



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

215 Fremont Street
San Francisco, CA 94105

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MOFFETT FIELD
SSIC NO. 5090.3

MAY 16 1989
MED. SEC.

16 MAY 1989

Commander, Western Division Naval
Facilities Engineering Command
Attn: Kathy Nakazawa, Code 1811KN
P.O. Box 727
San Bruno, CA 94066-0720

Dear Kathy:

Please find enclosed the Environmental Protection Agency's comments to the Phase II Proposals for Sites 3, 5 and 9 at NAS Moffett Field. In general we concur with the use of screening tools to determine the location(s) of wells. We believe that screening tools will help meet your project objectives by maximizing field efforts with the placement of "smart holes".

However, as stated in our general comments, work to be performed should be discussed in a specific section, addendum or by reference to the Sampling Plans, QAPP and the Health and Safety Plan to assure compliance with established protocol. Specifically the Data Quality Objectives (DOQ) and analytical protocol for the fast turn around of groundwater samples as well as the sampling protocol from the hydropunch should be discussed.

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)
Department of Health Services (Don Cox)
Metcalf & Eddy (Don Turner)

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EPA Comments to Proposed Phase II Work
Sites 3, 5, and 9, NAS Moffett Field

General

1. The Phase II work as agreed upon by the regulatory agencies will require its incorporation by either addendum or by reference to the existing sampling, QA/QC Plans and the Health and Safety Plan to assure compliance of established protocol.

2. Water samples from the hydropunch will be turned around in 48 hours. Other than fast turn around the proposal did not indicate any variance with the QAPP analytical protocols. The proposal also did not discuss sampling methodology from the hydropunch. Does the Sampling and Analysis Plan (March 30, 1988) adequately cover the sampling protocols from the hydropunch?

Specific Comments

A. Site 3.

1. Page 3, Section 4.1, Paragraph 3. The stated difference in head of up to 1.8 ft should be clarified. It assumed that the head in the B aquifer is up to 1.8 ft higher than that in the A aquifer at Site 3.

2. Page 4, Section 4.2, Paragraph 2. The statement that the occurrence of these chemicals in soil and water does not indicate the soil contamination as a source of groundwater contamination is questionable since the six listed compounds have been detected in both the soil and groundwater.

3. Pages 4 and 5. A summary table showing chemicals detected in samples for soil and groundwater above or below detection limits (MDL) would be useful. The table should also show the MDLs for those chemicals detected but unquantifiable. Summary tables of analytical results would prove equally useful for Sites 5 and 9.

4. Page 5, Section 4.3, Paragraph 3. See previous comment (2). Both soil and groundwater contained 1,2-Dichloroethene, Toluene, and Tetrachloroethene, suggesting that discharges in the Marriage Road Ditch may at least in part have contributed to soil and groundwater contamination.

5. Page 5, Paragraph 4. The comment that bis-2 phthalate is an ubiquitous contaminant requires some clarification. The fact that it was detected in soils in thousands of ppb would suggest a source other than sampling or laboratory handling.

6. Page 6, Section 4.4. See comment 3.

7. Page 8, Paragraph 4. It is assumed that perhaps more than one cone penetrometer test (CPT) will be required to properly locate the proposed monitoring wells near Marriage Ditch Road, assuming that the initial CPT does not show sand layers in the A zone. Considerations for electrical resistivity surveys should also be given for the identification of shallow channelized sand/gravel deserts which may afford the primary routes for contaminant movement in the A and/or B Zone.

B. Site 5.

1. See comment 3, Site 3.

2. Page 2, last paragraph. Location of French drains identified in Figure 1, not Figure 2.

3. Page 7, last paragraph. It would be helpful to show the location of the 5000 gallon spill on figure 1 in order to relate the proposed work to the spill site.

4. Page 8, Section 5.1.3. Fifteen CPT and Hydropunch locations are proposed for Plume P-2, yet only nine CPT/Hydropunch locations are shown in Figure 1. The additional six locations should be identified in the figure.

5. Page 8, Section 5.1.4. seven CPT/Hydropunch locations and two soil borings are proposed for Plume P-3. Figure 1 shows six CPT/Hydropunch locations and no soil borings. All locations should be shown in Figure 1.

C. Site 9.

1. Page 7 Section 5.1, Line 5. Statement "from the and A aquifer" is incomplete.

2. Page 8, Section 5.1.1, paragraph 1. See Comment 7, Site 3.

3. Page 9, Paragraph 2. It was reported on page 5, that a large quantity of fuel may have been lost from Area 9A (Old Fuel Farm). The work plan, however, does not provide for the possible need to install a free product monitoring wells at this or other buried tank locations where fuels may have leaked into the subsurface.

4. Page 10, Section 5.1.3. The criteria for locating soil borings as shown on figure 2 is not clear. It would be reasonable to locate such borings at suspected points of contaminant release or at points where maximum levels of contaminants were detected in soil vapor.