

**MOFFETT FEDERAL AIRFIELD  
RESPONSE TO COMMENTS ON  
NAVAL EXCHANGE GASOLINE STATION INVESTIGATION  
DRAFT TECHNICAL MEMORANDUM**

**February 9, 1995**

This report presents point-by-point responses to U.S. Environmental Protection Agency (EPA) comments on the Naval Exchange (NEX) Gasoline Station Investigation Draft Technical Memorandum submitted August 24, 1994 by the U.S. Navy for Moffett Federal Airfield (MFA), California. Mr. Michael Gill of EPA submitted comments in a letter dated October 24, 1994. The following text presents EPA comments (in italics) and Navy responses. The California Environmental Protection Agency Department of Toxic Substances Control (DTSC), or the San Francisco Bay Regional Water Quality Control Board (RWQCB) have not provided comments on the draft technical memorandum.

**GENERAL COMMENTS**

Comment 1. *It is important to note that groundwater samples were not analyzed for volatile organic compounds during this investigation. While the intent of his investigation may have been to determine the extent of gasoline-related contaminants in the area of the NEX gasoline station, it is in the best interest of the Navy to include a VOC [volatile organic compounds] analysis for all soil and groundwater samples taken in this area. The reason for this is that the gasoline station is within very close proximity (less than 200 feet) to other sites contaminated or potentially contaminated with VOCs. It only makes sense to have analyzed groundwater samples for VOCs. We did not receive the work plan (January 14, 1994) which should have described this analytical suite (reference PRC 1994).*

Response: Groundwater samples from the four wells installed as part of this investigation (WNX-1, WNX-2, WNX-3, and WNX-4) and the two existing wells at and downgradient of the site (W9-30 and W9-29) were analyzed for purgeable total petroleum hydrocarbons (TPH), semivolatile organic compounds (SVOCs), organic lead, and VOCs. VOCs were included in the analytical suite since groundwater at the NEX gasoline station is contaminated with trichloroethane (TCE) from the

Middlefield-Ellis-Whisman regional VOC groundwater contamination plume. Soil sample analyses did not include VOCs since the NEX gasoline station underground fuel storage tanks were used to store gasoline.

The text in the technical memorandum has been revised to clearly summarize the soils and groundwater analytical suites. Data summary tables in the report present analytical data, and Appendix C presents all analytical data received from the analytical laboratory.

The Navy inadvertently neglected to submit a copy of the work plan to the EPA. The work plan elements included analysis of groundwater samples for VOC contamination.

#### SPECIFIC COMMENTS

Comment 1. Section 2.0, Page 5 Paragraph 4. *Why was the groundwater sample at Sump 25 not analyzed for VOCs?*

Response: Sump 25 is a potential source of petroleum contamination to soil and groundwater. Consequently, soils and groundwater from the sump excavation were analyzed for petroleum contamination following California regulatory agency-approved analytical procedures. A soil sample was also analyzed for VOCs. Additionally, a water sample collected from the sump in 1986 was analyzed for VOCs. The analysis indicated low levels of chloroform (50 micrograms per kilogram [ $\mu\text{g}/\text{kg}$ ]). Analytical data indicate the sump to be a source of petroleum contamination in soil and groundwater. Additional data are required to evaluate the extent of contamination and develop a corrective action plan. The site will be investigated to evaluate the extent of soils and groundwater contamination from this source. The investigation will evaluate the extent of VOC contamination in soils and groundwater to confirm initial findings. The Navy anticipates this investigation will take place in 1995.

Comment 2. *Table 3, Page 9. Why were VOCs not analyzed for in soil at Tanks 41A and 41B and for Sump 25 in groundwater?*

Response: Tank 41A was used to store waste oil. Per state requirements, a soil sample collected during removal of Tank 41A was analyzed for VOC contamination. Soils and groundwater around Tank 41A are being investigated under a separate contract task order and will be analyzed for VOC contamination. The Navy anticipates this investigation will take place in 1995.

According to Navy records, Tank 41B was an oil/water separator. Samples collected during tank removal were not analyzed for VOCs. Tank 41B is being closed under actions separate from the NEX. A closure report for Tank 41B (in preparation) will address VOCs in soil at this site.

As stated in the response to specific comment number one, groundwater VOC contamination will be evaluated in the planned investigation of Sump 25.

Comment 3. *Section 4.2.1, Page 23 and Figure 9, Page 26. Benzene is a CERCLA [Comprehension Environmental Response, Compensation, and Liability Act] substance and needs to be considered in the Station-Wide RI [remedial investigation] (for cumulative risk assessment purposes), even though benzene at petroleum sites is being remediated with other petroleum products.*

Response: Although benzene is recognized as a hazardous substance in the Code of Federal Regulations (CFR) and the California Code of Regulations (CCR) (40 CFR 261.24, Table 1; CCR, Title 22) the National Contingency Plan (NCP) specifically excludes petroleum and petroleum-related constituents as a regulated substance under CERCLA. The Navy has negotiated with DTSC and RWQCB soil and groundwater action levels for purgeable TPH and benzene, toluene, ethylbenzene, and xylenes which are protective of human health and groundwater quality. Corrective actions at the site will incorporate these cleanup levels. The Navy will evaluate benzene detections in the stationwide RI risk assessment.

Comment 4. Section 5.4, Page 36, Paragraph 1. *A proposal for a Corrective Action Plan timetable needs to be included with this document.*

Response: The document has been revised to include a Navy-anticipated timetable for corrective action plan submittal.