

DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM  
2151 BERKELEY WAY, ANNEX 9  
BERKELEY, CA 94704



August 8, 1990

Mr. Stephen Chao  
Department of the Navy  
Western Division Naval Facilities  
Engineering command  
900 Commodore Way, Building 101  
San Bruno, CA 94066-0720

Dear Mr. Chao:

SITE 14 FUEL STORAGE AREA DRAFT ACTION MEMORANDUM, NAVAL AIR  
STATION MOFFETT FIELD

Please find enclosed the Department of Health Services' (DHS) comments to the Site 14 Fuel Storage Area Draft Action Memorandum. DHS concurs with the Environmental Protection Agency's comments found in their 1 August 1990 letter, and therefore, to avoid duplication has not included similar comments. If you have any questions regarding this letter, please call me at (415) 540-3818.

Sincerely,

*Lynn Nakashima*

Lynn Nakashima  
Associate Hazardous Materials  
Specialist  
Region 2  
Toxic Substances Control Program

Enclosure

cc: Lewis Mitani  
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Comments to Site 14 Action Memorandum  
Fuel Storage Area, NAS Moffett Field

1. Page 14, Paragraph 2, last sentence  
VOCs were detected in soil borings (e.g. 8 ppb 1,1,1-TCA, W14-4(A), 3 feet, on 7/28/88). The text should be revised.
2. Figure 3  
SB-14-2 is not located on this map.
3. Page 16, Section 2.3.3, paragraph 5  
Previous studies have shown that on 10/4/88 well W14-4(A) contained 10 ppb TCE and well W14-2(A) contained 160 ppb 1,2-DCA. Revise this paragraph to indicate that VOCs are present in the "A" aquifer.
4. Page 22, Section 2.4.2, paragraph 2  
0.7 ppb benzene was detected in monitoring well ERM-2. Please revise the text.
5. Page 25, Section 3.2, paragraph 2, sentence 3  
Please explain in more detail the statement that the contamination at Site 14 appears to be "isolated" from the regional plume.
6. Page 33, Section 4.1.2.2, paragraph 2, last sentence  
Caps also need to be sloped sufficiently so that ponding does not occur.
7. Page 41, Section 5.1, paragraph 2  
Because VOCs were also detected in the "A" aquifer, those chemicals should also be used in the screening evaluation.
8. Page 49, Section 6.0  
Although the VOC contamination in the groundwater may not be addressed in this Action Memorandum, they may be a constituent in the extracted groundwater. Therefore, all removal action alternatives should be evaluated for those chemicals detected to ensure that they can be adequately treated.
9. Page 52, Section 6.2.3, paragraph 2  
A map showing the possible locations of the extraction wells should be included.
10. Page 53, paragraph 3  
Ideally PVC screens should not be used if free product is suspected in the groundwater because of possible degradation of the PVC. Stainless steel screens are preferable.

11. Page 53, paragraph 5  
A contingency plan needs to be developed in the event that the discharge water cannot be disposed of at the local POTW.
12. Table 10  
Was the cost to analyze and/or dispose of drill cuttings and purge water considered in the cost analysis?
13. Page 71, paragraph 3  
An explanation of what will occur after the 60 days of pumping should be described.