

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BLISSFIELD, CA 94710-2737

N00296.002737
MOFFETT FIELD
SSIC NO. 5090.3



December 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:

**RECOMMENDATIONS FOR CORRECTIVE ACTIONS AT THE IRP PETROLEUM
SITES, MOFFETT FEDERAL AIRFIELD**

The Department of Toxic Substances Control (DTSC) and the San Francisco Regional Water Quality Control Board (RWQCB) have reviewed the subject document. The attached comments are prepared by RWQCB, please incorporate all comments in future corrective action documents. If you have any questions, please call me at 510-540-3830.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Joseph Chou".

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

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. Stephen Chao
December 5, 1995
Page 2

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

Mr. James G. McClure, Ph.D.
Moffett Field RAB, THE Committee
c/o Harding Lawson Associates
P.O. Box 6107
Novato, California 94948

Prepared By: Michael M. Bessette *mmB* Phone No.: (510) 286-1028
Date: November 30, 1995 File No.: 2189.8009 (MMB)
Subject: Recommendations for Corrective Actions at the IRP Petroleum Sites,
Moffett Federal Airfield.

General Comments:

- Please present a groundwater monitoring program assessing potential contaminant migration and corrective action effectiveness. The monitoring program should present a rationale for specific chemical analysis, sampling frequency, and sampling locations.
- Please present a soil monitoring program evaluating the effectiveness of the remedial system. Assessment of the degree of cleanup level attainment near the end of the system operation (estimated to be 3 or 4 years) by one round of sampling precludes the gathering of time valued data which could be useful in design modifications for other sites and aid in the observation of potentially earlier remediation.
- For the sites where excavation is recommended, please describe the field verification process delineating the depicted estimated and hypothetical areas exceeding soil cleanup levels and delineating the extent of excavation.
- The text states that this document is intended to augment remedial options presented in the Petroleum Sites Corrective Action Plan (CAP) (PRC 1994); however, there are other documents which should also be augmented by these recommendations and should be listed. As the differences of the recommended remedial strategy are difficult to determine from one document to the other, please compare and contrast each site specific recommended remedial option as presented in the CAP or a Technical Memorandum and this document.
- Please revise the figure to depict all soil sampling locations delineating of the extent of soil contamination and groundwater monitoring wells delineating the extent of groundwater contamination. This information should facilitate the determination of future monitoring locations.

Specific Comments:

Page 2, Site 9: Please indicate the locations, depths, and status the of the former dry wells.

Page 4, Site 15: In the interest of saving time and money and providing a comprehensive cleanup, evaluate the incorporation of Sump 25 into the NEX Site corrective action.

Page 4, Site 19, 3rd para.: The ND soil samples are stated as being collected immediately north of the northern sidewall, please revise to indicate the uncertainty of the original sample locations. Please revise the following sentence indicating that "based on agreed soil cleanup levels, soil remediation is required at this site."