

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2

300 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 FINAL TECHNICAL MEMORANDUM SITE 14 SOUTH EVALUATION,  
MOFFETT FEDERAL AIRFIELD (FORMERLY NAVAL AIR STATION MOFFETT  
FIELD)**

The Department of Toxic Substances Control (DTSC) and San Francisco Regional Water Quality Control Board (RWQCB) have reviewed the subject document. The following comments remained unresolved in the draft final version. Please respond to all comments, then the document can be finalized. If you have questions, please contact me at (510) 540-3830 to ensure a coordinated approach for all regulatory comments.

**SPECIFIC COMMENTS**

1. Section 3.2.2, Page 15, first paragraph

The discussion of TPH samples that do not match standards for TPH should be clarified. Is TPH purgeable assumed to be gasoline? If so, then the compounds that do not match standards may be either extremely weathered product, diesel, JP-4 or JP-5. This should be clarified and the protocol expanded to identify the actual compounds detected. If the compounds that do not match the standard within the 90% criteria are identified as diesel, JP-4 or JP-5 then future analyses should also include SVOCs.

2. Section 3.3, Page 20, third paragraph

Influent and effluent analysis may also need to be modified dependent upon the resolution of Comment No. 2.

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3. Section 3.1, Page 30, third complete paragraph

A second GAC unit is not intended to address only system efficiency but also to provide system redundancy and to allow efficient change out of exhausted units without system shutdown. Therefore, it may be appropriate to include the cost of a second GAC unit for this alternative.

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**

SAN FRANCISCO BAY REGION

WEBSTER STREET, SUITE 900  
OAKLAND, CA 94612  
(510) 286-1255

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 Site 14 South Evaluation Report Draft Final, for Moffett Federal Airfield dated December 19, 1994.**

Dear Mr. Chou:

RWQCB staff has reviewed the above referenced report and has the following comments.

**General Comments:**

- Determination and reporting of the RIST effectiveness and contamination migration are not clear and should be included in both this document and the operation and maintenance manual. Time tables and the types of data to be presented should be documented. Treatability studies, i.e., respiration, plate counts, etc., of the soil and groundwater might be considered evaluate bioremediation effectiveness. Present a contingency plan to address contamination migration in groundwater.
- The delineation of groundwater contamination as shown in Figure 6 is not demonstrated by the depicted monitor wells as nondetect wells are not located. Are there other monitor wells that were used but not shown in Figure 6?
- Please include Mr. Thomas Iwarmura, of the Santa Clara Valley Water on the distribution list for all Site 14 reporting.

**Specific Comments:**

**Page 4, Sec. 2.0, Last par. :** The text states that groundwater data will be presented in quarterly groundwater monitoring reports that are currently prepared by the Navy and that these reports will be reviewed by the agencies to determine the effectiveness of the remedial activities. Please clarify whether this is referring to the whole of the A1 aquifer or specifically to Site 14 South.

**Page 5, Sec. 2.0:** At this time the nonattainment area amendments to the basin plan are being reviewed by the State Water Resource Control Board and open for public comment. Final text has not been

determined and it is inappropriate to define a nonattainment area using nonpromulgated text in this format.

**Page 31, Sec. 4.2:** Please clarify the statement in the second paragraph "the extraction well will be located in the area of highest groundwater contaminant concentrations" and the statement in the third paragraph "the extraction well will be located in the down gradient area from the percolation zone."

**Page 34, Sec. 4.2 2nd par.:** Will any air filter or venting be incorporated in the below ground sump.

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

Sincerely,

A handwritten signature in cursive script that reads "Michael M. Bessette". The signature is written in black ink and includes a long horizontal flourish extending to the right.

Michael M. Bessette  
Remedial Project Manager