

DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM  
700 HEINZ AVE., BLDG. F, SUITE 200  
BERKELEY, CA 94710-2737

N00296.001136  
MOFFETT FIELD  
SSIC NO. 5090.3



May 29, 1991

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:

**Moffett Field Naval Air Station (NAS) Site 9, Action Memorandum and Building 29 Technical Memorandum**

Please find enclosed the Department of Health Services' (DHS) comments to the Site 9 Action Memorandum and Building 29 Area, Field Investigation Technical Memorandum.

Should you have any questions, please call me at (415) 540-3821.

Sincerely,

A handwritten signature in black ink that reads 'Cyrus Shabahari'.

Cyrus Shabahari  
Waste Management Engineer  
Site Mitigation Branch  
Region 2  
Toxic Substances Control Program

cc: See attached Distribution List

1136

D/N18

General Comments:

1. It is evident that the underground storage tanks (UST) around building 29 are not fully investigated. It is therefore, important to initiate the needed investigation. The results could provide crucial information and contribute to the remedial design. Please state how the additional field activities will be undertaken to characterize the site further.
2. Both documents fail to provide a contour map of the contamination. The data gathered from the previous investigations could be utilized into a three dimensional contour map.
3. The documents focus the groundwater removal only on A1 zone. However, the contamination has appeared in both A1 and A2 zones. Furthermore, it is not clear how the aquifer zoning will affect the removal design and hence, the remedial action. Please provide an explanation.
4. The documents fail to discuss the soil remediation at buildings 81 and 31. The provided data show copious signs of soil contamination at both areas. Please provide an explanation.
5. The documents identify and propose the wells to extract the groundwater and treat approximately 4.4 million gallons of contaminated groundwater. It is not clear how the groundwater volume was estimated. And secondly, which downgradient wells will be chosen to ascertain the progress.

Specific Comments:

Building 29 Area, Technical Report

1. Page 12, last paragraph, it is not clear what the "...light nonaqueous phase liquids" are.
2. Page 23, please provide an explanation as how the information for lateral contamination adjacent to the NASA facility will be ascertained. Moreover, it is not clear how this data gap will be filled. Please explain what you will undertake to fill this data gap.

### Site 9 Action Memorandum

1. Page 53, first paragraph, the value of VC is not given. Moreover, it is not clear how the conversion 10-20 % of 1,2 DCE to VC was derived. Please explain.
2. Page 63, paragraph 5, it is not clear which document the " RI " is referring to. Please clarify.
3. Page 65, paragraph 1, if the lateral extent of the contamination is not known how do you assume that the downgradient well of W68-1 (A1) is W09-18 (A1)? Plate 2 identifies the location of this well to be northeast of W68-1 (A1). Please provide an explanation.
4. Page 156, paragraph 1, please provide the zone of the new proposed well.
5. Page 164,
  - i. Paragraph 1, please explain how much time is required to perform bench scale studies to confirm the effectiveness of the proposed design.
  - ii. Paragraph 2, please provide an explanation as what will happen to the groundwater extraction system after one year.
  - iii. Paragraph 3, it is not clear what areas will be included in the soil bioremediation. Please clarify.

Distribution List

U.S. Environmental Protection Agency  
Attn: Mr. Lewis Mitani  
Mail Code H-7-3  
75 Hawthorne Street  
San Francisco, CA 94105

California Regional Water Quality  
Control Board  
San Francisco Region  
Attn: Mr. Wil Bruhns  
2101 Webster Street, Suite 500  
Oakland, CA 94612

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