N00296.000555
MOFFETT FIELD
GEORGE SSIC NO. 5090.3

STATE OF CALIFORNIA

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
1111 JACKSON STREET, ROOM 6040
OAKLAND 94607

Phone: Area Code 415
464-1255

January 9, 1989
File No. 2189.8009 (LWT)

Captain C. T. Moyer III
Commanding Officer
Naval Air Station Moffett Field
Moffett Field, CA 94035-5000

Dear Captain Moyer:

Enclosed for your information is a copy of a staff report concerning compliance status with the Cease and Desist Order issued by the Board in September 1987. It highlights the four current violations. We will present this report to the Board during a public meeting which commences at the time and place indicated:

DATE: January 18, 1989

TIME: 9:30 a.m.

PLACE: Assembly Room, First floor, State Building, 1111 Jackson Street, Oakland, California

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

Sincerely,

Steven R. Ritchie
Executive Officer

Enclosure

cc (w/enclosure): Mailing List

555

RWQCB/NAVY 28

MAILING LIST

Naval Air Station, Moffett Field
Santa Clara County

Agencies

Richard Seraydarian
Department of the Navy
Western Division,
Naval Facilities Engineering Command
P.O. Box 727
San Bruno, CA 94066

Michael Cain, Code 189
Environmental Division
Building 566
Naval Air Station Moffett Field
Moffett Field, CA 94035-5000

Russ Frazer
City of Mountain View
231 N. Whisman Road
Mountain View, CA 94043

Tom Iwamura
Santa Clara Valley Water Distric
5750 Almaden Expressway
San Jose, CA 95118

Lewis Mitani (T-4-3)
EPA Region IX
Toxics & Waste Management Division
215 Fremont Street
San Francisco, CA 94105

Don Cox
Department of Health Services
Toxic Substances Control Division
2151 Berkeley Way, Annex 7
Berkeley, CA 94704

Candice Tal
Metchalf & Eddy
1029 Corporation Way
P.O. Box 10-046
Palo Alto, CA 94303

Gil Torres
State Water Resources Control Board
Division of Water Quality
P.O. Box 100
Sacramento, CA 95801

Charles Nicholson
Santa Clara County Health Department
2220 Moorpark Avenue
San Jose, CA 95128

Michael E. Giusti, P.E.
Toxics Progam Coordinator
County of Santa Clara
70 West Hedding, 11th floor
San Jose, CA 95110

Ralph Jaeck
Acting City Manager
City of Mountain View
P.O. Box 7540
Mountain View, CA 94309

Mark Harris
Utilities Director
City of Mountain View
231 N. Whisman Road
Mountain View, CA 94043

Community Organizations

Ted Smith
Executive Director
Silicon Valley Toxics Coalition
760 N. First Street
San Jose, CA 95112

Ann Coombs
League of Women Voters
Los Altos Chapter
521 Guadalupe Drive
Los Altos, CA 94022

Mailing List (cont.)

Elected Officials

Honorable Tom Campbell
Representative, 12th Cong. Dist.
Field Office
410080 Wolfe Road, Bldg. 3, Rm 216
Cupertino, CA 95014

Honorable Byron Sher
c/o Betsy Blais Shotwell
Admin. Asst. to Assemblyman Sher
21st Assembly District
785 Castro Street, Suite C
Mountain View, CA 94041

Honorable Susanne Wilson
Supervisor, District 1
County of Santa Clara
c/o Bob Brownstein
Asst. to Supervisor Wilson
70 West Hedding, 10th floor
San Jose, CA 95110

Honorable Dianne McKenna
Supervisor, District 5
County of Santa Clara
c/o Alice Sicular
Asst. to Supervisor McKenna
70 West Hedding, 10th floor
San Jose, CA 95110

Honorable Maryce Freelen
Mayor
City of Mountain View
201 Jason Way
Mountain View, CA 94043

REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

INTERNAL MEMO

TO: Steven R. Ritchie
Executive Officer

FROM: Lila W. Tang

DATE: January 4, 1989

SIGNATURE: Lila W. Tang

SUBJECT: Status of Compliance with Cease and Desist Order No. 87-125, Naval Air Station, Moffett Field - File No. 2189.8009

The Navy is currently in violation of four task completion dates specified in the Cease and Desist Order issued in September 1987. This memo summarizes the compliance status of this facility, describes the four violations and the Navy's plans for addressing them, and lists the options available to the Board to deal with this situation.

