



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, Ca. 94105

NOV 13 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 Naval Air Station Moffett Field's (NASMF) North Base Area Field Investigation (NBA). EPA is concerned there is a potential for contaminants to reach the wetlands and San Francisco Bay, both sensitive ecological environments.

Because of the sensitive ecological environmental setting, EPA recommends a removal action, or source control action to gain hydraulic control of the leading edge of any plume. Further, EPA recommends a horizontal conduit study to determine if part of any storm/sewer system contributed to contaminant migration or served as a preferential pathway.

EPA agrees with the recommendations of the NBA report to study further releases of VOC's and additional sampling should be conducted. Any additional work in the NBA should also be tailored toward information needed for hydraulic control of the leading edge of any plume. The recommendation for a ecological risk assessment would be helpful in determining further characterization work in the wetlands area and is required as part of a remedial investigation. However, an ecological risk assessment is not necessary to make a determination for a removal action. The removal action would be limited in scope; hydraulic control/source control to prevent contaminant migration.

If you have any questions 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

1258

E/A 34

Distribution List

Department of Health Services  
Toxic Substances Control Division  
Attn: Mr. Cyrus Shabahari  
2151 Berkeley Way, Annex 9  
Berkeley, CA 94704

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

CDM-Federal Programs  
Attn: Ms Peggy Severson  
301 Howard Street, Suite 910  
San Francisco, CA 94105

EPA Comments to  
North Base Area Field Investigation  
Naval Air Station Moffett Field

Comments:

1. Section 2.3.1, Page 11.

This paragraph states water samples were transferred from the Hydopunch sampler into two 40 ml VOA vials. Why were three 40 ml VOA vials not used as stated in the North Base Area (NBA) Investigation Work Plan?

2. Section 3.0, page 12.

This section states the mobile laboratory analyzed the samples using EPA Method 8010/8020. However, Table 1 of the NBA Investigation Work Plan indicates samples would be analyzed using EPA Method 601. Why the change in analytical methods?

3. Section 3.1.3., page 22.

The last sentence in this paragraph states the greatest density of coarse grained sediment is located in Site 8. It would be helpful to delineate Site 8 on Figure 3.

4. Section 3.2.8., page 32.

The text states that the highest values from the southwestern area for trichlorofluoromethane was at CPT -11 (3.8 ug/l). However, according to Table 1 and the Appendix, the highest values of Trichlorofluoromethane were found at CPT-6 at 31 ug/l (HPNB-37) and 30 ug/l (HPNB-56).

5. Section 5.1, page 37.

The first sentence states the data does not indicate a source. However, CPT-14 has 11 ug/l of 1-1-DCA, 20 ug/l of 1,1-DCE, 29 ug/l of trans 1,2-DCE, 24 ug/l of 1,1,1-TCA and 49 ug/l of TCE. This point appears anomalous when compared with points adjacent to it.

The significance of the findings at CPT-14 should be discussed in the text.

6. Section 5.2, page 37, second paragraph.

Several compounds (1,1-DCA, 1-2 DCE, TCE and PCE) appear to have migrated into the wetlands area northwest of NAS Moffett property.

It appears the compounds may be migrating along the Paleo Stream channels delineated in Appendix B. Recommendations should address the protection of the wetlands and potential migration beyond the wetlands. The possibility of conducting a horizontal conduit study to further delineate these plumes should also be discussed.

Editorial comments.

1. Section 3.0, page 13 second paragraph.

The last sentence of the paragraph should indicate Table 1 not Table 2.

2. Section 3.2.4, page 28, fourth sentence.

According to Table 1 and the appendix, the highest concentration of 1,2-DCE at CPT-14 was 29 ug/l not 29.4 ug/l.

3. Section 3.2.6, page 32.

The second to the last sentence states "No TCE was detected in samples from either HP-27 or HP-28..". Should these sample points read CPT-27 and CPT-28?.

4. Section 5.1, page 36, third paragraph.

There is not Section 1.4 in this report.