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July 27, 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:

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

The California Environmental Protection Agency (Cal/ EPA) has reviewed the subject document. Comments regarding the document have been prepared by the Department of Toxic Substances Control (DTSC) and San Francisco Regional Water Quality Control Board (RWQCB). Since the subject document is not a primary document listed in the Federal Facility Agreement (FFA), the Navy should first respond to the following comments then finalize the document. The regulatory agencies will not provide comments for any draft final secondary documents. If you have any questions, please call me at 510-540-3830.

SPECIFIC COMMENTS1. Section 4.1.1., page 5, paragraph 1

Zook Road Fuel Spill site: Regarding the use of field PID for screening soil borings at eight locations and at two depths for laboratory analyses, we consider the proposed grid pattern the minimum number of samples to be taken for exploratory purposes. Additional samples must be analyzed if 'hot spots' are detected with the PID.

2. Section 4.1.1., page 5, paragraph 1

Zook Road Fuel Spill site: Please explain why semi-volatile organic (SVOC) analyses are not included in this work plan. As discussed in petroleum sites cleanup level analysis technical memorandum (PRC, 1994), the SVOCs, include Polynuclear Aromatic Hydrocarbon (PAH) should be analyzed.

2088



3. Section 4.1.1., page 6, paragraph 2

Golf Course Landfill 2: Point of clarification for the second sentence which incompletely describes previously detected contaminants within the landfill. Based on the data provided in Figures 7 and 8, detectable levels of VOCs were present in borings SBGC-1, -2, -3, and -4, and PCBs and pesticides were detected in SBGC-1, -2, and -3.

4. Section 4.4.1., page 7, paragraph 1

Golf Course Landfill 2: We question the use of a soil sample beneath the non-refuse material to establish background levels, since the material sampled may be non-native fill. Any location proposed for use to establish background will need more detailed rationale.

5. Section 4.1.1., page 7, paragraph 2

Golf Course Landfill 2: The locations of the three to five additional borings to determine thickness of refuse, landfill boundaries, and soil properties will be determined in the field. The report which describes the results of this investigation should describe what criteria was used to determine those locations.

6. Section 4.2., page 10, paragraph 3

Zook Road Fuel Spill site: The workplan indicates that two monitoring wells will be installed in this area; a third monitoring well should be installed such that two are downgradient and one upgradient of the soil contamination. This third well should be utilized for developing groundwater contours and should be analyzed for all the constituents planned for the groundwater at this site.

7. Section 4.2., page 11, paragraph 1

Golf Course Landfill 2: Monitoring wells in this area must be screened to intercept both dense and light non-aqueous phase liquids, should they be present, and must be comparable, in terms of screen length, to existing wells in the network.

8. Section 4.3.1., page 11, paragraph 1

Zook Road Fuel Spill site: Analyses to be performed on groundwater samples should include semi-volatile organics.

Mr. Stephen Chao
July 28, 1994
Page Three

9. Section 4.3.1., pages 11 and 12

Zook Road and Golf Course Landfill: Reported results of this investigation must include groundwater contour maps.

10. Section 4.4., page 13, paragraph 1

Golf Course Landfill: As with number 4 above, the results of this investigation must describe the criteria used for the Hydropunch locations selected in the field.

Sincerely,



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

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