Background

Moffett Field Naval Air Station occupies about 4,000 acres of land located between Sunnyvale and Mountain View. The Navy commenced operations at this facility in 1933. Operations involve solvent and fuel storage, and heavy equipment testing and maintenance. As part of this, the Navy handles, generates, stores and disposed of hazardous materials and wastes at the facility. The materials and wastes include industrial solvents, fuels, oils, pesticides, battery acids, paints, and polychlorinated biphenyls (PCBs).

Many of the areas where these activities are occurring, or have occurred, are sites of water quality concern. These sites include landfills, underground tanks and sumps, and miscellaneous areas. Attachment A of this memo contains a brief description of each site.

Initial subsurface investigation by the Navy, under the Navy's Installation Restoration (IR) Program, identified contaminants at nine of the sites. The Board adopted Waste Discharge Requirements Order No. 85-66 on May 15, 1985, requiring the Navy to fully define the extent of contaminants at each one of these sites. The Navy performed an investigation and submitted a technical report of the results. However, the scope of work performed was not sufficient to satisfy the requirement for full definition of the problem.

As the Navy continued with its IR Program, another eight sites were identified to have a potential for release of hazardous contaminants to the environment. Contaminants in the soil and groundwater have been found at many of these sites. Because of its waste handling and disposal practices, this facility is on the National Priorities List (promulgated on July 22, 1987) under CERCLA (Superfund).

On September 16, 1987, the Board adopted Cease and Desist Order (CDO) No. 87-125 for the Navy for failure to comply with the requirements of WDR Order No. 85-66, and violation of the Water Code and prohibitions of the Basin Plan. The CDO set out a time schedule for the Navy to investigate all of the sites identified and prepare interim and final cleanup plans. The time schedule was set based on experience dealing with other industries in similar situations, and was based in part on statutory requirements.

Discussion of Violations

The tasks accomplished since adoption of the CDO are summarized on Table 1. The Navy is currently in violation of Provisions B.1.b.(2) and (3), B.3.b, and B.1.a.(4) of the CDO. These provisions require submittal of potential vertical conduits reports, a Water Quality Solid Waste Assessment Test (SWAT) report, and a subsurface investigation report. Each of these violations are discussed in more detail below.

Potential Conduits

Provision B.1.b. requires the Navy to identify, evaluate, and close wells which may act as vertical conduits for contaminants to migrate from shallow to deep aquifers. The scope of identification is to locate all private and public wells. The purpose of evaluation is to determine the construction of the well (using methods such as downhole video surveys) to see if it may be a conduit, and if so, to allow design of appropriate closure procedures. Closure is the proper sealing of the well to prevent cross contamination of aquifers.

Provision B.1.b(2) requires the Navy to submit a report "which summarizes the results of field work conducted to evaluate potential conduits ..." identified in a previous report by June 30, 1988. Provision B.1.b(3) requires the Navy to submit a report "which describes well sealing or other effective measures which will be taken to prevent migration of pollutants to lower aquifers ..." by July 30, 1988.

The Navy submitted a report on January 13, 1988 that identified three types of potential vertical conduits: active wells, known abandoned wells, and suspected abandoned wells. The active wells are those which currently produce water (for agricultural uses). Of the abandoned wells, there are five wells for which locations are known, and 11 to 18 suspected locations for abandoned wells (based primarily on magnetometer surveys).

For the active wells, of which there are 4, the Navy has evaluated and submitted a report dated November 23, 1988 partially fulfilling Provision B.1.b(2). The Navy was not able to comply with the CDO for the abandoned wells because the scope of their original contract did not fully encompass all that would be necessary to actually locate the suspected wells. For example, several of the suspect locations (targets) where under runways which would necessitate tearing into the runway and repairing it after the search was completed. The Navy's original contract did not include these construction tasks.

To salvage the situation, the Navy restructured their contracts and now anticipates starting field evaluation of the known abandoned wells in about 2 months. This will occur simultaneously with locating the suspect wells. Each well will then be sealed shortly after evaluation on a well by well basis. The Navy anticipates completing all these activities around September 1989 with submittal of an evaluation report on October 15, 1989 and a final closure report on November 30, 1989. The scope of this closure report will surpass the scope of the closure report required under B.1.b(3) by describing how each well was sealed instead of how each well will be sealed.

