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Ser 1813CG/L3196
February 19, 1993

Mr. Patrick Hogan
Safety, Health, and Medical Services Office
NASA Ames Research Center
Ames Research Center
Moffett Field, CA. 94035

Subj: NAS Moffett Field Remedial Investigation/Feasibility Study NASA Comments
on Additional Sites Investigation Report

Dear Mr. Hogan:

Western Division, Naval Facilities Engineering Command, and our consultants PRC Environmental Management, Inc. (PRC) and James M. Montgomery, Inc. (Montgomery) have reviewed NASA's comments of January 13, 1993 and have the following responses to the comments:

Comment

Section 1.4.1 Zook Road Fuel Spill Site, Page 6, Paragraph one, first sentence.

"These tanks, allegedly located just north of the present fire station and south of Bravo Taxiway, were not observed during the aerial photograph search. NASA has submitted photographs to the Navy which depict what we interpret as two above ground tanks. These can be seen in an expanded view of the NASA 1967 photo A-38286-22.

Response

The referenced NASA photograph does show two aboveground storage tanks adjacent to the former fire station south of the NASA Taxiway. These two tanks appear to have approximate capacities of 500 gallons. This storage volume is not considered to be enough to account for the large volumes of spilled fuel suggested by Mr. Ralph Helmer.

Comment

Section 1.4.1 Zook Road Fuel Spill Site, Page 6, paragraph two, last sentence.

"It is not known at this time if the TPH contamination associated with the NASA Fuel Farm has commingled with TPH contamination associated with Site 12". Site 12 is over one thousand feet north of NASA's fuel farm. Since the release that originated at the NASA fuel farm occurred recently, May 9, 1992, it is improbable that this event made any contribution to the TPH contamination identified at Site 12. It is also unlikely to have any future impact to Site 12 due to the source control measures implemented by NASA at the Fuel Farm location immediately

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following the release. Within approximately one week of the tank overflow, NASA had installed three recovery wells that initiated water table drawdown and product recovery at that location. Of the approximately 2,500 gallons released from the single overflow event, almost 1,500 gallons have been recovered. This suggests that the rapid response to the release and the water table drawdown induced by the recovery program have minimized migration of fuel constituents from the immediate vicinity of the release. A report describing the event, the associated activities, and all analytical results is currently being prepared. The Navy, and all appropriate regulatory agencies will receive copies as soon as it is completed, planned for January 1993.

Response

The NASA data presented in Figures 4, 5, and 6 are contaminant concentration information supplied by NASA to the Navy and the Navy's consultants in 1990 and 1991 reports by Reidel Environmental Services. At no time, was there any reference within the Additional Sites report to the NASA fuel spill of May 9, 1992. Nor was there any relationship suggested between the soil contamination at Site 12 and the operation of the NASA fuel farm. In fact, the NASA fuel spill had not occurred at the time of the Site 12 or Zook Road fuel spill investigations, and was not considered during the analysis of the data or the preparation of their respective reports.

The data on Figures 4, 5, and 6 are intended to illustrate that fuel contamination was present in the area of the NASA fuel farm as long ago as 1990. Figures 4 and 5 clearly indicate that higher concentrations of fuel contaminants were reported in soil samples collected from comparable depths from borings located hydraulically downgradient of the NASA fuel farm (B14) than were present in samples from soil borings located upgradient (B8) of the NASA fuel farm. These data suggest that fuel spills may have occurred prior to the 1990 and 1991 Reidel investigations at the NASA fuel farm.

This information serves as the technical basis for the Navy's recommendation to install a water table monitoring well upgradient of the Zook Road fuel spill site.

Comment

Section 5.0 Conclusions and Recommendations, page 34, Patrol Road Ditch Site.

The Patrol Road Ditch Site is habitat for the San Francisco fork-tailed damselfly, a potentially endangered species listed as a category 2 with the U.S. Fish and Wildlife Office of Endangered Species. Dr. John Hafernik (415) 338-1549, a professor at San Francisco State University, has more specific information. An evaluation of the impact to this species, which may involve further sampling, should be conducted.

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Response

The recommendation within Section 5.0 stated that additional confirmatory sampling was to be conducted to determine if the contamination detected in the soil samples and discussed in the report are from actual soil contamination or from laboratory contamination. The confirmatory sampling as well as data to be collected during the Navy's Site Wide Ecological Assessment (SWEA) will allow the determination and evaluation of the possible risk to the indigenous biota present within the ditch.

We trust that these responses will clarify the Navy's position. If you have any further questions or comments, please feel free to contact Mr. Stephen Chao at (415) 244-2563.

Sincerely,

Original signed by:

Gilbert Rivera
Head, Installation Restoration Section B

Blind copy to:

~~181, 1813, 1813SC, 1813CG, Admin. Record (w/2 copies)~~
NAS Moffett Field (Code 189, LT Openshaw)
PRC Environmental Management, Inc. (Attn: Josh Marvil)
JMM James M. Montgomery, Inc. (Attn: Joseph LeClaire)
file: MOFFETT/MON RPT
Chron, blue, pink, green