

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

70 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737
(510) 540-2122

April 4, 1995

Commander
Department of the Navy
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Stephen Chao, Project Manager
900 Commodore Drive, Bldg. 101
San Bruno, California 94066-2402

Dear Mr. Chao:

**DRAFT WORK PLAN RECIRCULATING IN SITU TREATMENT (RIST) SYSTEM,
SITE 14 SOUTH, MOFFETT FEDERAL AIRFIELD (FORMERLY NAVAL AIR
STATION MOFFETT FIELD)**

The Department of Toxic Substances Control (DTSC) and the San Francisco Regional Water Quality Control Board (RWQCB) have reviewed the subject document and are forwarding following comments for your consideration. If you have questions, please contact me at (510) 540-3830 to ensure a coordinated approach for all regulatory comments.

SPECIFIC COMMENTS1. Page 3, Section 2.7, 5th Paragraph

It is stated that the 6-inch diameter schedule 40 PVC, 0.01-inch wire-wrapped casing will be used for the extraction well. However, the Site 14 South Evaluation Report (PRC Dec. 1994) mentioned that the well will be constructed of stainless steel casing. Please explain the discrepancy between these two documents.

2. Page 4, Section 2.8, 5th Paragraph

Please provide information of the volume of soil which will be excavated, and where it will stored prior to offsite disposal.

3. Page 8, Section 2.16, 1st Paragraph

Please explain how the BTEX clean up levels in soils were determined.

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4. Page 10, Section 9.0, last Paragraph

It is inappropriate to assume that all investigation derived waste will be acceptable for disposal at non-hazardous disposal facilities. . A contingency plan should be prepared by the Navy.

Sincerely,



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

Enclosure

cc: Mr. Michael Bessette
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 St.
San Francisco, California 94105

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

FRANCISCO BAY REGION

WEBSTER STREET, SUITE 500

OAKLAND, CA 94612

(510) 286-1233



March 27, 1995

File No. 2189.8009 (MMB)

Mr. Joseph Chou
DTSC Region 2
Office of Military Facilities
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2737

SUBJECT: RWQCB's Comments on the Work Plan Recirculation in Situ Treatment (RIST) System Site 14 South Moffett Federal Airfield, dated January 1995.

Dear Mr. Chou:

RWQCB staff has review the above referenced report and has the following brief comments.

- Please include a plan for the testing of generated waste material to determine if they are hazardous.
- Specify a licensed land surveyor will survey the site.
- Cite the Uniform Building Code under which the electrical wiring compiles.

Please call me at (510) 286-1028 if you have any questions or comments.

Sincerely,

Michael M. Bessette
Remedial Project Manager