SWAT Report for Landfills

Provision B.3.b requires the Navy to submit a SWAT report for the Runway Landfill (site 1) and the golf course landfill (site 2) by the California statutory date of July 1, 1988. The statute involved is Water Code Section 13273 which requires a SWAT report to determine whether there is leakage of hazardous waste from a disposal site. The Navy did not initiated field activities until May 1988. These activities were concluded in August 1988 for these sites (not counting continued sampling from monitoring wells).

If there is a reason for why the Navy failed to comply with B.3.b, it is that the Navy chose not to recognize the statutory deadline that makes Sites 1 and 2 special from the other sites. Instead, the Navy opted to investigate these two sites under the same program time frame for the other sites. They did however, initiate their IR program investigation at Sites 1 and 2 first at the request of Board staff. Another factor for the delay is that the first SWAT proposal submitted as required on December 15, 1987 was not adequate and had to be revised. This added 3 months to the process.

A private industry, or the Navy for that matter if they did not have any other sites, would have been able to complete the SWAT report by July 1, 1988. However, the Navy does have 15 other sites and has made a good faith effort into investigating all of them. It should be noted that when the CDO was issued, the compliance date for the SWAT was based on a statutory requirement. Therefore, the fact that this facility included 15 other sites could not be considered.

The Navy is currently evaluating the data and anticipates submittal of the SWAT report by March 30, 1989, nine months after the statutory date.

Report on Results of Investigation

Provision B.1.a(4) requires the Navy to "submit a technical report acceptable to the Executive Officer documenting completion of the necessary tasks identified in the technical reports submitted for Provisions 1.a.(1) and 1.a(2), above" for Sites 3 through 9, and 11 through 17 by November 15, 1988. The technical reports referred to are the Sampling and Analysis Plan (SAP), and the Quality Assurance Project Plan (QAPP) dated March 30, 1988.

Phase I field activities at these sites were begun in May 1988 and completed in November 1988 (not counting continued groundwater monitoring). The Navy has failed to submit the report required by Provision B.1.a(4). The Navy did however submit a report on December 15, 1988 in response to Provision B.9 of the CDO which required submittal of quarterly data reports. This quarterly report is somewhat in line with the B.1.a(4) report but falls short of satisfying the intent of B.1.a(4). For example, the quarterly report contains chemical analytical data for Sites 1, 2, and 9 only.

The Navy's plans are to go forth with the investigation roughly on a site by site approach. They intend to submit data to the agencies for review and input for a certain group of sites, then proceed with Phase II of the investigation for those sites (preliminary details of which were presented in the plans for Phase I). This is different than the CDO approach which requires submittal of one report of Phase I for all the sites together.

The Navy's approach may reduce the total time for completing Phases I and II because it will allow them to continue on with Phase II for some sites while evaluating and compiling the Phase I data for the other sites. This approach is reasonable and will result in reducing total time if the Navy compiles and presents the Phase I data for each site in an appropriate format for review by the agencies.

Discussion of Options

Since issuance of the CDO, the Navy has completed an enormous amount of work. They have installed about 70 monitoring wells, collected and analyzed over 450 soil samples, and performed soil gas surveys at five sites amongst other tasks. Phase II of the Navy's proposal calls for another 49 monitoring wells and 112 soil samples. I believe the Navy has put forth their best effort towards investigation of the problems at the facility (with the exception of the oversight in scoping the contract for the potential conduits). However, the Navy is in violation of four provisions of the CDO and will continue to miss most of the compliance dates in 1989 and 1990.

The Navy's legal position is that they are exempt under CERCLA Section 121(e) from having to comply with administrative requirements (e.g. time schedules) and need only comply with the substantive requirements (investigation and remedial action) under the CERCLA process. On a technical level however, the Navy has indicated that they will continue to try to address the requirements contained in the CDO.

Under the CERCLA process for a federal facility, the Navy must negotiate and enter into an Interagency Agreement (IAG) with the EPA for the investigation and remediation of all environmental problems at the facility. After resolution of a number of issues at the federal level, IAG negotiations were restarted between EPA and Moffett Field NAS in December 1988. The State (Department of Health Services, and RWQCB) was invited to participate in IAG negotiations and attended the first meeting. The next negotiation meeting is scheduled for January 10, 1989. One of the outcomes of the IAG will be an established time schedule for milestones (technical reports, specific cleanup actions, etc.), or specified criteria for setting milestones, similar to the intent of the CDO. It is through this process that the Navy prefers to address the Board's concerns.

