



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

75 Hawthorne Street  
San Francisco, Ca. 94105-3901

November 13, 1992

Stephen Chao  
Western Division  
Naval Facilities Engineering Command  
900 Commodore Way, Bldg. 101  
San Bruno, CA 94066-0720

Dear Mr. Chao:

The U.S. Environmental Protection Agency has reviewed the North Base Area Hydrogeologic Investigation Draft Final Report for the NAS Moffett Field NPL site.

The comments of our consultant, SAIC, are attached. These comments indicate that the issue of whether adequate hydraulic control is provided by Building 191 in the North Base Area requires further examination. In addition to the recommendation made by SAIC of performing a historical trend analysis, you could evaluate the capture zone by adding two quarters of ground water sampling in the North Base Area, including existing wells and newly installed wells WNB1, WNB2, WNB3. How does the Navy's quarterly sampling program address this issue?

Please call me if you have any questions regarding these comments at (415) 744-2385.

Sincerely,

Roberta Blank  
Remedial Project Manager

cc: Elizabeth Adams, RWQCB  
Cyrus Shabahari, DTSC

OPTIONAL FORM 99 (7-90)		# of pages ▶ 3	
<b>FAX TRANSMITTAL</b>			
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NGN 7540-01-317-7388		GENERAL SERVICES ADMINISTRATION	
5099-101		2553	



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November 10, 1992

DCN: TZ4-C09015-RN-M15143

Ms. Roberta Blank (H-9-2)  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Ref: EPA Contract No. 68-W9-0008; EPA Work Assignment No. C09015  
SAIC/TSC Project No. 06-0794-03-0630  
NAS Moffett Field  
North Base Area Hydrogeologic Investigation Draft Final Report

Dear Roberta:

SAIC/TSC has completed its technical review of the referenced report. The review was performed by soil scientist Scott Kinderwater and geologist Richard Brown.

One of the objectives of this study was to conduct additional investigations in the North Base Area (NBA) to determine the feasibility of using limited hydraulic source control methods to prevent the further migration of contaminants into the wetlands (PRC Environmental Management, Inc., North Base Area Investigation, Final Work Plan, February 6, 1992). The Navy states in the *NBA Hydrogeologic Investigation Draft Final Report* that volatile organic compounds (VOCs) are not being released into the wetlands or the NASA/Navy stormwater retention pond, as long as pumping at Building 191 continues. However, trichloroethene, dichloroethane, dichloroethene, and tetrachloroethene were detected in recent Hydropunch<sup>®</sup> and A1-and A2-Aquifer zone groundwater samples from the wetlands area. Based on these findings, SAIC/TSC concludes that the Navy did not meet the stated objective of determining if additional hydraulic controls are necessary.

Ms. Roberta Blank  
November 10, 1992  
Page 2



Monitoring wells that do not appear to be influenced by horizontal conduits or pumping at Building No. 191 are as follows:

10 H01A	10 J02A
10 H02A	10 J03A
10 J04A	11 M02A
10 J01A	11 M03A

This was determined by comparing the locations of these monitoring wells to the configuration of the piezometric surface measured on March 19, 1992.

An evaluation of historical trends of VOC concentrations detected in these monitoring wells could support the Navy's conclusion that VOCs are not being released into the wetlands. On the other hand, this evaluation could indicate the need for additional hydraulic controls.

Given the information presented to date, SAIC/TSC recommends that interim remedial measures be considered to provide complete hydraulic control of the distal end of the VOC plume in the North Base Area.

If you have any questions regarding these comments, please call me at (415) 399-0140.

Sincerely,

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A handwritten signature in cursive script that reads "Fred Molloy". The signature is written in dark ink and is positioned above the typed name and title.

Fred Molloy  
Work Assignment Manager

FM:ks