N00296.001564
MOFFETT FIELD
SSIC NO. 5090.3

STATE OF CALIFORNIA

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612

Phone: (510) 464-1255
FAX: (510) 464-1380

# FACSIMILE COVER SHEET

To: Stephen Chao

Fax Number 415-244-2553

From: Elizabeth Adams Phone No. 510·286·3980

Subject: Comments on OU 1 RI

Total pages including cover sheet: 4

If you are having any problems receiving this, please call sender.

Comments:

SENT FAX COPY OF THESE COMMENTS TO Keith Bradley today also.

EA

1564

STATE OF CALIFORNIA PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612

Phone: (510) 286-1255
Fax: (510) 286-1380

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

December 30, 1992
File No. 2189.8009

Subject: Comments on the Draft Remedial Investigation Report Operable Unit 1, Landfill Sites 1 and 2, November 1992

Dear Mr. Chao:

The following comments are based on the San Francisco Bay Regional Water Quality Control Board Staff's review of the Draft Remedial Investigation Report Operable Unit 1, Landfill Sites 1 and 2, November 1992.

General Comments:

Why isn't the data from the recent investigations at the Golf Course Landfill included in this report? It seems that further investigations of the area and the interpretation of the risk associated with the data derived from the recent field investigations should be included in the OU1 feasibility study. Please clarify the reasoning behind including recent data from the Golf Course Landfill area within OU2 instead of OU1.

Please explain why the data from the ESA soil borings and monitoring wells is not included in this report.

The labeling of the monitoring wells within the text does not correlate with the labeling of the wells on Figures 4.1-2 and 2.3-11. The W02 or W01 label is used in the text and the figures use only W2, and sometimes W1 or W01.

Specific Comments:

pg. 1-8, section 1.5.1 Is this area still ever used as a pistol range?

pg. 1-11 What is the source of the TCE which was found in the soils which are described as "clean fill" for the areas surrounding the site 2 landfill?

pg.2-4, section 2.1 Was this SWAT report sent to the Regional Water Quality Control Board? If there is documentation which shows the submittal date, please include this in

the report.

pg. 2-7, sec. 2.2 It seems as though the data from the recent investigations at the Golf Course landfill should be included in the OU1 RI or FS. Please clarify the reasons that this information is being included in the OU2 FS.

pg. 2-9, last paragraph The landfill is located farther to the northeast, not the northwest.

pg. 3-16, section 3.8 The San Francisco forktail damselfly needs to be included in the list of endangered, threatened and rare species in both this section and section 7.3.1.3.

pg. 6-2, section 6.2 It is not unusual to find isolated pockets of contamination within a landfill. These contamination areas should not be downplayed just because the "persistence" of these contaminants may be limited.

pg. 6-4, par. 3 Site 1 in the first sentence should be replaced by site 2.

pg. 6-12, par. 5 The first sentence of the description of xylene contamination at site 2 should state that total xylenes were found in subsurface soils [samples at W02-09 (A1)].

pg. 6-16 With only three wells, and limited soil borings at site 2 it is inappropriate to rely heavily on arguments which label a contaminant "not persistent" when it is consistently detected in one of the wells. These sections which describe the persistence of contaminants are included for what purpose, and what guidelines are being used to label a contaminant persistent or not persistent? In general these sections seem as though they are a value judgement and that the data should be presented without these interpretations.

pg. 6-18, par. 1 Please further explain why the PCB contamination at site 2 seems more extensive even though the highest concentrations, 18,000 ppb of PCB's were found at site 1.

pg. 7-21, par. 2 It is important to state that the clay intervals which underlie both landfills are part of the "interfingering" of fine and course-grained materials and that the limited subsurface data can not prove a consistent clay layer below the fill materials.

pg. 7-21, par. 4 The description of the downward migration into the A-1 aquifer zone needs to be included in the Hydrology section in chapter 3.

pg. 7-25, section 7.3.2 The re-use scenario which assumes that the upkeep on dikes and the drainage of the area would be discontinued, and the assumption that the wetland hydrology would be re-established is inappropriate. There is no reason to believe that the present hydraulic controls won't continue. There is no law which would force these areas to become wetlands and the private salt flats surrounding the area will continue to prohibit the area from returning to its natural state. The area may potentially be "real estate with a view" in fifty years.

pg. 7-26, sec. 7.3.3 Please include the laboratory results for the wells at site 1 and site 2 which show the levels of total dissolved solids.

pg. 8-3, Fate and Transport The statement which assumes that if contaminants were going to migrate they would have already done so in the last 15 years does not take into account that geochemical conditions within the landfills could change to facilitate the mobility of these compounds, or that they will eventually migrate in the next fifty years.

Figure 4.1-2 There should not be any distinction made between aquifer water levels and leachate water levels within the fill material. All fluids within the landfill boundaries should be labeled leachate.

If you have any questions or concerns, please call me at the San Francisco Bay Regional Water Quality Control Board at (510) 286-3980.

Sincerely,

Elizabeth J. Adams

Elizabeth J. Adams
Project Manager

cc: Roberta Blank, US EPA
Mail Stop H-9-2

Cyrus Shabahari, DTSC