

5090
Ser 1813SC/L2121
24 JAN 1992

From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: RESPONSE TO AGENCY COMMENTS

Encl: (1) Response to comments by the EPA & RWQCB of North Base Area Field
Investigation Report

1. Please find enclosure (1) the Navy's response to Environmental Protection Agency and Regional Water Quality Control Board comments on the Draft North Base Area Field Investigation Report. As you know additional investigations to further characterize the hydrogeology and extent of contamination in the North Base Area are planned. Your comments will be carefully considered as we write the work plans for these new studies.

2. For further information please contact Mr. Stephen G. Chao, Code 1813SC at Commercial (415) 244-2563.

Sincerely,

Original signed by:

Stephen G. Chao
Project Manager

Distribution:

U.S. Environmental Protection Agency (Attn: Lewis Mitani) 1309
Department of Toxic Substances Control (Attn: Cyrus Shabahari) 1310
Regional Water Quality Control Board (Attn: Wilfred Bruhns) 1311

Copy to:

SAIC/TSA (Attn: Fred Molloy)

Blind copy to:

(w/o encl) 181, 1813, 1813PK,09C9
(w/encl) 1813SC, Admin. Record (w/2 copies),NAS Moffett Field (Code 189, Jim Haas)
IT Corp. (Attn: Don Cox, Martinez) (Attn: Keith Bradley, Knoxville), Martin Marietta Energy
Systems, Inc. (Attn: Paula Pritz),PRC Environmental Management, Inc. (Attn: Thomas Adkisson)
Writer: Stephen Chao, 1813SC, x2563
Typist: M. Marshall, 23 Jan 92, 11/91
File: MOFFETT/NBA

1309
1310
1311

~~NIR 159~~

NORTH BASE AREA FIELD INVESTIGATION REPORT
SPECIFIC COMMENTS FROM CALIFORNIA REGIONAL WATER QUALITY
CONTROL BOARD (CRWQCB). [Letter from Steve Morse, Chief, South Bay
Division
dated September 9, 1991]

Specific Comment 1: Paragraph 1: A determination needs to be made whether the groundwater is discharging into the wetlands, and if so, what impacts this may have.

Navy Response: The Navy is currently preparing a work plan describing field work designed to better define the vertical and horizontal limits of contamination. As part of this study, a determination will be made as to whether an upward or downward gradient exists in the area of the wetland. This will be done by comparing the elevation of the piezometric surface with the ground surface in the wetland.

Specific Comment 2: Paragraph 1: If water currently exists in the wetlands, it should be sampled near the bottom of the water column to determine if chemicals are migrating into the wetland.

Navy Response: At the time of this study, no water existed in the wetland.

Specific Comment 3: If the groundwater could be discharging to the Creek it should also be sampled.

Navy Response: It is the Navy's understanding that NASA Ames is preparing to sample groundwater and surface water in and near Stevens Creek.

Specific Comment 4: Paragraph 3: As an alternative to drinking water standards, attached are potential water quality objectives developed by this Board's staff....These objectives should be compared to any surface (or groundwater) samples collected in the wetlands or Stevens Creek.

Navy Response: Table 3 of the Field Investigation Report has been modified to reflect these objectives. These objectives will be considered in future investigations in the North Base Area. The modified Table has been included with these responses.

**NORTH BASE AREA FIELD INVESTIGATION REPORT
SPECIFIC COMMENTS FROM CALIFORNIA REGIONAL WATER QUALITY
CONTROL BOARD (CRWQCB). [Letter from Steve Morse, Chief, South Bay
Division
dated September 9, 1991]**

Specific Comment 1: Paragraph 1: A determination needs to be made whether the groundwater is discharging into the wetlands, and if so, what impacts this may have.

Navy Response: The Navy is currently preparing a work plan describing field work designed to better define the vertical and horizontal limits of contamination. As part of this study, a determination will be made as to whether an upward or downward gradient exists in the area of the wetland. This will be done by comparing the elevation of the piezometric surface with the ground surface in the wetland.

Specific Comment 2: Paragraph 1: If water currently exists in the wetlands, it should be sampled near the bottom of the water column to determine if chemicals are migrating into the wetland.

