

MOFFETT FEDERAL AIRFIELD

**RESPONSE TO COMMENTS ON BUILDING 191
EVALUATION DRAFT TECHNICAL MEMORANDUM**

NOVEMBER 8, 1994

This report presents responses to comments received from the Navy on the draft Moffett Federal Airfield (MFA) Building 191 Evaluation Technical Memorandum dated September 14, 1994. Comments were received from Mr. Don Chuck in a letter dated November 1, 1994.

1.0 GENERAL COMMENTS

Comment Number 1. Based on the information presented in this report, it does not appear that the aeration devices on the discharge pipes of the Building 191 are effective at preventing volatile organic compounds (VOCs) from exceeding the National Pollution Discharge Elimination System (NPDES) requirements. Review of the sample results for trichloroethene (TCE) shows a reduction only for the 7/28/93 sampling event. Subsequent sampling events show TCE levels to remain the same or increase. The 11/10/93 event shows that TCE levels exceeded requirements (12 $\mu\text{g/L}$) in the channel, however we don't have data to indicate what the influent TCE levels were.

Further evaluation of the aeration system is needed. Consideration should also be given to the conclusion that, as presently installed, this treatment system will not insure that discharge from the Building 191 pumps will not exceed the NPDES requirements.

Response: Data indicate that the treatment system is not effective at preventing VOCs from exceeding NPDES requirements. However, data cannot be solely used to gauge the effectiveness of the aeration system, since the influent VOC concentration is low to begin with. The treatment system has not been tested under high VOC influent concentrations. Under higher influent concentrations, significant VOCs reductions should occur. The treatment

system should continue to operate until sufficient data indicate that it is not effective for removing VOCs even at higher influent conditions.

2.0 SPECIFIC COMMENTS

Comment Number 1. Section 1.0, Paragraph 1, Second Sentence, Page 1. The sentence states that Building 191 pumps shallow groundwater from the northern runway area. While this may be true, it should be pointed out that the groundwater is the result of infiltration to the storm drain system. The pumping station was never built or intended for use to pump groundwater. Please correct the sentence.

Response: The sentence has been corrected.

Comment Number 2. Section 3.0, Paragraph 1, Third Sentence, Page 1. Remove the word well and use cistern only. The use of the word well implies that the cistern was built to supply or access water which is not the case. The only purpose of the cistern is to collect water from the various drains for discharging. In addition to cistern, sump or reservoir could be used. Additionally, both pumps normally operate during a discharge event, not just pump number 1.

Response: This paragraph has been modified to reflect changes. Corrections have been made regarding the operation of the two pumps rather than only pump number 1.

Comment Number 3. Figure 1. The structure labeled "wet well" is in reality part of the cistern. Remove the term "wet well" (see Comment Number 2 about the use of the word well). The figure should also indicate that the influent sump is connected to the cistern by a grate. Remove the word well from in front of cistern.

Response: The figure has been modified as requested.

Comment Number 4. Section 3.0, Paragraph 2, Page 3. Remove the word well from in front of cistern in the second sentence; change pump to pumps since both operate in normal operation, although pump number 1 will come ahead of pump number 2. Remove well from in front of cistern in the third sentence. The sixth sentence states that pump number 2 operates only during significant storm events. This is incorrect. Both pumps operate during normal operations.

Response: The corrections have been made accordingly.

Comment Number 5. Section 4.0, Page 4. Use of the November 10, 1993, data does not seem to be useful to this report. Since the purpose of this technical memorandum is to discuss evaluate the effectiveness of the aeration screens, supporting data should include both influent and effluent samples. This sample is effluent data only. While it indicates that TCE was found in the Northern Channel, without knowing the TCE concentration of the influent to the pumps, no conclusions can be made concerning the effectiveness of the aeration screens at reducing TCE. Consideration should be given to remove this data from the report.

Response: These data were presented in the technical memorandum for Navy's information. As indicated in the comment, these data cannot be used to evaluate the effectiveness of the treatment system. Therefore, the November 10, 1993, data have been removed from the report.

Comment Number 6. Section 5.0, Last Sentence, Page 5. The recommendations should include influent sampling during storm events as well as effluent.

Response: The sentence has been modified accordingly.