

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

SECTION 2  
700 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737

(510) 540-2122



February 15, 1994

Commander  
Western Division  
Naval Facilities Engineering Command  
Attn: Mr. Stephen Chao, Project Manager  
900 Commodore Drive, Bldg. 101  
San Bruno, California 94066-2402

Dear Mr. Chao:

**DRAFT BRAC CLEANUP PLAN, NAVAL AIR STATION MOFFETT FIELD, NAVAL  
AUXILIARY LANDING FIELD (NALF) CROWS LANDING, CALIFORNIA**

The State, the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB), has reviewed the subject document and forwarding the following comments for your consideration.

**GENERAL COMMENTS**

1. The text seems to indicate that the NALF Crows Landing, as an annex property of NAS Moffett Field, is under the same Installation Restoration Program. However, the current Moffett project team has not addressed environmental activities at Crows Landing, the Navy needs to clarify the regulatory oversight and the project team which will be involved in the cleanup at NALF Crows Landing in this document.
2. Only three sites at Moffett Field have total dissolved solids (TDS) levels in the groundwater above State requirements for potential drinking water. The text should be revised to reflect the beneficial uses of the groundwater at the site.
3. The text and tables need to include the additional endangered species observed at NAS Moffett Field, the clapper rail and the San Francisco forktail damselfly.
4. Text needs to be revised to accurately describe the current status of soil and groundwater inorganic background levels for the project. The Navy and regulatory agencies have accepted and established inorganic background levels which have been utilized for four Remedial Investigation reports and three Risk Assessments.

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5. A detailed funding requirements of IRP activities, and compliance programs by fiscal year should be included in the BCP for regulators review.
6. The State suggests replacing current subsection of "problems impeding progress" and "minor problems" in Section 6 by "Rationale" and "Status/Strategy" to address any technical and other issues need to be resolved. It should be noted in the text that quite a few statements made in those sections only represent Navy's points which have not been concurred by the BCT or project team.

#### SPECIFIC COMMENTS

1. Page 1-1, 2nd Paragraph

The statement that "the BCP results from a comprehensive program review conducted by the BRAC Cleanup Team (BCT)" failed to reflect the current situation of NAS Moffett Field BCT. The State of California had requested the Navy that a bottom-up review should be performed by the BCT, the BCT members should have the opportunity to review the BCP at earlier stage. However, no documents were sent to the State or the U.S. Environmental Protection Agency (U.S.EPA) prior to the release of draft BCP.

2. Page 1-1, 2nd Paragraph

Please note that the Federal Facility Agreement (FFA) of NAS Moffett Field were signed between the Navy, U.S. EPA, the DTSC and the RWQCB.

3. Page 1-2, 1st Paragraph

Please discuss how often the BCP will be updated and the process for updating and approval.

4. Page 1-5, Table 1-1

A separate BCT/project team table for NALF Crows Landing should be used to prevent unnecessary confusion.

5. Page 1-12, Table 1-3

If data available, the historical and current hazardous wastes generating activities should be included in this table, not only for fiscal year 1992.

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6. Page 1-12, Table 1-3

A separate column of "Waste Disposition" should be added to this table to describe how those waste were disposed.

7. Page 3-18, Table 3-4

Please clarify if any immediate removal will be necessary for those building found with asbestos containing materials.

8. Page 3-62, 3rd Paragraph

In the Remedial Project Managers (RPM) meeting on Feb. 1, 1994, the Navy RPM addressed that a Restoration Advisory Board (RAB) will replace the current Technical Review Committee (TRC) for NAS Moffett Field.

9. Page 5-1, 4th Paragraph

Please See General Comments No. 5.

10. Page 5-2, Table 5-1

Site Wide Ecological Assessment (SWEA) activities should be included in this table.

11. Page 6-6, 3rd Paragraph

The agencies have agreed upon using the background levels which have been proposed by the Navy and were applied to previous investigations. Therefore, it is unnecessary to establish any "new background levels" through the elaborate on-site statistical analysis. The time consuming and costly analysis may not provide accurate background information because it is extremely difficult to find areas not influenced or not potentially influenced by the site. To avoid delays of remedial activities at the NAS Moffett Field, it is suggested that any issues of new background levels for inorganics should not be included in project team's schedule.

12. Page 6-17, Section 6.14.1

Please note that no regulatory agencies have been involved in the technical advisory review panel(TARP).

Mr. Stephen Chao, Project Manager  
February 15, 1994  
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If you have any questions, please call me at (510) 540-3830.