Navy Response: At the time of this study, no water existed in the wetland.

Specific Comment 3: If the groundwater could be discharging to the Creek it should also be sampled.

Navy Response: It is the Navy's understanding that NASA Ames is preparing to sample groundwater and surface water in and near Stevens Creek.

Specific Comment 4: Paragraph 3: As an alternative to drinking water standards, attached are potential water quality objectives developed by this Board's staff....These objectives should be compared to any surface (or groundwater) samples collected in the wetlands or Stevens Creek.

Navy Response: Table 3 of the Field Investigation Report has been modified to reflect these objectives. These objectives will be considered in future investigations in the North Base Area. The modified Table has been included with these responses.

EPA COMMENTS - North Base Area

Field Investigation Report [Letter from Lewis Mitani, Remedial Project Manager, dated November 13, 1991]

General Comment 1: Section 2.3.1, Page 11: This paragraph states water samples were transferred from the Hydropunch sampler into two 40 ml. VOA vials. Why were three 40 ml VOA vials not used as stated in the North Base Area (NBA) Investigation Work Plan?

Navy Response: When the work plan was being written, our contact at the lab suggested that three bottles of sample be collected. However, the chemist operating the mobile laboratory requested that we limit the amount of sample to two bottles.

General Comment 2: Section 3.0, Page 12: This section states the mobile laboratory analyzed the samples using EPA Method 8010/8020. However, Table 1 of the NBA Investigation Work Plan indicates samples would be analyzed using EPA Method 601. Why the change in analytical methods?

Navy Response: Table 1 of the NBA Work Plan should have stated that the samples would be analyzed by EPA Method 8010/8020 rather than EPA Method 601. EPA Method 601 is applicable to waste water and municipal water, EPA Method 8010/8020 applies to groundwater analysis.

General Comment 3: Section 3.1.3, Page 22: The last sentence in this paragraph states the greatest density of coarse grained sediment is located in Site 8. It would be helpful to delineate Site 8 on Figure 3.

Navy Response: The Site numbers 1, 8 and 12 have been identified in Figure 1. We have added a reference to this figure in the last sentence of Paragraph 3.1.3. Figure 3 is crowded, by adding site identification we believe the figure would be too cluttered.

General Comment 4: Section 3.2.8, Page 32: The text states that the highest values from the southwestern area for trichlorofluoro-methane was at CPT -11 (3.8 μ g/L). However, according to Table 1 and the Appendix, the highest values of Trichlorofluoromethane were found at CPT-6 at 31 μ g/L (HPNB-37) and 30 μ g/L (HPNB-56).

Navy Response: The text has been changed to read "These four samples were collected from the southwestern area of the study site and the highest value is at CPT-6 (31 μ g/L)."

General Comment 5: Section 5.1, Page 37: The first sentence states the data do not suggest a source. However, CPT-14 has 11 μ g/L of 1,1-DCA, 20 μ g/L of 1,1-DCE, 29 μ g/L of trans 1,2-DCE, 24 μ g/L of 1,1,1-TCA and 49 μ g/L of TCE. This

point appears anomalous when compared with points adjacent to it. The significance of the findings at CPT-14 should be discussed in the text.

Navy Response: To suggest that CPT-14 is a source for the reasons mentioned, we must also address CPT-39 (1,1-DCA), CPT-47 (1,1-DCA, 1,2-DCE) and MW-6 (TCE) to maintain consistency. Rather than inferring sources at each of these locations, we believe the nature of contamination in groundwater is effected by the heterogeneous lithology and that areas of elevated concentration may be hydraulically connected to the regional plume by permeable channels.

General Comment 6: Section 5.2, Page 37, second paragraph: Several compounds (1,1-DCA, 1-2 DCE, TCE and PCE) appear to have migrated into the wetlands area northwest of NAS Moffett property.

Navy Response: Before recommendations can be made concerning protection of the wetlands, the extent of contamination should be better understood. The Navy is preparing a work plan for studies designed to better define vertical and horizontal limits of contamination in the North Base Area. Plans for a separate work plan describing a horizontal conduit study are underway. This will begin after the extent of contamination is better understood.

Editorial Comments: Each editorial comment has been addressed and the proper changes have been made.