The options for Board action are:

1. pursue further enforcement through referral to the Attorney General for failure to meet compliance time schedules,

2. amend the Cease and Desist Order with different tasks and less optimistic compliance dates, or

3. participate in IAG negotiations between EPA and the Navy.

The first option would be the most time intensive on the short term and would raise several legal issues regarding the enforceability of the CDO in this case.

The second option may appear to let the Navy off the hook but it does have merit. The Navy is well into the IR program and is in a much better position now than when the CDO was issued to discuss with us the approach of the investigation, and to justify the time that is necessary to carry out each phase. The result of taking this option is a time schedule more agreeable to both parties while at the same time holding the Navy to their commitment to address environmental problems.

Concerning the third option, EPA has taken the lead for negotiations with the Navy to reach resolution of issues toward a final IAG for this facility. Regional Board staffs' participation in the negotiations will help promote a spirit of cooperation and will help ensure that the IAG addresses all the Board's concerns.

Recommendation

Legal counsel does not recommend pursuing the first option. Both of the other two options will result in renegotiation with the Navy for a compliance time schedule different than the one in the CDO. Considering the requirements of CERCLA, the most appropriate option is to participate in IAG negotiations with EPA and the Navy. This is consistent with the approach taken for another federal facility the Board is involved with—Lawrence Livermore National Laboratory. However, should IAG negotiations stall, we will reevaluate and perhaps recommend to the Board at that time to take another action.

I also recommend amending the CDO, perhaps in 3 to 5 months, to reflect any aggreements made as part of the IAG negotiations. No changes to the CDO are proposed at this time because the Navy's justification for their anticipated task completion dates needs to be further evaluated.

In essence, the recommendation is that the Board take no action at this time and authorize the staff to participate in IAG negotiations with EPA and the Navy.

Concur: Wil Bruhns
Wil Bruhns, Senior Engineer

Concur: Wil Bruhns
for Steve Morse, Division Chief,
South Bay Toxics Cleanup

ATTACHMENTS:
Table 1 - Status of Compliance
Attachment A - Description of Sites

TABLE 1
STATUS OF COMPLIANCE WITH CDO NO. 87-125
NAVAL AIR STATION, MOFFETT FIELD

CDO Provision	Due Date	Actions
B.1.a (2) Submit technical proposal for investigation at Sites 11-16	12/15/87	*Navy submits, on 12/15/87, work plans for investigation at Sites 1-9 and 11-17 *RWQCB comments on plans by letter 1/26/88 *Navy submits revised plans on 3/30/88, 4/6/88, and 4/21/88 *RWQCB approves plans 5/6/88
(1) & (3) Initiate investigations at Sites 3-9, and 11-17	3/15/88	*Navy initiates field activities in May 1988
(4) Submit technical report on results of investigation	11/15/88	*Navy submits quarterly data report as required by B.9 on 12/15/88. This report does not satisfy the informational requirement of B.1.a(4)
(5) Submit proposal to further investigate Sites 3-9, and 11-17	11/30/88	(The second phase of the investigation was included in the plans required for the first phase. Adequacy of plans for the second phase will be determined upon review of information required under B.1.a(4))
B.1.b (1) Submit technical report identifying potential vertical conduits	1/15/88	*Navy submits report on 1/13/88
(2) Submit report summarizing results of field work to evaluate potential conduits identified under B.1.b(1)	6/30/88	*Navy submits report on 11/23/88 for active wells only which partially satisfies this requirement
(3) Submit report which describes measures to be taken to seal conduits evaluated under B.1.b(2)	7/30/88	
B.1.c (1) Submit report evaluating interim remedial alternatives at solvent tank #43	8/15/88	*Navy submits report on 8/17/88, report also includes action at other tanks

TABLE 1 (cont.)