Sincerely,



C. Joseph Chou  
Engineering Geologist  
Site Mitigation Branch

Enclosures

cc: Ms. Elizabeth Adams  
Regional Water Quality Control Board  
2101 Webster Street, Suite 500  
Oakland, California 94612

Mr. Michael D. Gill  
U.S. Environmental Protection Agency  
Region IX, Mail Stop H-9-2  
75 Hawthorne Street  
San Francisco, California 94105

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**  
*San Francisco Bay Region*

**Internal memo**

TO: Ron Gervason  
FROM: Elizabeth Adams (510) 286-3980  
DATE: February 4, 1994

SUBJECT: Comments on Naval Air Station Moffett Field Naval Auxiliary Landing Field Crows Landing, California, January 28, 1994.

These comments are based on the San Francisco Bay Regional Water Quality Control Board staff's review of the subject document.

General Comments:

Statements throughout the text seem to indicate that NALF Crows Landing, as an annex property of Moffett NAS, is included within the Installation Restoration Program (IRP) program at Moffett Field and will follow the CERCLA process, even though it has not been included in a Federal Facility Agreement (FFA). If this is truly the situation then environmental compliance activities, investigations and remedial activities should be included within the current Moffett CERCLA process. The text does not state what regulatory agencies are overseeing the environmental activities at NALF Crows Landing. If the site is property of Moffett Field then activities should be coordinated under the existing project team, unless a more appropriate oversight designation applies. In any case, it seems that more coordination between clean up activities at the sites will need to be included in the responsibilities of the BRAC clean up team.

Specific Comments:

1. pg. 1-5, Table 1-1 Any regulators currently involved in overseeing the environmental investigations at Crows Landing should be included in this table.
2. pg. 1-12, section 1.4.1.2 Only three sites at Moffett NAS, sites 1,2, and 11 contain groundwater with levels of total dissolved solids above levels designated in State Board Resolution 88-63, "Sources of Drinking Water". Therefore, the majority of the groundwater at Moffett NAS does meet the standards for potential drinking water. Other beneficial uses for the groundwater at Moffett NAS include agricultural use and surface water recharge. Please revise the statement that there are no beneficial uses for the groundwater at the site to reflect these uses.
3. pg. 3-2, Table 3-1 Risk levels for many of the sites have been determined and agreed upon by all agencies in Remedial Investigation (RI) reports for operable unit (OU) 1, OU2, and OU5. This table should refer to the RIs for information or reflect the status of the

risks which have been determined.

4. pg. 3-10, section 3.1.1.2 Please elaborate on how the sites at NALF Crows Landing will be designated as IRP sites within Moffett's program.

5. pg. 3-13, section 3.1.2.2 Is U.S. EPA currently involved with investigations at NAFL Crows Landing?

6. pg. 3-17, section 3.2.1.1 This paragraph is very confusing. U.S. EPA is no longer reviewing the State of California's RCRA underground storage tank (UST) program. EPA has approved the implementation of RCRA by the Department of Toxic Substance Control. The State underground storage tank regulatory program, under State of California Health and Safety Code, is currently implemented by the Regional Water Quality Control Board.

7. pg. 3-51, section 3.3.1 Other endangered species which have been observed on Moffett NAS are the clapper rail and the San Francisco forktail damselfly. These species need to be added to this section. Section 3.3.4 needs to include the Navy channel, the golf course ponds and the Northern channel as surface water bodies on Moffett Field.

8. pg. 3-53, Table 3-12 This table needs to be revised to include the additional endangered species mentioned in the above comment #7.

9. pg. 3-63 Is there a Restoration Advisory Board for NAFL Crows Landing?

10. pg. 4-5 The Basewide RI/FS process should be included in the Non-MEW schedules. Site 22 soils and groundwater will be included under the Basewide activities, and are not part of OU1 as it states in this section.

11. pg. 6-2, section 6-1 Since this document is a management tool, the need to evaluate data which was analyzed at Eureka Laboratories should be included as a minor problem under this data section.

12. pg. 6-6, section 6.4.1 The text does not accurately reflect the status of soil and groundwater inorganic background levels. The text should state that presently the project does have established background levels which have been proposed by the Navy, accepted by the regulatory agencies, and have been used in four RI reports and three risk assessments.

13. pg. 6-10, Table 6-1 Under the risks portion of this table for OU5, it should state no current risks to human health.

