

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**

SAN FRANCISCO BAY REGION

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July 22, 1996

File No. 2189.8009 (MMBR)

Mr. Stephen Chao  
Engineering Field Activity West  
Naval Facilities Engineering Command  
San Bruno, California

**SUBJECT: RWQCB's Comments on the Site 9 Low-Risk Evaluation Report  
dated March 27, 1996.**

Dear Mr. Chao:

Below are RWQCB staff's comments on the above referenced report.

**General Comments:**

- 1) Because the intent of the Site 9 Low-Risk Evaluation Report was to create a document with a format that could be used for other sites at Moffett, this report has been reviewed by a variety of Board staff and has received favorable review. In general, the presentation is clear and concise and the use of maps and tables allows for efficient data analysis.
- 2) The main deficiency of the report is that while the inhalation pathway is identified as the pathway of concern in the risk analysis, the report does not include a clear plan to address the risk. It is unclear if additional a higher tier analysis will be performed after sample collection or if the risk assessment will be refocused on the mitigation of the inhalation pathway. This is important and must be included in the report to understand how much risk is present at the site and if the remedy is appropriate.

**Specific Comments:**

- 1) **Page 4, Sec. 2.0:** The discussion regarding the source removal and characterization should provide information on the existence and potential impacts of horizontal and vertical conduits within the site area.

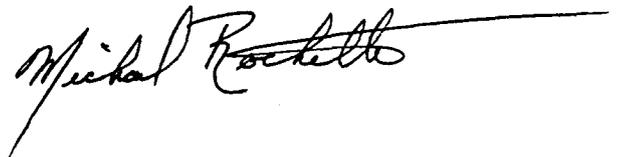
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**Specific Comments (continued):**

- 2) **Page 11, Table 1:** The Tables must include the detection limits and specific analytical methods either in the Tables or in the Notes.
- 3) **Page 17, Table 2:** The Tables must include the detection limits and specific analytical methods either in the Tables or in the Notes.
- 4) **Page 24, Sec. 3.1, par. 3:** Please include the specific time frame for groundwater monitoring which demonstrates plume stability.
- 5) **Page 26, Sec. 3.2, par. 2:** Please locate the identified horizontal conduits on Figures 2 and 3.
- 6) **Page 28, Sec. 4.1, par. 2:** Please provide additional information supporting the exclusion of residential and recreational exposure scenarios. Are residential scenarios a potential in the future? What institutional controls are proposed to prohibit changes in land use?
- 7) **Page 29, Sec. 4.1, par. 2:** Please include Risk Based Screening Levels set to address the risk created by accumulation of vapors in buildings and present the risk findings.
- 8) **Page 30, Sec. 4.2:** The conclusion stating that the SVE/AS system is not necessary because mitigation of the risk associated with the vapors in the buildings would require an entirely different system needs to be expanded. The conclusion should discuss the potential of a higher tier analysis or mitigation options to address each aspect of risk with regard to sources, exposure pathways and potential receptors.

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

Sincerely,



Michael Bessette Rochette  
Remedial Project Manager