CDO Provision	Due Date	Actions
B.2.a (1) Submit a Hydrogeological Assessment Report (HAR) for site 10	1/1/88	*Navy submits draft HAR on 12/31/87 *Navy submits final HAR on 3/30/88
B.2.b (1) Submit Report of Waste Discharge (ROWD) for Site 10	3/1/88	*Navy submits ROWD on 3/30/88
(2) Submit Closure Plan for Site 10	3/1/88	*Navy submits closure plan on 3/30/88
B.3. a. Submit a proposal for a Solid Waste Assessment Test (SWAT) for Sites 1 & 2	12/15/87	*Navy submits proposal 12/15/87 *RWQCB comments 1/26/88 *Navy submits final plan on 4/6/88 *RWQCB approves plan on 5/6/88 *Navy begins field work in May
b. Submit SWAT report	7/1/88	
B.6. Submit report indicating commitment to comply with CDO	10/30/87	*Navy sends letter dated 10/29/87 indicating their commitment to work with the agencies to respond to environmental problems at the facility
B.9. Submit monthly report on status of work	commence 10/30/87	First report submitted on 10/29/87. Reports received regularly but up to 1 week late.
and		
quarterly, the monthly report shall include data gathered	commence 6/15/88	Due to delay in starting field work, RWQCB staff agreed that report in June was not necessary so starting date was moved to 9/88. First quarterly report submitted 12/15/88.

ATTACHMENT A

DESCRIPTION OF SITES
NAVAL AIR STATION, MOFFETT FIELD

SITE 1 - RUNWAY LANDFILL

The runway landfill is an abandoned, unlined landfill that was used for disposal of refuse, scrap equipment, and hazardous wastes from the early 1960's to 1978. The total volume of hazardous waste, including solvents, paints, thinners, oil, and PCBs, disposed at this site was estimated to range from 75,000 to 150,000 gallons. This site is in the City of Sunnyvale and is on the upgradient edge of the Leslie Company evaporation ponds in the bay wetlands.

SITE 2 - GOLF COURSE LANDFILL

The golf course landfill is an abandoned, unlined landfill that was in operation from the 1940's to the early1960's. Little information is available on the types or quantities of waste which were disposed at this site. However, this site was reportedly used to the same degree and received the same types of hazardous wastes as the runway landfill (site 1). A golf course was constructed over the landfill by filling the area using soil from offbase.

SITE 3 - MARRIAGE ROAD DITCH

Marriage Road ditch was constructed prior to 1947 and received hazardous waste dumped into storm drains in and around Hangars 1, 2, and 3 until the 1970's. In addition, hazardous waste was also directly disposed of into the ditch. The ditch runs northward from the Hangars to the northern boundary of Moffett Field, and at this point the drainage water is pumped to a perimeter canal south of the evaporation ponds which leads to Guadalupe Slough. An estimated 150,000 to 750,000 gallons of hazardous waste, including waste oils, solvents, fuels, detergents, paints, and hydraulic fluids, were disposed into the storm drains which lead to the ditch.

SITE 4 - FORMER INDUSTRIAL WASTEWATER SURFACE IMPOUNDMENTS

The former industrial wastewater surface impoundments, locate immediately west of the existing ponds, were unlined and received approximately 15 million gallons of wastewater from aircraft washing, equipment maintenance, and operations in Hangars 2 and 3 from 1968 to 1978. The wastewater was held in the ponds, treated and discharged to the sanitary sewers. As much as 35,000 gallons of hazardous materials, including solvents, paint sludge, fuels and oil, may have been discharged to the ponds directly and in the wastewater.

SITE 5 - FUEL FARM FRENCH DRAINS

The Site 5 fuel farm was the main fuel facilities for Moffett Field from the 1950's to the 1960's. Water and fuel were pumped into French drains during routine tank drainage. The exact location of the drains and the quantities of fuel dumped in the drains are unknown. The Navy has estimated that as much as 28,000 gallons of fuel could be present on top of the groundwater at the site, based on observations of fuel levels in wells.

SITE 6 - RUNWAY APRON

The runway apron disposal site is located adjacent to the former aprons north and east of Hangar 3. The site was paved over in 1979 during enlargement of the apron. It is estimated that 120,000 to 600,000 gallons of hazardous waste from aircraft maintenance, including solvents, oils, fuels, and paints, were disposed of at this site from the 1940's to the 1970's.

