

Semiconductor Division
350 Ellis Street
Mountain View, CA 94043
Tel 415.968.9211
Fax 415.969.8556

Raytheon Electronics

March 10, 1999

Ms. Eugenia Chow
Project Manager
Superfund Program H-7-3
Hazardous Waste Management Division
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

*Re: Comments on Tetra Tech EM Inc.'s February 16, 1999 Letter
Entitled: Plan to Improve Yield of Extraction Wells, West Side Aquifers
Treatment System, Moffett Federal Airfield*

Dear Ms. Chow:

The purpose of this letter is to provide EPA with general comments on the referenced letter. As you know, certain of the source control recovery wells installed by the Navy at Site 9 are not operating to specifications. The purpose of the Tetra Tech letter was to propose procedures to address these wells. We are pleased to see that the Navy is investigating the operation of the wells, but two issues still need to be addressed.

1. Although the February 16, 1999 letter identifies the work that will be performed, it does not provide a schedule to perform the work. It is important that the Navy investigate the operation of these wells in a timely fashion.
2. The letter states in step three of the proposed work that if "steps 1 and 2 do not improve well yield to at least 2 gpm, further action may be warranted." This statement implies that if a pumping rate of 2 gpm is established, then no further action would be necessary. This would contradict the objectives of the remedial actions implemented at Site 9. It is very important that the pumping activities by the Navy actually establish hydraulic control of Site 9, which may necessitate pumping rates higher than 2 gpm from the well, or installation of additional recovery wells. In accordance with the procedures followed by the MEW companies, the optimal pumping rate can be selected iteratively by changing pumping rates in recovery wells, measuring water elevations, then estimating capture zones.

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Should you have questions regarding this letter, please call me at (650) 631-7709.

Sincerely,



Ingrid Y. Chen
Manager, Environmental Programs

IYC/mmm

cc: Gordon Atkinson, Cooley Godward LLP
Fred Banker, RMT, Inc.
James Boarer, Locus Technologies
Stephen Chao, Navy
James McClure, Harding Lawson Associates
Hollis Phillips, URS
Lynn Suer, EPA
Thomas Trapp, Landels, Ripley & Diamond