



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

February 10, 1997

Mr. Stephen Chao
Naval Facilities Engineering Command
Engineering Field Activity, West
900 Commodore Way, Bldg. 210
San Bruno, CA. 94066-2402

Re: Unauthorized Discharges From Building 45 Treatment System

Dear Mr. Chao,

Many overflow events to surface water from the Building 45 treatment system (discharge of untreated groundwater) have occurred since the rains started this season. We have appreciated receiving the Building 45 overflow reports from Don Chuck at Moffett Field. Although trivial overflows occurred in the past, these recent discharges have been much greater in volume and point out potential system design deficiencies that need to be corrected. Based upon effluent sampling results received via email (dated 2/3/97), there is a need for immediate action. The cleanup levels for this area of the west side aquifer are codified in the MEW Sites Record of Decision (1989). This ROD was adopted by the Navy in 1993 and applies to the cleanup of this aquifer. While we recognize that various design changes are being investigated to fix these discharge problems, our concern is that a correction be implemented as soon as possible. The rains could continue until April and in turn, continue to cause untreated water discharges. As an immediate measure, all overflow water should be diverted to a temporary holding tank to avoid further untreated water discharge. Discharges to surface water above cleanup standards are infractions to the ROD. We are willing to work with you to find a solution to this problem. Once again, we appreciate the up to date status reports. If you have any questions, please call us (J. Chou at 510-540-3830, M. Gill at 415-744-2385, M. Rochette at 510-286-1028).

Sincerely,

Handwritten signature of C. Joseph Chou.

C. Joseph Chou
RPM, Cal/EPA - DTSC

Handwritten signature of Michael D. Gill.

Michael D. Gill
RPM, U.S. EPA

Handwritten signature of Michael Rochette.

Michael Rochette
RPM, Cal/EPA-RWQCB

cc: D. Chuck (Navy), K. Eichstaedt (URS), T. Mower (PRC) (email), S. Olliges (NASA),
P. Strauss (MHB)