

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
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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 3, 5, and 9 at NAS Moffett Field.

Dear Kathy:

We concur with all of EPA's comments on the above proposals particularly the one regarding the Hydropunch sampling protocols. Below are the Board's comments in addition to those you've received from EPA:

General

1. Since the CPT Hydropunch will play an important role in determining whether further investigation of an area is warranted, some check on the validity of the information gathered is necessary before field decisions are made. We suggest that several (at least 3 to 5) CPT Hydropunch be run next to existing A wells which show groundwater contamination or traces of contamination. The soil type and groundwater information should be compared to the information from the monitoring well to provide preliminary verification of the degree of correlation of the information.

Site 3

1. Section 5.1, 2nd paragraph, p. 7

It is unclear which standards or beneficial uses are being referred to. Criteria used to determine beneficial use are contained in the Water Quality Control Plan, San Francisco Bay Basin (Basin Plan). Based on current groundwater quality data, potential beneficial uses for the shallow groundwater at site 3 are agricultural supply, and industrial process and service supply. Also, in the southern portion of site 3, in the vicinity of W3-1(A), potential beneficial use may include drinking water supply.

The reference to "levels set to protect marine water life (Marshack, 1987)" are inappropriate at this time. The primary purpose of those levels is for classification of designated wastes for disposal to a

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hypothetical Class II waste management unit. At this stage, the only baseline that should be use for comparison of groundwater quality data is background (i.e. the groundwater quality prior to effects from waste disposal operations by NAS Moffett Field).

Site 5

Section 5.1.1, French Drain (northern area), p.7

1. The proposal specifies that there will be four Hydropunch sampling locations, and "the Hydropunch will be used to collect two groundwater samples." Does this mean that there will be a total of eight groundwater samples collected using the Hydropunch apparatus; one at the water surface for free product and one deeper for dissolved constituents?
2. Monitoring wells should be specified for this area if data from the Hydropunch samples indicate dissolved constituents or if free product or oil saturated soils are found.

Section 5.1.5, Tank 26, p. 8

3. The statement that "no chemical contamination was found" in well W5-6A is incorrect. The sample collected on 11/03/88 from this well showed 16 ppb of acetone and 300 ppb of TPHC. In any case, if the intent of collecting data from the CPT Hydropunch locations is "to determine if the tank [26] has leaked," then at least one of the downgradient Hydropunch locations should be as close as possible to the tank instead of the 100 feet distance shown on Figure 1.

Section 5.2.1, French Drain (southern area), p.9

4. If the investigation finds a significant quantity of fuels in the area, more than one A zone monitoring well may be necessary. The proposal should allow for that contingency.

Section 5.2.3, Tank 8 and 9, p. 10

5. It is suggested that at least one downgradient Hydropunch sampling location be as close as possible to each tank to help determine if either tank is leaking.

Site 9

Section 5.1.4, Pumping Tests, p. 11

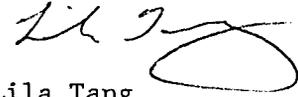
1. Page 5-27 of the March 1988 Sampling and Analysis Plan specifies one test each of the A and B1 aquifers as opposed to the two A aquifer tests discussed in the proposal.

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

Sincerely,



Lila Tang
Case Engineer

cc: Lewis Mitani, EPA
Don Cox, DHS

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