SITE 7 - UNPAVED AREAS SURROUNDING HANGARS 2 AND 3

Site 7 consists of Hangars 2 and 3 and the unpaved areas surrounding the hangars. From 1942 until 1978, hazardous waste that accumulated in the unpaved areas surrounding the hangars flowed through deck drains to the Marriage Road ditch. Unpaved areas at each corner of the hangars were used to dispose of an estimated 120,000 to 600,000 gallons of hazardous waste including solvents, paints, oil, and fuel. A power plant shop in the northeast corner of hangar 3 disposed of solvents down deck drains and an unpaved areas around hangar 3.

SITE 8 - WASTE OIL TRANSFER AREA

Site 8 consists of a 5,000 gallon waste oil tank that was in use from the 1940's to 1980. Waste oil was disposed of into a sump located adjacent to the tank and then the oil would be transferred into the tank. The tank reportedly also received about 100 gallons per year of transformer oil, possibly containing PCBs, and 200 gallons per year of solvents. Oil was also reportedly spilled onto the ground around the sump during oil transfer.

SITE 9 - OLD FUEL FARM

The site consists of a number of underground fuel tanks (six 10,000 gallon steel tanks and two 5,000 gallon steel tanks) which were in use from the 1940's to 1964. Spillage occurred when filling the tanks and in the mid-1960's two of the 10,000 gallon tanks began leaking and they were never repaired. In 1964 the fuel farm was abandoned and the tanks were filled with water.

SITE 10 - ACTIVE INDUSTRIAL WASTEWATER SURFACE IMPOUNDMENTS

The active industrial wastewater surface impoundments were constructed in 1975 to replace the former impoundments (site 4). The impoundments, separated by a levee, consist of two unlined earthen basins with a storage capacity of 400,000 gallons. They are approximately 10 feet deep and 60 feet in diameter. The ponds receive wastewater from the washracks and cleaning racks associated with hangars 2 and 3. The wastewater entering the ponds either percolates or evaporates except during peak wet weather flow when it is pumped directly to the sanitary sewer.

The Navy is currently investigating another area that they refer to as Site 10. This area is called Chase Park Area (and runway) and does not include the active impoundments which the Navy is investigating under different program. The Chase Park Area encompasses the runway and an area southwest of the runway on which many of the tanks identified under Sites 14 through 17, below are located.

SITE 11 - ENGINE TEST STAND AREA

This area is used to test repaired engines under power. A channel that has been cut in the concrete pad of the test area conveys collected waste to the south edge of the pad and onto soil. A large oil stained area of soil was reported in a technical report. This practice is ongoing; however, steps have been taken to reduce or eliminate future spills.

SITE 12 - FIREFIGHTING TRAINING AREA

A 100 by 200-foot area containing a dummy aircraft fuselage is periodically set on fire by igniting waste fuel. The fires are extinguished by fire crews as part of their training. The surface area is covered by compacted gravel which allows waste fuel, firefighting chemicals, and polluted water to percolate into the ground.

SITE 13 - EQUIPMENT PARKING AREA

Industrial waste generated from leaks and spills of oil and hydraulic fluids and from maintenance activities is collected and routed to an unlined, surface storm drain east of building 142. Stained soil and standing oily waster has been reported in the storm drain.

SITES 14 THROUGH 17

The CDO identified 68 other tanks and sumps which are used to store and/or treat raw hazardous materials and hazardous wastes. Some are abandoned. Some are inactive and have been removed. Most are active. They were classified in the CDO as follows:

Site Number	Description
14	40 Motor Fuel and Diesel Fuel Tanks
15	10 oil and Waste Oil Tanks, and Oil/Water Separators
16	13 Other Tanks and Tanks of Unknown Previous Use
17	5 Solvent and Other Hazardous Waste Tanks/Sumps

The site numbers for these tanks and sumps have since been changed. Many of the tanks are located near or on other sites and will be investigated as part of that other site. Those that are not, or have been selected by the Navy for separate investigation, are designated as follows:

Revised Site Number	Description
14	Abandoned Tanks Nos. 19, 20, 67, and 68
15	Sumps and Oil/Water Separators Nos. 25, 42, 54, 58, 59, 62, 63, 64, and 65
16	Public Works Steam Rack Sump No. 60
17	Paint Shop Sump No. 61
18	Dry Cleaners Sump No. 66
19	Leaking Tanks Nos. 2, 14, 43, and 53