

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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OAKLAND 94607Phone: Area Code 415
464-1255September 27, 1989
File No. 2189.8009 (LWT)

Office of Environmental Management,
Western Division
Naval Facilities Engineering Command
900 Commodore Drive, Bldg. 101
P.O. Box 727
San Bruno, CA 94066-0720
Attn: Kathy Nakazawa, Code 1811KN

Subject: Comments on Phase II proposals for Sites 4, 6, 7 and 8 at NAS
Moffett Field.

Dear Kathy:

Below are our comments regarding the draft phase II proposals for sites 4, 6,
7 and 8.

General Comment

1. The methods and procedures associated with use of the CPT/Hydropunch should be described prior to use at these sites.

Sites 4, 6, & 7

1. For the proposed investigation of Building 142/Sump 63, one of the proposed downgradient A wells and one CPT/Hydropunch should be located as close as practicable to the sump. The present proposed distance of 275 feet may not be adequate to determine if the sump has affected groundwater.
2. Figure 1 shows W7-20(A) to be 75 feet from Tank 2 instead of the 25 feet proposed in Figure 3-12 of the Sampling and Analysis Plan (SAP) dated March 30, 1988. Also, the locations of soil borings SB19-1 through SB19-3 are different than those proposed in the SAP. Similar discrepancies exist between W19-1(A), SB19-4 and SB19-5 and the SAP. These discrepancies should be explained. But more importantly, the intent of W7-20(A), as stated in the SAP, was to help determine possible leakage from Tank 2. Its present position may be not adequate to do this because of the distance from the tank, and because it does not appear to be directly downgradient of the tank. Another A zone monitoring well may be necessary immediately downgradient of Tank 2 to determine the extent of contribution of contaminants from the tank to the Site 7 area.

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Site 8

1. Section 2, 3rd paragraph

Our records indicate that soil samples from the ESA borings were not analyzed for chlorinated VOCs. The last sentence of this paragraph should be expanded to reflect this.

2. Section 5, 5th paragraph

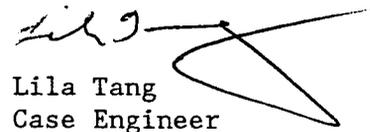
A CPT/Hydropunch is proposed to be run in the area of SB8-2 to evaluate whether groundwater is affected by the soil contamination. Installation of an A zone monitoring well in this area should also be specified if the Hydropunch sample(s) shows that groundwater has been affected.

3. Section 5, 6th paragraph

The SAP does not specify installation of a B2 well at this site contrary to what is stated in the proposal. The data do not indicate the need for a B2 well at this time. The SAP does specify installation of a B1 well in the area of the sump. The relocation of the proposed B1 well to a location upgradient of the site in the area of W8-3C is acceptable.

If you have any questions, please call me at (415)464-0884.

Sincerely,


Lila Tang
Case Engineer

cc: Lewis Mitani, EPA
Lynn Nakashima, DHS