



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

March 14, 1994

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

Re: Draft Final Additional Investigation of Inferred Sources Technical Memorandum,  
dated February 18, 1994

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received and reviewed the subject document and associated response to comments. In general, the Navy has adequately responded to EPA comments. However, there are a couple of issues which the Navy first needs to address.

The Navy's evaluation of potential sources contributing to the regional VOC plume uses a coarse resolution of monitoring wells. In some cases, downgradient wells are greater than 750 feet away from potentially significant groundwater contaminant sources (Building 127). The existing monitoring well network is adequate only for identifying major contaminant sources. Various EPA and DTSC comments state the position that the resolution of the investigation of additional inferred sources could be refined to include monitoring wells closer to buildings of interest, and thereby detect potential sources of contamination not presently detected. The Navy response to each of these indicates that the Navy believes that potential sources at Moffett Field are adequately characterized, and that the installation and sampling of additional monitoring wells closer to buildings of interest would not significantly improve the current understanding of contaminant distribution in the west side aquifers. Further, the Navy indicates that the selection of areas to investigate was made as a consensus with EPA and RWQCB and is presented in approved sample plans. The argument presented by the Navy that lack of detection of VOCs at concentrations one order of magnitude greater than regional VOC concentrations (MEW plume) indicates Moffett Field contains no sources of major contamination is likely correct. However, because of the relatively coarse resolution of the monitoring well network, smaller potential sources of contamination may go unidentified. From a remedial standpoint, these potential smaller areas of contaminant contribution may not significantly impact the remedial alternative selection, well placement, or duration of remediation needed to reach a particular cleanup level. However, as remediation progresses and regional VOC concentrations decline, potential local areas of contamination at Moffett Field may provide continuing sources of groundwater contamination and may cause continued local areas of elevated levels of VOCs in the A1 aquifer. In an effort to move forward with remediation, EPA recommends that VOC concentrations in monitoring wells nearest buildings of interest, such as WSI-3, be monitored

during the remedial process for comparison with the regional VOC decline. If these wells fail to show declines in VOC concentrations as regional VOC concentrations approach cleanup levels (5 ug/L as indicated in the MEW ROD), then the possibility that a local source of VOC contamination exists should be reported to the regulatory agencies and investigated.

Response to EPA Specific Comment #18 indicates that groundwater flow directions fluctuate near the northern portion of the site because of influence from the Building 191 Lift Station and from drains located under the runways. Are the effects of these systems on the regional VOC plume understood? Do these systems cause accelerated migration of contaminants in the regional VOC plume? Is the discharge of the runway drains monitored for the presence of VOCs? These questions need to be addressed.

The Navy response to EPA Specific Comment #22 was to modify Figure 3 to present data qualifiers. The data qualifier "U" indicates TCE has not been detected at or above the listed concentrations. It should be noted that monitoring well W14-2 indicates a value of 200U ug/L. Does this mean the detection limit for TCE for this sample was 200 ug/L? If so, this detection limit is very high and an explanation should be provided of why it is so high and its usability.

Even though this is not considered a primary document, it is nonetheless important. In a conversation with the Navy, it was understood that it would be possible to incorporate these comments into the final version of the document. Call me at 415-744-2383 if you have any questions.

Sincerely,



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)