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

## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

2101 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. 101  
San Bruno, Ca 94066-0720

February 7, 1994  
File No. 2189.8009

Subject: Comments on the Revised Field Work Plan for Site Remedial Investigation of the Naval Exchange Service Station, January 14, 1994

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.

1. The text does not include the proposed locations for the monitoring wells that will be installed during this field effort. Our agency understands that final placement of the monitoring wells will depend on the analytical results of the CPT soil samples. Final placement of the monitoring wells must be coordinated with RWQCB staff before installation.
2. The text states that only the A1 aquifer will be sampled during this field effort. In order to fully characterize the site the Navy will need to investigate and monitor the A2 aquifer to determine whether fuel constituents are present. Final closure of the site will require the verification that contaminants associated with the naval exchange service station are not present in the A2 aquifer.
3. The text states that only 10% of the groundwater samples will be split and sent to a California certified laboratory. It is unclear how many groundwater samples will be taken during this field effort, but it seems that the number will be minimal. RWQCB staff question the ability to correlate values with such a small percentage of split samples. On site analysis is acceptable for screening purposes, but all groundwater samples from the installed monitoring wells must be sent to a certified laboratory. No groundwater data derived from the field laboratory can be used for characterization aimed at closure under State guidelines.
4. Figure 3: Have there been past investigations in the area to the north, northwest of the west fueling area? If there is no soil or groundwater data from this area, RWQCB would consider this area to be a data gap in characterizing the site.

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

Sincerely,

  
Elizabeth J. Adams  
Project Manager

cc: Joseph Chou, DTSC

Mike Gill, US EPA  
Mail Stop H-9-2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, Ca. 94105-3901

January 28, 1994

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

Re: Operable Unit 1 Additional Field Investigation Technical Memorandum,  
dated December 29, 1993

Dear Mr. Chao,

The U. S. Environmental Protection Agency (EPA) has received and reviewed the subject document. The bulk of the discussion regarding groundwater monitoring wells and networks is appropriate. But there is no discussion about future monitoring. As discussed in "Conducting Remedial Investigations/Feasibility Studies for CERCLA Municipal Landfill Sites" (February 1991), many changes can occur with regard to leaching from groundwater level influence and precipitation. It doesn't appear that characterization of leaching is completed at these sites. Although the number and placement of monitoring wells appear appropriate, the newly installed wells have only been sampled once. New wells are scheduled to be sampled quarterly (p. 18) and EPA concurs that this is a necessity. It is important to include seasonal sampling to observe rainfall influence and groundwater level variability. But until this additional monitoring is done, including a wet season, a conclusion about the leaching at the landfills would be premature. Call me at 415-744-2383 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Gill".

Michael D. Gill  
Remedial Project Manager  
Federal Facilities Cleanup Office

cc: Elizabeth Adams (RWQCB)  
C. Joseph Chou (DTSC)  
Ken Eichstaedt (URS)  
Mike Young (PRC) (Fax)

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2  
700 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737



January 20, 1994

Commander  
Western Division  
Naval Facilities Engineering Command  
Attn: Mr. Stephen Chao, Project Manager  
900 Commodore Drive, Bldg. 101  
San Bruno, California 94066-2402

Dear Mr. Chao:

**DRAFT ADDITIONAL PETROLEUM SITES INVESTIGATION WORK PLAN, NAVAL  
AIR STATION MOFFETT FIELD**

The Department of Toxic Substances Control (DTSC) has reviewed the subject document and forwarding the following comments for your consideration.

**GENERAL COMMENTS**

1. In general, the Geoprobe is widely used as an effective tool for soil gas survey of large contaminated area. However, soil and groundwater samples collected with the Geoprobe should be analyzed at an off-site laboratory to meet the specific data quality objective. The selected laboratory must be certified or accredited by the Environmental Laboratory Accreditation Program of the California Environmental Protection Agency Department of Toxic Substances Control to perform hazardous waste testing.

**SPECIFIC COMMENTS**

1. Page 6, 3rd Paragraph

It is mentioned that approximately one third of the soil samples will be sent to a State certified laboratory, the rest will be analyzed on-site. In fact, as listed in Table 1, more than half of the samples (30 of 57) are to be analyzed off-site. Therefore, instead of using this arbitrary number "one third", site specific condition should be considered in determining the number of soil samples needed to define the extent of contamination.

2. Page 28, 1st Paragraph

Please note that some of the references in the basewide QAPjP (1992) has been updated :

