

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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Mr. Stephen Chao
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Department of the Navy
Naval Facilities Engineering Command
900 Commodore Way, Bldg. 101
San Bruno, CA 94066-0720

August 2, 1993
File No. 2189.8009 [EA]

Subject: Comments on the Horizontal Conduit Study Final Field Work Plan, July 1993.

Dear Mr. Chao:

This letter is in response to the Navy's responses to San Francisco Bay Regional Water Quality Control Board staff's comments on the Draft Final Field Work Plan. Several of the Navy's responses do not adequately address the concerns of our agency, therefore we can not approve the Horizontal Conduit Study Final Field Work Plan at this time.

Regional Board staff has communicated to the Navy over the past year that the evaluation of the storm sewers and the potential impact of the storm sewer system on water quality and the environment was required at Moffett Naval Air Station since it is a closing Base.

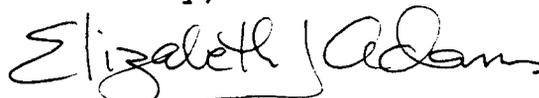
It is imperative that this study address all the possible contaminants which would be potentially transported through the storm sewer lines, and not just the VOC and TPH contaminated groundwater located on the west side. The response-to-comments letter repeatedly states that there is no metals contamination at Moffett NAS. Heavy metals often occur with organic contaminants, and may be transported in both the dissolved state and via sediments. Water and sediment samples from storm sewer lines should be analyzed to verify that no metals contamination is present. In the past, sediment sampling at the storm sewer outfall locations, both at Building 191 and in the storm water retention ponds at the end of Zook Road and Lindburg Avenue, have shown the presence of pesticides and PCBs. The sources for these contaminants are presently unknown (although the Site 2 landfill may be responsible for the building 191 detections), it is likely that the storm sewer system acts as the pathway for these contaminants due to groundwater infiltration. Sampling for PCBs and pesticides in the sediments and backfill materials in areas "upstream" of these outfall areas will help determine if the storm sewer is acting as a conduit and help to further define the possible sources for this contamination. The Ecological Assessment field work may further delineate the extent of contamination within the pond and Navy Channel, but the horizontal conduit study is the opportunity to address the pathway of these contaminants.

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The Response-to-Comments letter states that individual source control measures will evaluate the potential for conduits on the east side of the Base. What are the source control measures and how will the Navy address our agency's concern that an evaluation of the storm sewers be conducted to determine if they are acting as conduits for contamination on site?

We look forward to meeting with you soon and discussing these issues. If you have any questions or concerns, please call me at (510) 286-3980.

Sincerely,



Elizabeth J. Adams
Project Manager

cc: Michael Gill
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Mail Stop H-9-2

Chip Gribble, DTSC