

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2  
700 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737



May 19, 1992

(510) 540-3724

RECEIVED  
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QUALITY CONTROL BOARD

Elizabeth Adams  
San Francisco Region  
Regional Water Quality Control Board  
2101 Webster Street, Suite 500  
Oakland California 94612

**MOFFETT FIELD OU-2 REMEDIAL INVESTIGATION**

Dear Ms. Adams:

The Department of Toxic Substances Control (Department) is forwarding the enclosed comments on the above report for your consideration. The Risk Assessment comments will be provided to you in a separate letter.

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

Sincerely,

Cyrus Shabahari  
Waste Management Engineer  
Site mitigation Branch

Enclosure

1405

D/R 3



**SPECIFIC COMMENTS:**

1. Page 1-7, paragraph 2,
  - a. More information is needed on the two open vertical pipes. It is possible that they could contaminate the lower aquifer.
  - b. If there is no evidence of fuel on top of the groundwater, what do you think happened?
  - c. When the NEESA study was done? Was this report submitted to the agencies for review? Were the data validated? The Department has no copy in the file.
2. Page 2-18, last paragraph, are tanks 19 and 20 in place? Please provide more information on their conditions.
3. Page 3-7, paragraph 2, Hetch-Hetchy background level does not show any number for Aluminum.
4. Page 4-1, paragraph 2, the sources to the vapor plume are unknown. There was no explanation for a lack of any investigation. There must be a contour map of the metal contamination. There is no physical description of the lateral and vertical contamination.
5. From table 5-2-2 it seems that between 4 to 5.5 feet deep is the most contaminated zone.
6. Page 4-3, paragraph 2, this section is about the extent of the contamination; however, the vertical extent of contamination has been undermined because samples were collected only from the shallow aquifer. The site characterization is therefore, incomplete. Please explain the Phase II activities.
7. Page 6-1,
  - a. Paragraph 3, the PCE data are missing.
  - b. Paragraph 4, there is no contour map for the plume. Please provide information on tanks eight (8) and nine (9).
8. Page 7-1, paragraph 1, was the site paved at the time of disposal? If not, underneath of the paved area could be contaminated. This uncertainty must be investigated. Contaminated sites must be investigated regardless of their physical properties.
9. Page 7-2, paragraph 4, the site characterization is incomplete because the lateral extent has not been investigated.

10. Page 8-1, last paragraph, the presence of Bis(2-ethylexyle) indicates a plume or a source in perimeter or under Hanger 1. The downgradient sample is almost zero.
11. Page 8-2, paragraph 1, again the areal extent of bis(2-ethylhexyle)phthalate contamination has not been determined.
12. Page 8-3, if the metals are above the background levels why are they dropped from the feasibility study? If metals, VOCs and others are not the problem, then what happened to 600,000 gallons of discharged waste? Where did it go?
  - a. Paragraph 3, the baseline changes from USGS to Whaler. Explain which one you choose. What is the downgradient reading? {MW 7-20(A1)}
13. Page 8-4, paragraph 1, we still have high level of copper in the soil (20,500 ppm). No mitigation measures were recommended. Please explain why.
14. Page 10-6, paragraph 1, Department can not agree with the conclusion. MEW plume in the A2 aquifer does not seem to have affected the top five (5) feet of the soil. More information is needed to confidently assess the soil contamination at site nine (9).
15. Page 20-4, top paragraph, please explain and provide reference to support the assertion that 1400 ppm of TPH does not pose any risk to humans or the environment.
16. Page 20-17, paragraph 1, site 11 data show lead to be high, thus, should be added to the potential chemicals of concern.
17. Page 20-21, paragraph 2, the Department does not agree with the conclusion that the majority of the metals are related to the natural background.
18. Page 21-4, paragraph 1, the Methylene chloride in the soil must be mitigated to prevent leaching into the groundwater. The chemicals present in the soil do present unacceptable risk to human and environmental receptors.

**GENERAL COMMENTS:**

The background levels have not been established yet. The agencies never participated in a discussion to agree on the background levels. It is therefore, premature to drop some sites or delete some metals from remediation on the basis of background levels. Moreover, background levels MUST be site specific. USGS nation-wide background levels are not acceptable.

There are no discussions on background levels and how they have been established. There were no reference to any superfund sites in the area if they are using these background numbers. There is no discussion on the methodology, since there are four sets of values which have been used.

Most sites have not been fully characterized. Either the source is not known or the extent of the contamination is unclear. Thereby, any decision on their exclusion from the feasibility study could not be made confidently at this time

Some data have "R" qualifier. There is no discussion on why these data were rejected. The text did not provide any information on the rejected data.

Even though site nine (9) has metal contaminations it is recommended for possible Methyl chloride and acetone and TCE mitigation. Building 29 investigation results must be included in the report. The problem of contaminants leaching into the groundwater has not been addressed. This could exacerbate the groundwater contamination at later time. The absence of any discussion on the leaching has been observed throughout the report. Some localized contamination has not been addressed hence, no mitigation measures.