

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

August 23, 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:

REMOVAL ACTION PLAN FOR PHASE II TANK REMOVALS, NAVAL AIR
STATION, MOFFETT FIELD

Please find enclosed the Department of Health Services' (DHS)
comments for the Phase II Tank Removal Action Plan. If you have
any questions please call me at (415) 540-3818.

Sincerely,

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

Enclosure

cc: Lewis Mitani (H-7-3)
U.S. EPA, Region 9
1235 Mission Street
San Francisco, CA 94103

Wil Bruhns
Regional Water Quality Control Board
S.F. Bay Region
1800 Harrison Street, Suite 700
Oakland, CA 94612

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CDM Federal Programs Corporation
301 Howard Street, Suite 910
San Francisco, CA 94105

ADMIN RECORDED.

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D/N 09

COMMENTS TO REMOVAL ACTION PLAN
PHASE II TANK REMOVALS
NAS MOFFETT FIELD

1. Page 4, section 2.1, paragraphs 2 and 3: It is not clear why these two paragraphs are discussed in this section. Section 2.1 is a description of Site 9, while Tanks 51 and 52 are suspected to be within Site 10.
2. Page 6, section 2.3, paragraph 2, first sentence: Typo-change cyclophetane to cyclopentane?
3. Page 10, section 3.2.2, paragraph 2: Please contact the San Francisco Regional Water Quality Control Board to obtain the updated version of "Regional Board Staff Recommendations for Initial Evaluations and Investigations of Underground Tanks."
4. Page 10, section 3.2.2, paragraph 3: The 1000 ppm TPH value may serve as a preliminary tool in characterizing site contamination; however, regardless of whether the TPH concentration is above or below 1000 ppm, the waste should be evaluated against all applicable Title 22, CAC, Article 11 criteria, and further analytical work should be performed to properly classify the waste. In addition, the threshold value was not meant to be applied to diesel, but rather only to gasoline.
5. Page 13, section 4.1: (a) A water sampling section should be added in the event that groundwater is found in the excavated pit. (b) A section should be included that describes how sumps will be abandoned.
6. Page 13, section 4.1.2, paragraph 1 and Page 17, section 4.2.2, paragraph 1: Analyses should also include PCBs and any tank or sump suspected to have received paint should be tested for mercury.
7. Page 14, first complete paragraph: The rinsate should be analyzed for the same chemicals that were detected in the liquids contained in the tanks.
8. Page 14, section 4.1.5: Soil sample locations should be determined based on the Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks.
9. Page 15, section 4.1.7: Backfill should be analyzed for all chemicals detected in the tank, and not just for TPH and BTEX.
10. Page 18, section 4.2.6, paragraph 1, sentence 3: All excavated soil must be analyzed by a State Certified Laboratory for all chemicals suspected or known to have been contained in

the tank before the soil may be considered to be suitable for fill material.

11. Page 18, section 4.2.6, paragraph 1, sentence 4: Describe how background levels will be determined.

12. Page 18, section 4.2.6, paragraph 2: A plastic liner or some other marker should be placed into the pit prior to backfilling so that the extent of excavation can be determined if the need should arise in the future.

13. Page 19, paragraph 2, sentence 3: The ends of the brass tubes may not be sealed with electrical tape as cross contamination may occur.

14. Page 23, last paragraph: If groundwater monitoring associated with the RI/FS will not adequately characterize groundwater contamination, additional monitoring wells will have to be installed. The locations of existing wells and proposed wells for the RI/FS should be presented in this plan. In addition, the need for additional wells should be identified and factored into the final cost.