

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
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BERKELEY, CA 94710-2737

June 22, 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 ADDITIONAL SITES INVESTIGATION PHASE II REPORT, 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. Page 11, Section 1.5.4

It is correct that soil and groundwater cleanup levels at the petroleum sites does not include polynuclear aromatic hydrocarbons (PAHs). However, should PAHs be found through future confirmation analysis, the Navy will cleanup the contaminated soils to EPA PRGs accordingly.

2. Page 56, Section 5.1

Please note that the Petroleum Cleanup Levels at MFA was negotiated between the DTSC, RWQCB and the Navy. In DTSC's letter dated July 6, 1994, it was clearly stated that the soil cleanup levels at the petroleum sites must be based upon fuel constituents of concern and are intended to be protective to water quality. Cleanup levels based on total petroleum hydrocarbon (TPH) are not acceptable to DTSC. In the same letter, DTSC also addressed "Since benzo(a)pyrene has not been detected in other petroleum sites, the DTSC agreed with the Navy not to include PAHs in the current Moffett Field petroleum sites soil cleanup goals. The decision is based on the site specific information provided by the Navy, and is not contradictory with DTSC's policy of setting risk-basis individual constituent cleanup goals. This management decision shall not be applied to other federal facilities".

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3. Page 59, Section 5.3

Please note that CIWMB has determined that the Golf Course Landfill meet the definition of a solid waste disposal site pursuant to PRC 40122 and have not closed pursuant to the definition 14 CCR 18011, and therefore meet the scope and applicability of closure and postclosure standards in 14 CCR.

If you have any questions, please contact me at (510) 540-3830.

Sincerely,



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

cc:

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