

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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Mr. Stephen Chao
WestDiv Engineer in Charge
Department of the Navy
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Bldg. 101
San Bruno, CA 94066-0720

July 15, 1992
File No. 2189.8009 [EA]

Subject: Comments on the RI\FS Quality Assurance Project Plan Draft Final, dated April 1992.

Dear Mr. Chao:

The following comments are based on the San Francisco Bay Regional Water Quality Control Board staff's review of the RI\FS Quality Assurance Project Plan Draft Final.

In general, the Regional Water Quality Control Board concurs with the Quality Assurance Project Plan Draft Final document. However, there is one section which requires clarification and one general comment on ARARS. One page 15, the discussion of ARARS does not specifically list any of the State regulations or policies which could be utilized as an ARAR for the site. The text could include some of the State's promulgated guidelines which can be adopted as ARARS. For information purposes, these include the Water Quality Objectives stated in the Water Quality Control Plan for the San Francisco Bay Region, Title 23 of the California Code of Regulations, Division 3, Chapter 15, article 5 which states water quality protection standards for corrective actions, the State Board Resolution No. 92-49 which establishes policies for cleanup activities resulting from discharges of hazardous waste, the Safe Drinking and Toxic Enforcement Act of 1986 (Proposition 65) as well as several others. Though these do not need to be included in the text, they should be recognized as potential ARARS for the sites at Moffett Field.

Specifically, on page 41, paragraph 2: The text states that "the SAS method will provide detection limits that generally meet ARARS." Please clarify this statement by describing which ARARS the detection limits are being compared to in the text, and by listing the constituents where the detection limits will not meet those ARARS.

If you have any questions or concerns please contact me at the San Francisco Bay Regional Water Quality Control Board at (510) 464-3980.

Sincerely,

Elizabeth Adams
Project Manager

cc: Mr. Cyrus Shabahari, DTSC

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