



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

March 31, 1999

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

Re: Comments on East-Side Aquifer Treatment System, Draft Final Operation and Maintenance Manual by Tetra Tech EM, Inc. dated December 31, 1999.

Dear Mr Chao:

The U.S. Environmental Protection Agency has reviewed the above referenced document. Overall, it is well written and thorough. We have a few minor concerns and suggestions for revision, which are described in the attached comments.

If you have questions, please contact me at (415) 744-2396.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Suer".

Lynn Suer, Ph.D.
Remedial Project Manager

Attachment

cc: Joseph Chou, RWQCB
Tim Mower, TTEMI
Sandy Olliges, NASA
James McClure, RAB
Peter Strauss, RAB

U.S. EPA Comments on
MOFFETT FEDERAL AIRFIELD
East-Side Aquifer Treatment System
DRAFT FINAL OPERATION AND MAINTENANCE MANUAL
December 31, 1998

General Comments:

1. Overall, the document is thorough and complete. No significant deficiencies or errors were identified.
2. Collecting water level information from the piezometers adjacent to the wells as part of the regular operations and maintenance should be considered. This will provide information useful for maximizing the drawdown from the wells.
3. Sample ports are labeled with a different notation in the text and the as-built drawings. Please correct so the notation is consistent, and provide a drawing solely used for identifying the sample ports.
4. Overall, the manual correlates with the MEW "Operation and Maintenance Plan, Regional Ground Water Remediation" dated January 1999 on the basis of sampling frequency and O&M schedule. However, the MFA document has greater weekly sampling (initially) and weekly inspections.

Specific Comments:

1. Section 2.3—Controls, pg. 7: Consideration should be given to providing a shutdown for excess pressure build-up in the filters.
2. Section 3.2—Startup, pg. 9: It would be helpful for the operator to have the startup procedures provided in a checklist format.
3. Section 3.2—Startup, pg. 9, third paragraph: The term "well globe valve" is different than the text used to describe the well pump components listed ("flow control valve and manual shutoff valve") in the first paragraph of Section 2.1—Extraction System. Please clarify.
4. Section 3.2—Startup: It would be helpful to identify to the operator if the startup instructions are for manual or automatic operation.
5. Section 3.4—Operations Monitoring, Table 3, pg.12: The normal operating ranges provided in Table 3 would be helpful in the Inspection Record provided in Appendix A. This will allow the

operator to immediately see if data being recorded are indicating a problem.

6. Section 4.3.2–Antiscalant Tank (T-105), pg. 25: Identify the length of time that 375 gallons will last.
7. Section 4.3.3–Antiscalant Pump (P-106), pg. 26, second paragraph: Identify where the manufacturer’s O&M manual can be found.
8. Section 4.5.2–Liquid Phase GAC Units (V-108/V-109), pg. 30, last paragraph: Identify that the spent GAC should be profiled to minimize any downtime in the system operation.