



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, Ca. 94106

1 May 91

Mr. Stephen Chao  
Naval Facilities Engineering Command  
Western Division, Code 18  
Office of Environmental Management  
900 Commadore Drive, Bld. 101  
P.O. Box 727  
San Bruno, CA 94066-0720

Dear Mr. Chao:

Please find enclosed the Environmental Protection Agency's comments to Naval Air Station Moffett Field North Base Area Investigation Work Plan, April 1991.

If you have any question please contact me at (415) 744-2412.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lewis Mitani".

Lewis Mitani  
Remedial Project Manager

enclosure

cc: Distribution List

ADMIN RECORD

1106

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## EPA Comments on the North Base Area Investigation Work Plan

### 1. Page 1, Section 1 Introduction.

The primary purpose of the proposed work is to extend the URS Consultants, Inc. work eastward onto NAS Moffett Field (NASMF) property to cover an unsampled area between the NASMF/NASA boundary and NASMF's W01 wells. Although confirmation of the earlier work would be useful, the objective of this work plan is to fill data gaps on NASMF property.

### 2. Page 3, Section 1.2 Draft Work Plan Organization

The QAPP referenced here was written assuming fixed-base analysis. This document should indicate if the same QA/QC level will be met on the on-site laboratory. If not, specific procedures should be presented.

### 3. Page 23, 1st paragraph.

It is recommended the mobile laboratory check for fuels, or fuel indicator chemicals. Fuel related chemicals have been found on both NASA and NASMF wells and it would be useful to determine if such contaminants have reached the bay or wetlands.

### 4. Page 23, 2nd paragraph.

This paragraph states the density of samples in some areas may be reduced and gives an example. Because circumstances such as the nature of the hydrogeology in the area, it is strongly recommended the areas shown on Figure 13 be sufficiently covered with hydropunch samples.

As an example if points 37, 38, 39, 46, and 48 are all non-detect, a decreased number of hydropunch points may be justified; however adequate sample coverage of the should be achieved.

Samples 47-49 provided needed information regardless of whether the analysis of one or more samples shows non-detect. If contamination is found in 43, 44, and/or 49 provisions should be made to take samples northeast toward the W01 wells. If the sample points presented in figure 3 is reduced, are there provisions to move sample points northeast toward the W01 wells?

5. Page 24, figure 24

This figure shows a gap between Zook Road and hydropunch points 38, 39, 46, and 47. No explanation is given for this gap. The gap seems to leave room for questions on the contamination in the area.

6. Page 26, Section 4.3.1 Decontamination Procedures

Region IX protocols for sampling equipment require the listed bulleted items after each use, not only when floating product is encountered.

7. Page 39, Table 1

This table contains definitions of the superscripts a, b, and c but the table itself does not contain a, b, c.

Editorial note, Method 601 analyses for trans-1,2-DCE but it is not shown on the table.

Not being analyzed for with Method 601 is cis-1,2-DCE. To be consistent with data presented in the URS document (Northern Plume Boundary Groundwater Sampling Report, January 1991), total 1,2-DCE or cis-1,2-DCE must be analyzed for in this investigation.