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MOFFETT FIELD
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

18 June 1991

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

Dear Mr. Chao:

Enclosed are the comments of the Environmental Protection Agency (EPA) to the Draft Tank and Sump Removal Summary Report for Naval Air Station Moffett Field, April 30, 1991.

If you have any questions please call 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 recs

1146

EA 30

EPA Comments to
Draft Tank and Sump Removal Summary Report
Naval Air Station Moffett Field

General:

1. Throughout the report, background ranges established by IT Corp. were used for comparing inorganic concentrations in soils. The text should note that the ranges established by IT Corp. were not accepted by the EPA (For explanation, see EPA comments to Phase I Characterization Report: Section 3, comment number 8 (Sept. 27, 1990).). The text should also note that the reference (IT, 1990d) is a draft document reference.
2. EPA methods of analysis and detection limits for the groups of constituents analyzed should be included in the report. A table presenting this information would be useful.
3. For tanks 56A, 67, and 68 and sumps 60 and 61, please describe in detail (include figures) in each relevant section the impacts on surrounding soils from each. This description is requested to achieve the objectives of the tank and sump removal actions at NAS Moffett Field (see Page 1, 2nd Bullet). Because no further action is proposed on the soils for these tanks and sumps, details of the nature and extent of contamination for each should be provided in this document.

Specific:

1. Page 28, 5th Paragraph

Please state whether the soil samples from the tank were collected at the soil/groundwater interface.

2. Page 43, 1st Paragraph

Please state whether contamination was visible in the soil in the excavation pit.

3. Page 43, 3rd Paragraph

Please state the integrity of the pipes.

4. Page 43, 4th Paragraph

Please state whether the soil samples from the tank were collected at the soil/groundwater interface.

5. Page 64, Summary

Please describe in the section the impact on surrounding groundwater from Tank 2. TCE and PCE were detected in W2-1(A1) above MCLs; therefore, significant contamination exists in the groundwater. Please discuss the possibility of future contamination of the groundwater from the contaminated soil.

6. Page 68, Summary (1st Paragraph)

Please describe in the section the impact on surrounding soil from Tank 14. Please define the "small area" of observed soil contamination. Are the nature and extent defined? Please explain in the text.

7. Page 68, Summary (4th Paragraph)

Please describe in the section the impact of surrounding groundwater from Tank 14. Are the nature and extent of contamination defined? Please discuss the possibility of future contamination of the groundwater from the contaminated soil. Please explain in the text.

8. Page 87, Summary

Please describe in the section the affect Tank 53 had on the groundwater. Please explain the phrase "... has not been significantly affected...". Please discuss the possibility of future contamination of the groundwater from the contaminated soil.

9. Page 141, Table 38

Please correct the discrepancy between this table and the text regarding Tank 14 and Tank 43.

Distribution List

California Regional Water Quality
Control Board
San Francisco Bay Region
Attn: Mr. Wilfried K. Bruhns
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