

STATE OF CALIFORNIA

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

101 WEBSTER STREET, SUITE 500

OAKLAND, CA 94612

(510) 286-1255



Mr. Stephen Chao
WestDiv Engineer in Charge
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Bldg. 101⁴
San Bruno, CA 94066-0720

November 17, 1993
File No. 2189.8009

**Subject: Comments on the final Installation Restoration Program
Petroleum Sites (and Wastewater Tanks and Sumps) Characterization
Report, October 1993**

Dear Mr. Chao:

The following comments are based on the San Francisco Bay Regional Water Quality Control Board (RWQCB) staff's review of the subject document.

General Comments:

RWQCB staff was pleased to see that several of the comments from the draft version of this document were incorporated into the text. However there are some clarifications of State guidelines which still need to be incorporated into the text. Throughout the text, visual inspection of the sumps or tanks is outlined as the first procedure to determine whether or not a release has occurred and if further soil and groundwater investigation of the site is necessary. This methodology is not consistent with the requirements for tank investigations outlined in the Tri-Regional Guidelines. Page six of the Tri-Regional Guidelines states:

When any underground storage tank is removed, whether for permanent site closure or tank replacement, the responsible party is to demonstrate that no authorized release from the tank has occurred. At a minimum a visual inspection of the tank system, and soil samples (and groundwater samples when appropriate) are required."

The addition of soil samples, as well as visual inspections should be included int the text to determine if a release has occurred.

The reason for including groundwater elevation data is to aid in evaluating the analytical data over seasons. Though the seasonal high water table level was included on the tables in the text, it would have been helpful to include the date of the water level measurement in order to compare it to the groundwater sampling events and the analytical results.

The text states that Site 12 groundwater is being addressed through the CERCLA response action within the regional plume, however the CERCLA source remediation projects are within the Site 9 area and

1953

will not affect Site 12. Any groundwater analytical data available for Site 12 should be included in this document. The contaminants of concern at the site are petroleum-related, and the recent excavation showed that the contamination at the site was far more extensive than originally estimated. The excavation was completed down to groundwater which indicates that there is the potential for groundwater to be contaminated at the site. If there is not sufficient groundwater data for Site 12 currently, then further investigations should be included in the future work plans for the petroleum sites. RWQCB staff does not concur with the Navy's conclusions that no further action is warranted at Site 12.

Active oil/water separators and sumps can not be recommended for closure. For proper closure these units would need to be taken out of service, inspected for leaks or cracks and soil samples would need to be collected to verify that the site is clean. If soil contamination is present, the site would need to be remediated before closure could occur. RWQCB staff recommends that a visual inspection and soils sampling, at a minimum, be conducted at the active sites to verify that the unit is functioning properly and is not releasing contaminants to the environment. If contamination is present, then the site should be recommended for corrective action and the unit be replaced.

Specific Comments:

pg. ES-2, par. 3 Inspections and soil sampling is required before the sumps and oil/water separators can be approved for closure.

pg. 2, section 1.1 It is unclear how the Navy intends to handle some of the sumps that historically may have handled wastewater. Are these sites going to continue to be evaluated in these documents? Are there residual contaminants from the sumps which are not petroleum-related? If only petroleum-related constituents remain in the soil or groundwater it seems more appropriate to address these sites within the current format. In general, please clarify this section.

pg. 3, par. 1 Groundwater at Site 12, though it is within the western portion of Moffett Field, will not be affected by the current remedial designs under the CERCLA process. Site 12 should be addressed by the petroleum documents.

pg. 3, par. 3 Groundwater contamination from Site 15 sumps and tanks was not adequately addressed in the OU5 RI/FS process, and it was understood that these tanks and sumps would be further evaluated within the petroleum documents. It was with this understanding that the agencies reserved comment on the data presentation for most of the Site 15 tanks and sumps within the OU5 RI. It is inappropriate to now reverse course and state that potential groundwater contamination from these sites will not be addressed by the petroleum documents. This document recommends further inspections and investigation of Site 15 tanks and sumps and should address the potential groundwater contamination

associated with the site.

pg. 10, Tanks Soil samples collected from well W05-09 are not adequate representations of the soils surrounding tank 18 since the well is approximately 48 feet away from the tank. Any conclusions regarding closure of tank 18 should be delayed until its removal and collection of soil samples have been completed.

pg. 18, Table 3 Please include wells W05-21, W05-23, and W05-27 on this table. These wells are used within the text to characterize contaminant levels at specific tank sites, however their distances from the tanks and screened intervals are not known.

pg. 40, section 2.3 As stated previously, RWQCB staff does not concur with the conclusions that the petroleum documents should not further evaluate the soil and groundwater contamination at Site 12.

pg.43, Sump 64 This sump may be a potential vertical conduit to the shallow groundwater for contaminants in surface run-off. RWQCB staff have visually inspected the former stormwater diversion box and we recommend that it be removed.

pg. 44, section 2.4.1 Soil samples and visual inspections are the minimum requirements (if groundwater is not present in the excavation) for our agency to evaluate whether a release has occurred. If groundwater is present at the bottom of the excavation, then groundwater samples must be collected and analyzed for potential contaminants.

pg. 50, Table 10 Sump 58 and Sump 59 are oil/water separators. The contents of the sump should have been sampled for TPH and oil and grease as well as BTEX constituents.

pg. 52, section 2.5.1 Was groundwater present at the bottom of the Tank 2 excavation? Please include this information if available.

pg. 57, Tank 14 the motor oil contamination present in the soils needs to be addressed in the text.

Tank 43 The statement "no samples...contained significant concentrations of VOCs or SVOCs and metals values were within reported ranges for NAS Moffett Field" is not acceptable. Please state the concentrations of these compounds, instead of simply qualifiers to describe the concentration. What is meant by within the "reported ranges" for metals analyses? Please state the levels of metals detected at the site.

pg. 65, section 3.0 and pg. 72, par 1 Soil samples must be taken in addition to visual inspections to determine whether a release has occurred.

pg. 70, Groundwater Wells W05-25 and W05-23 had TPH detected during the December 1992 sampling event (Table 4), however the text states here that no TPH constituents were detected.

pg. 71, Soil Active sources at Site 9 include all the contaminated soils that were backfilled into the excavations.

Section 3.3 As stated earlier, RWQCB staff does not concur with the recommendation for no further evaluation or action at Site 12.

Section 3.4 If soil analyses from the tank and sump sites at Site 15 show that there is a potential for groundwater contamination, or analyses from groundwater present at the bottom of excavations demonstrates that contamination is present, then these petroleum reports should address the contamination since the RI for OU5 is already completed.

pg. 73, par 1 Table 10 shows that at Sump 59 no TPH analyses were performed yet the text states here that analysis indicated that petroleum-related compounds were not present. This statement is misleading and should be revised since TPH and oil and grease were not even analyzed for, and no soil samples surrounding the oil/water separator were collected.

Sump 63 needs to be re-routed to the sanitary sewer if continued use of the sump is planned for the future. It is currently being routed to the wastewater flux pond which will be closed in January 1994.

Sump 42 The monitoring well used to determine if there has been impact to the groundwater from Sump 42 is too far away to adequately represent potential impact from the sump. Either "hydropunch" samples or another means of investigation will need to be conducted to gain closure for this sump.

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
Project Manager

cc: Michael Gill, US EPA
Mail Stop H-9-2

C. Joseph Chou, DTSC