



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

19 SEP 1988

Alex E. Dong
Head, Environmental Restoration Section
Western Division Naval Facilities
Engineering Command
P.O. Box 727
San Bruno, California 94066-0720

Dear Mr. Dong:

Please find enclosed the Environmental Protection Agency's (EPA) comments on the Removal Action Plan for Tanks 2, 14, 43, 53, 67, 68, and Sump 66 for Naval Air Station Moffett Field, California August 1988.

If you have any questions, please give me a call at (415) 974-7836.

Sincerely,

Lewis Mitani
Remedial Project Manager
Federal Enforcement Section

CC:

Regional Water Quality Control Board (Lila Tang)
National Oceanic & Atmospheric Admin. (Sharon Christopherson)
State Water Resources Control Board (Gil Torres)
Department of Health Services (Chein Kao)
Santa Clara Valley Water District (Tom Iwamura)
Santa Clara County Health Department (Charles Nicholson)
City of Mountain View (Russ Frazer)
City of Sunnyvale (Dan Firth)
U.S. Fish & Wildlife Service (Don Palawski)
California Department of Fish & Game (Mike Rugg)
San Francisco Bay National Wildlife Refuge (Jean Takekawa)

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EPA/NAVY 1213

EPA Comments for Removal Action Plan For
Tanks 2,14,43,53,67,68 and Sump 66
Naval Air Station Moffett Field

Comments are presented in a format referencing the Table of Contents section number of the document.

<u>Section</u>	<u>Comments</u>
1.0	The RI/FS currently being performed by the US Navy should incorporate data gathered during the time-critical removal action. As stated in the RI/FS work plan, an additional objective will include an evaluation of the vertical and horizontal extent of chemicals of concern in soils immediately surrounding the sump or tanks to delineate the boundaries for excavation and removal of contaminated soils and debris. This clearly indicates that information on soil analysis during the proposed removal action should be incorporated into the RI/FS for ultimate site remediation.
2.5-2.6	The estimated size and capacity of Sump 66 and Tank 68 are not presented. This makes it difficult to estimate the amount of material to be removed in each case.
3.3	Criteria for contaminated soil cleanup levels

have not yet been established in the RI/FS procedure, therefore any soil excavation resulting from the proposed tank and sump removals could be considered as a partial cleanup.

Table 3-1 EPA regulations in 40 CFR parts 264, 265, 268 and 271 are applicable to this project. These are the land disposal restrictions issued August 8, 1988, and would affect the disposal of tank rinseate and other materials associated with solvent contamination.

Table 3-1 Leaking Underground Fuel Tank Field Manual is abbreviated LUFT, not LUFTS. The table should also state that these regulations only apply to gasoline and diesel fuel tanks.

3.3 The 1000 ppm TPH cutoff level recommended by the (page 3-2, LUFT Manual to classify soil as hazardous waste 2nd paragraph applies to gasoline and diesel contamination from bottom) only. Solvent and heavy metal contamination cutoff levels to define hazardous/non-hazardous characteristics are determined either through agency negotiation or by performing a Waste Extraction Test as prescribed in Title 22 of the California Administrative Code.

3.3 The California Regional Water Quality Control (page 3-3, Board and the LUFT Manual do not give clear 1st paragraph) reference to 1000 ppm TPH as the maximum allowable soil concentration after excavation. Geological characteristics, climate and risk to groundwater are some of the factors involved. Completion of Tables 2-1 and 2-2 of the LUFT Manual (Leaching Potential Analysis) would

better define a maximum allowable TPH level. The final maximum allowable TPH level is determined on a case-by-case basis.

4.0 General procedures described in the final RI Workplan (pp. 3-10 to 3-20) for removal of the tanks covered in the Proposed Removal Action Plan imply that additional efforts for remediation, pending soil sample analysis during excavation, would be part of the RI objectives. This should be clarified in the Removal Action Plan.

4.1.1 A Health and Safety Plan (HASP) is not mentioned as part of the closure plan.

4.1.2 Heavy metal analysis is not proposed prior to potential POTW discharge. Metals are commonly found in waste solvent and oil tanks.

4.1.4 Excavated soils taken from below the groundwater table may be saturated and possibly require stabilization or drying prior to shipment offsite.

4.1.5 Spark resistant tools should be used in pipe capping and removal activities.

4.1.6 One soil sample should be taken at the end of (1st paragraph) the tank where the drain/fill pipes enter the tank.

In the case of time-critical removal actions, the waste-disposition should be specified as opposed to the statement that contaminated excavated soils will be transported to a "proper

- disposal site".
- 4.1.6 Reference is made to complete excavation
(2nd paragraph) "provided that an unreasonable amount of soil will not be removed". This statement should be further defined.
- 4.1.8 Waste disposition of groundwater pumped into drums or vacuum trucks to dewater excavation sites is not specified.
- 4.1.9 Method of compositing soil samples should be specified.
- Benzene, Toluene, Zylene and Ethylbenzene analysis is recommended by the LUFT Manual in addition to TPH for motor fuel tank excavations.
- 4.1.10 This section is not sufficient to function as a Health and Safety Plan.
- 4.2-4.2.10 See previous Section 4 comments.
- 5.0 Ground water monitoring performed as part of the RI/FS should be compared to RWQCB monitoring requirements for the removal action to see if they are in compliance.
- 6.2 Once again the reference to 1000 ppm TPH as a final contamination level does not apply to solvent tanks.
- 7.0-9.0 No comments.