

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

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



June 16, 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:

FIELD TRIAL OF ELECTRON INJECTION TECHNOLOGY WORK PLAN, NAVAL AIR STATION, MOFFETT FIELD

The California Environmental Protection Agency (Cal/EPA) has reviewed the subject document. Please consider the following comments prepared by the Department of Toxic Substances Control (DTSC) and San Francisco Regional Water Quality Control Board (RWQCB) and respond to the State at your earliest convenience to implement this demonstration project.

1. Page 4, Section 5.1

In Table 1, the detection limit of 2 ug/L has been used for VOCs at wells 9-46, 9-14 and 61-1 which is higher than the effluent standard from NPDES permit program. For example, the daily average discharge limit of total VOCs should not exceed 0.5 ug/L (Please refer to RWQCB's letter on May 13, 1994). The quantitation limits of VOCs and other constituents in this study should be low enough to detect the concentrations above the effluent standards.

2. Page 5, Section 5.2

Please clarify the volume of toluene will be used (200uL or 200mL).

3. Page 8, Section 6

It is noted that EPA Method 8260 will be used for VOC's analysis, please specify that BTEX (benzene, toluene, ethylbenzene and xylene) will be included. In addition, the modified EPA Method 8015 or equivalence should be applied to Total Petroleum Hydrocarbons (TPH) analysis from both influent and effluent samples.

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If you have any questions, please call me at (510) 540-3830.

Sincerely,



C. Joseph Chou
Remedial Project Manager
Base Closure Unit
Office of Military Facility

cc: Mr. Ron Gervason
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

Mr. Ron Lewis
Dept. of Toxic Substances Control
400 P. Street, HQ-25
Sacramento, California 95814