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MOFFETT FIELD
SSIC NO. 5090.3.A.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

June 3, 1997

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

Re: Proposed Groundwater Monitoring Program for West-Side Aquifers, letter dated May 15, 1997

Dear Mr. Chao,

This letter represents EPA's comments on the Navy's proposed monitoring wells for the West Side Aquifer Treatment System (WATS). It is a response to the Navy letter of May 15, 1997, which superceded the descriptions of monitoring wells in both the WATS Long Term Groundwater Monitoring Plan and the WATS Definitive Design Report. While parts of the proposal make sense, other parts appear to show the Navy unwilling to meet its previous commitments for monitoring well responsibility with the MEW companies. Two documents recently released (WATS Definitive Design and WATS Long Term Groundwater Monitoring Plan) both outlined more inclusive monitoring well coverage. For the most part, we believe that the Navy should meet its original commitment. In addition, this letter was sent only days before the baseline sampling work was to begin. This type of expedited review is unfair to the regulatory agencies.

The tables below outline our rebuttals to the removal of most of the wells. We believe the Navy should retain the majority of the original proposal for the baseline sampling and modify the long term monitoring wells only if acceptable to the regulatory agencies. Only until actual pumping starts should any long term changes be made. It is very important to have sufficient baseline monitoring data, as this will be the data that the Navy will be comparing to the long term data collected and presented to the regulatory agencies in the future for system closure. If done properly to produce scientifically defensible data, it may reduce overall pumping time and system operation and maintenance.

In summary, we would suggest retaining most of the wells in the baseline and semiannual sampling rounds. It is important to gather this data so that any treatment system decisions made in the future can be scientifically defensible. In addition, all but a few of the long term monitoring wells should be retained. Only those wells which are clearly duplicative should be eliminated. In the future, modifications may be made to the long term wells sampled, if justified. If you have any questions, please call us (Loren Henning at 415-744-2243 or Michael

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Gill at 415-744-2385).

Sincerely,

Loren Henning
RPM, MEW Sites

Michael D. Gill
RPM, Moffett Field

cc: Ingrid Chen (Raytheon)
J. Chou (DTSC)
K. Eichstaedt (URS) (email)
V. Tom Jones (Schlumberger)
T. Mower (PRC) (email)
S. Olliges (NASA) (email)
M. Rochette (RWQCB)
P. Strauss (MHB) (email)

This first table is based on page 3 of the letter; changes to the baseline and semiannual wells.

Monitoring Well	Navy Rationale for Removing Well	EPA Response	Other Comments
W9-19	Date from W9-44	No - was previously agreed to with MEW in March 97 meeting	
W29-1	Data from W9-10 and W29-5	No- leaves a 400 foot gap between wells	
WNX-1	Data from WNX-3	No - only leaves one remaining well for the entire NEX gas station area	
WU4-17	Data from 14D05A	No - necessary to help define capture zone	
W9SC-14	Data from W9-18 and W9-37	Possibly, but this or W9SC-17 necessary to help define capture zone	By eliminating both W9SC-14 and W9SC-17, leaves only one well downgradient of the Building 88 Navy source area
W9SC-17	Data from W9-18 and W9-37	Possibly, but this or W9SC-14 necessary to help define capture zone	same as above
W9-22	Data from 80B1	No - necessary to help define capture zone	

The following table addresses Table 3 from the letter; changes to the long term monitoring wells.

Monitoring Well	Navy Rationale for Removing Well	EPA Response
WWR-1	Sample EA1-2	OK
WWR-2	Data from 73A and WNX-3	No - leaves 400 foot gap. Also, cannot rely on using data from 73A, which is an MEW well
W29-3	Sample EA1-3	No - necessary for defining capture zone
W9-24	Sample from 14C31A and W9-10	No - leaves 625 foot gap
WU4-14	Sample EA1-4	OK
WU4-8	Sample EA1-5	OK
W9-1	Data from W29-4 and W56-2	No - leaves 500 foot gap
W9-2	Data from W29-4 and W56-2	No - leaves 500 foot gap
W9SC-13	Data from W56-2 and EA1-6	No - leaves 400 foot gap
14D05A	Sample EA1-6	OK
14D12A	Sample REG-6A	No - it is in the downgradient area of the Navy carveout area, plus REG-6A is an MEW well
W9-20	Sample EA2-1	No - necessary for defining capture zone
W9-28	Sample EA2-1	No - in an area of great variability; also needed to define capture zone
W9-34	Data from W9-8 and W9-9	No - leaves 700 foot gap
W29-8	Data from EA2-1 and EA2-2	No - 600 feet away
80B1	Sample EA2-2	OK