

TIN MARQUETTA ENERGY SYSTEMS, INC.

POST OFFICE BOX 2003
OAK RIDGE, TENNESSEE 37831

April 23, 1991

Steven Chao
NAVFACENGCOM WESTDIV
900 Commodore Drive
San Bruno, California 94066

Dear Steve:

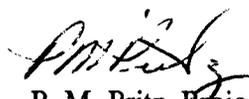
Responses to the Department of Health Services March 8, 1991, Comments to the February 1991 Quarterly Report, Naval Air Station Moffett Field, California

Attached are International Technology Corporation's approved responses to the comments received (March 8, 1991) from Mr. Cyrus Shabahari (California Department of Health Services) on the February 1991 Quarterly Report for the Naval Air Station Moffett Field, California, Remedial Investigation.

We hope that these responses are satisfactory and trust that you will forward them to Mr. Shabahari.

If you have any questions, please contact me directly at 615-435-3203.

Sincerely,



P. M. Pritz, Project Manager
Hazardous Waste Remedial Actions Program

PMP:cab

Attachment

cc: C. K. Bradley (IT)
D. B. Jones
A. L. Porell
T. E. Sturdivant
File RC-0996

1093

NAVAL AIR STATION MOFFETT FIELD
FEBRUARY 1991 QUARTERLY REPORT

Responses to March 8, 1991 Department of
Health Service Comments

1. Scales for the individual site maps (Figures A-3 to A-6) have been established to encompass the subject site and to allow for adequate resolution of sampling locations and site detail. For example, if Site 14 was on the same scale as Site 9 the soil boring locations would be too cluttered. This detail is presented to allow the reader to see accurate sample locations. Please refer to the Phase I Characterization Report for a presentation of station-wide data; Appendix E maps might be particularly useful.
2. The extent and configuration of chemical contamination on the west portion of NAS Moffett Field is presented in the chemical contour maps included in the Quarterly Report. The contour maps are intended to present observations rather than expected results; that is, the contours are drawn to reflect observed contaminant configurations rather than the configuration that would be expected due to known tank or pipeline leaks. Groundwater flow direction was also considered in drawing the contours.

Knowledge of potential sources of contamination is critical in producing investigation plans. In the case of Moffett Field the Work Plan and, later, the Phase II Work Plan were based on available knowledge of the tanks. Tank investigation is, as you know, still ongoing.

Likewise, knowledge of contamination sources is fundamental to evaluation of data. It is not, however, necessary for presentation of the data as has been done in the Quarterly Report. In fact, it was this kind of data presentation of the Phase I soil gas data in the Phase II Work Plan that first identified several potential sources within Site 9 (areas 9C, 9D, 9E, and 9F).

Please see the Phase I Characterization Report for an evaluation of the Phase I data as it relates to known or inferred sources and a description of the investigation activities. The investigation activities are further discussed in the 1988 Work Plans and the 1989 Phase II Work Plan. The Phase II data will also be evaluated in relation to contamination sources in the Operable Unit Report.

3. No current data are available upgradient of the site area depicted in Figures A-8 and A-9. The most recent data upgradient of that area was collected in 1987 by the MEW companies and was reported in the MEW RI Report. Subsequent quarterly sampling rounds will include additional MEW wells in the south end of the station to provide the upgradient data needed to resolve the TCE contours. That data will, of course, be provided in the appropriate Quarterly Reports.

4. The reasons for the TCE fluctuations are unclear at present. There is no current use of TCE to account for TCE fluctuations as spill events. It is possible that seasonal hydrologic patterns or storm events are responsible for the fluctuations, although that cannot be concluded at this time. Additional sampling periods will add data that will allow a more thorough evaluation of temporal contamination trends. A complete evaluation of the data will be provided in the Operable Unit Report.
5. The relationship of W9-19(A1) to W9-2(A1) is unclear at present. The 5,000 ppb contour that includes W9-2(A1), W9-18(A1), and W9-38(A1) may reflect an area of higher transmissivity (lateral) from a relict stream channel; the MEW plume may follow such a transmissive channel. Other possibilities include multiple Navy sources or a combination of multiple Navy sources plus the MEW plume. The results of the next quarterly sampling may clarify the relationship between the wells.
6. Interpretation and evaluation of data are not presented in the Quarterly Reports. Certain wells were, however, selected for histograms to graphically portray the change in contaminant concentrations since June 1990. The histograms and criteria for selection are presented in Section 2 of the Quarterly Report. The well selected for representation in the vicinity of W9-28(A2) is W9-20(A2).