Waste Management Engineer
Site Mitigation Branch

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