

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

7000 SHILBURN AVE., SUITE 200
BERKELEY, CA 94710-2737

June 5, 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 WASH RACK AREA INVESTIGATION FIELD WORK PLAN, MOFFETT
FEDERAL AIRFIELD (MFA)**

The Department of Toxic Substances Control (DTSC) and the San Francisco Regional Water Quality Control Board (RWQCB) have reviewed the subject document and prepared the following comments for your consideration:

1. Please clarify how this investigation can be used to "evaluate the need and responsibility for an A1-aquifer zone groundwater extraction well" in Section 2.0.
2. The petroleum cleanup level is not applicable to the commingled plume of petroleum and other volatile organic carbons (VOCs) at MFA. Instead, individual chemical data should be available for site specific risk assessment and cleanup activities. If there is a commingled plume in the wash rack area, then semi-volatile organic carbons (SVOCs) analysis should be included in the soil and groundwater investigation. Furthermore, the detection limits of all analytes should be low enough to reflect the cleanup levels.

Please incorporate all comments, then the document can be finalized. If you have any questions, please contact me at (510) 540-3830.

Sincerely,

Handwritten signature of C. Joseph Chou in black ink.

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

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2260

Mr. Stephen Chao
June 5, 1995
Page 2

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

Ms. Sandy Olliges
Assistant chief
Safety, Health and Environmental Services
National Aeronautics and Space Administration
Ames Research Center
Moffett Field, CA 94035-1000

Mr. Peter Strauss
MHB Technical Associates
1723 Hamilton Avenue, Suite K
San Jose CA 95125

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

2101 WEBSTER STREET, SUITE 500

OAKLAND, CA 94612

(510) 464-1255



June 2, 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 Draft Wash Rack Area Investigation Field Work Plan, April 21, 1995, for Moffett Federal Airfield.

Dear Mr. Chou:

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

- How will the information obtained from this investigation demonstrate the need and responsibility for the proposed A1-aquifer zone groundwater extraction well (TBD-1A)? Please state what criteria will be evaluated to make these determinations; thus, insuring appropriate first-round data collection. If the objective includes determine the nature and extent of contamination, additional chemical analysis and a strategy for delineation of the extent of contamination should be presented.
- Describe the reporting of the investigation data, results, and conclusions and include this item on the schedule in Section 7.0.
- Indicate the proposed location groundwater well TBD-1A on Figure 3 and if not possible, on Figure 2.
- Please include the detection limits for all proposed chemical analytical analysis of soil and groundwater samples.

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

Sincerely,

Michael M. Bessette

Remedial Project Manager

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To	JOSEPH CHOU	From	MICHAEL BESSETTE
Co.	DTSC	Co.	RWQCB
Dept.	DOD	Phone #	(510) 286-1028
Fax #	(510) 540-3819	Fax #	(510) 286-3786