

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
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Commander
Western Division
Naval Facilities Engineering Command
Attn: Stephen Chao, Code 1813SC
900 Commodore Way, Building 1012
San Bruno, CA 94066-072

Dear Mr. Chao:

This is in response to three recent submittals by the Navy. These include a February 28, 1991 Site 8 action memorandum, a March 1, 1991 Site 9 action memorandum, and a March 19, 1991 soil piles characterization plan. Our comments are:

SITE 8

Page 17, second paragraph. It states here that certain organic compounds found in soil, i.e. acetone, methylene chloride, and MEK, may be associated with sampling and/or analytical method contamination. Before dismissing data a quantitative comparison of concentrations in samples and in various QA/QC blanks needs to be made and only samples with a similar range of concentrations as shown in the blanks should be eliminated.

Page 17, last paragraph. This references the metal background data contained in the draft Phase I Characterization Report. This part of the Characterization Report was extensively commented on by the agencies and is currently being revised. Any comparison of data in this Site 8 Report with conclusions of the Characterization Report should await finalization of the Characterization Report. At this time the Characterization Report should not be used to define background concentrations.

Page 28, first paragraph. This paragraph concludes that the solvent plume from this site may not be as areally extensive as suggested by the Hydropunch data. This is based on the fact that data from one well-Hydropunch pair did not have strong agreement and the fact that equipment blanks were not collected for Hydropunch samples. (Note that another well-Hydropunch pair, WB-5(A2) and CPT/H8-17, showed the same four chemicals and three of the four concentrations were very similar). We believe this conclusion is inappropriate and that the Hydropunch data should be considered valid until shown otherwise.

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TRAN 4T

Page 28, second paragraph. This refers to the background water data contained in the Characterization Report. Our comment is the same as for page 17, last paragraph.

Page 28, third paragraph. This paragraph concludes that the plume is defined, however different aquifers were used to reach this conclusion. The A2 aquifer was used for lateral definition and the A1 for downgradient definition. There does not appear to be lateral definition of the A1 or downgradient definition of the A2. Also, the Hydropunch data indicate that the plume is not defined.

Page 31, first paragraph. This states that the A2 aquifer is not a potable aquifer. This Board has defined potential sources of drinking water as those aquifers which have a TDS of less than 3000 ppm and are able to be pumped at a sustained rate of 200 gallons per day. Any conclusions of whether an aquifer is a potential source of drinking water should be made in comparison to our definition. This definition is part of our Basin Plan and we therefore consider it an ARAR.

Page 31, last paragraph. Our position is that chemicals in groundwater are a source for further migration. Therefore we believe that interim control measures to prevent further migration are appropriate.

Page 32, first paragraph. We concur that interim measures are not intended to be a final solution for groundwater remediation. We also concur that area wide remedial measures may be more efficient. However, we do not believe that source control should be limited to removal actions. As noted above preventing the further migration of contaminated groundwater is also an appropriate interim action.

SITE 9

Page 33, last paragraph. See comment for Site 8, page 17, last paragraph regarding background data from the Characterization Report.

Page 41, fifth paragraph. See comment for Site 8, page 17, second paragraph regarding sampling and analytical contamination of samples.

Page 47, second paragraph. The 1985 Regional Board document referred to has been superseded by 1990 recommendations for dealing with leaking underground tanks. Also, the 100 ppm concentration is for total petroleum hydrocarbons, not xylenes or any other single constituent.

Page 49, last paragraph. See comment for Site 8, page 31, first paragraph, regarding defining the A aquifer as a potential source of drinking water.

Page 56, Table 11. We would like to make it clear that the TTLC and STLC concentrations from Title 22, CCR, are only intended for waste definition purposes. They are not environmental cleanup concentrations. These concentrations presume the waste will be disposed of in an appropriately lined landfill and therefore just because a waste is determined to be non-hazardous under these criteria does not mean it can remain uncontained and uncontrolled in the environment. Also on this Table the 100 ppm TPH is listed as a cleanup goal. This concentration is not a cleanup goal. It is intended only to prioritize sites requiring cleanup. Finally, our understanding of Proposition 65 is that it uses MCLs when available, and the one in a hundred thousand cancer risk when not available, when dealing with potential sources of drinking water. Therefore the concentrations in the MCL and Prop 65 columns should be the same for carcinogens.

Page 79, third paragraph. This paragraph presents arguments for eliminating soil vapor extraction as a source control technology at this site. We have found SVE a very successful method of remediation at cleanup sites in the Bay Area and would like to respond to each of the three arguments separately.

1. This uses soil data from Site 14 South to conclude that the soil at Site 9 is too impermeable for SVE. No information is given to show that the soils at the two sites is similar. Also, this argument is partially contradicted by the second argument.
2. This states that the soils are highly heterogeneous and preferential pathways would be formed through more permeable units if SVE were used. While this is true in general, it is possible to design a system to deal with this in some cases. Also, the more permeable soils can also be a preferential pathway for chemicals and if the chemicals are still present in these types of soils it would be appropriate and feasible to remove them.
3. The third argument is that the lighter components of fuels have likely already been removed from the soil by natural processes and SVE is not appropriate for the heavy components of fuel. No data is presented to show that the lighter components are actually gone. Also, at the beginning of the paragraph it states that SVE is appropriate for removal of VOCs at the site.

We believe the conclusion to eliminate SVE from further consideration should be re-evaluated in response to these comments.

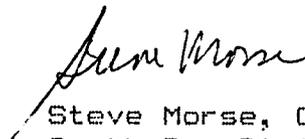
Appendix F. In the Table for action specific ARARs the following should be added: For discharges to State waters, either surface or groundwaters, the applicable statute is the Porter-Cologne Water Quality Act, California Water Code and Division 3 of Title 23 CCR; For land disposal Chapter 15 of Title 23 CCR (pursuant to the California Water Code) and Chapter 30 of Title 22 CCR (pursuant to the California Health and Safety Code) are applicable.

SOIL FILES CHARACTERIZATION

This report is acceptable to Board staff.

If you have any questions please call Wil Bruhns at 415-464-0838.

Sincerely,



Steve Morse, Chief
South Bay Division

cc: Lewis Mitani, EPA
Cyrus Shabahari, DHS-TSCD
Tom Iwamura, SCVWD
Lee Esquibel, SCCHD
Russ Frazer, City of Mountain View

Admin Record