



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

N00296.001576
MOFFETT FIELD
SSIC NO. 5090.3

January 29, 1993

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

Dear Mr. Chao:

The U.S. Environmental Protection Agency has reviewed the Response to EPA Technical Comments on the OU-2 RI Report, dated January 5, 1992. Comments on this response, prepared by our representative, SAIC, Inc., are enclosed. Our resolution of the OU 2 dispute is pending our review of the Navy's responses to our comments on the baseline risk assessment portion of the OU 2 RI, and your response to the enclosed comments. (Please note that SAIC's reference in the enclosed letter to Sump 91 should refer to the RD/RA for site 18, rather than the risk assessment and feasibility study for that site, due to our restructuring of the OU's.)

Please call me at (415) 744-2385 if you have any questions regarding these comments.

Sincerely,

Roberta Blank

Roberta Blank
Remedial Project Manager

cc: Cyrus Shabahari, DTSC
Elizabeth Adams, RWQCB

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Technology Services Company

January 20, 1993

DCN: TZ4-C09015-RN-M15940

Ms. Roberta Blank (H-9-2)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Ref: EPA Contract No. 68-W9-0008; EPA Work Assignment No. C09015
SAIC/TSC Project No. 06-0794-03-0630
Final Remedial Investigation Report, Operable Unit 2:
Sites 3-11, 13, 14, 16-19 Soils

Dear Roberta:

SAIC/TSC has completed its technical review of the referenced document. The review was based on the response to comments on the Draft Final Remedial Investigation (RI) Report for Operable Unit 2 (OU2), provided by International Technology Corporation (IT) in their transmittal of January 5, 1993. This review was performed by SAIC/TSC geologist Richard Brown and addresses only the non-baseline risk assessment issues. The Response to Comments on the baseline risk assessment portion of the Final RI Report are scheduled for a January 27, 1993 agency submittal.

The following concerns SAIC/TSC had expressed over the Draft Final RI Report were not suitably addressed.

1. SAIC/TSC has also recently completed its review of the *Draft Additional Tank and Sump Field Investigation Technical Memorandum*. One of the conclusions from that review was that Sump 91 (in Site 18) does appear to be a source of contamination for 1,2-dichloroethene (DCE) and trichloroethene (TCE). The maximum concentrations of 88 $\mu\text{g}/\text{kg}$ for 1,2-DCE and 550 $\mu\text{g}/\text{kg}$ for TCE, obtained May 29, 1992, from SBS91-1 (W91-1{A1}), would result in equilibrium groundwater concentrations above their respective maximum contaminant levels (MCLs). This conclusion is further supported by the groundwater concentration contour maps from OU4. These maps show additional sources of groundwater contamination from 1,2-DCE and TCE, as well as from tetrachloroethene (PCE), on the north side of Building 88.

SAIC/TSC believes that Sump 91 should be considered a source of contamination for volatile organic compounds (VOCs), and should, therefore, be included in the baseline risk assessment (BRA) and the feasibility study (FS) for Site 18 of OU2. Any VOC contamination



remaining in the vadose zone in and around Sump 91 will continue to leach into the groundwater. IT's summary of PRC's data was somewhat inaccurate and misleading in concluding that soils contamination from the Sump 91 contents would not impact the groundwater significantly. Results from applying the Summers Model to concentrations of 1,2-DCE and TCE in the soils, using the actual 10-foot aquifer thickness, indicate that leached groundwater concentrations of these components would exceed their present MCLs.

2. Samples from the removal of Tank 53 (Site 19) were also discussed in the report mentioned above. SAIC/TSC agrees that additional sampling will be required to determine the extent of contamination to the soils around the area of the tank removal. Significant soil contamination from benzene, toluene, ethyl benzene, and xylenes (BTEXs) should be remediated before leaching into groundwater occurs.
3. Appendix A does not contain analytical data from soil samples taken from the one to two and one-half foot intervals during installation of monitoring well W14-05(A2). These data should be provided.

If there are any questions concerning these comments, please call me at (415) 399-0140.

Sincerely,

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
Technology Services Company

A handwritten signature in cursive script that reads "Fred Molloy".

Fred Molloy
Work Assignment Manager

Enclosures