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MOFFETT FIELD
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

June 14, 1994

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

Re: Site 14 South Evaluation Technical Memorandum, dated April 11, 1994

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and submits the following comments. Call me at 415-744-2383 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Gill".

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

cc: C. Joseph Chou (DTSC)
Ken Eichstaedt (URS)
Ron Gervason (RWQCB)
Sandy Olliges (NASA)
Peter Strauss (MHB)
Mike Young (PRC) (Fax)

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Moffett Field Site 14 South Evaluation Technical Memorandum, dated April 11, 1994
General Comments

1. This technical memorandum describes action to be taken to remediate Site 14 at Moffett Field. The site has an Action Memorandum dated September 10, 1990. There needs to be included in this tech memo a brief discussion of this Action Memo and any changes in scope of action, potential waiver requirements, any necessity for an Action Memo resubmittal, etc.
2. The Navy assumes in this document that the groundwater at the Site 14 South area does not need to be remediated because it "does not exceed the anticipated groundwater petroleum cleanup levels". Without stating these anticipated cleanup levels, the regulatory agencies have nothing with which to compare the existing contamination levels. Are we talking about the "Scenario B" levels from the cleanup level analysis? As of this date, there has been no acceptance from the State on any cleanup levels. If this assumption turns out to be incorrect and the petroleum levels in the groundwater are not below the accepted cleanup levels, then this document will be severely deficient. Only soil cleanup technologies are considered here. Even if this assumption turns out to be correct, groundwater monitoring should be included in the remedy.
3. Pilot studies for the three alternatives in this technical memo were discussed at the most recent RPM meeting (June 7, 1994). They are to be performed at various sites at Moffett Field - SVE at Site 9, bioventing at Site 5 and RIST at Site 14. It needs to be made clear that although this tech memo is recommending a "phased design" (pilot study) for Site 14, all of these pilot studies are actually underway at Moffett.
4. It is our assumption that the lessons learned from the operational difficulties at Site 14 South will be applied to the other pump and treat systems being developed for use at Moffett Field.

Specific Comments

1. Section 2.1, page 4, para 3. Please explain how this contractual requirement between PRC and their analytical laboratories can be sufficient to completely characterize TPH.
2. Section 2.2, page 8. Please provide a simple diagram that shows the system components and the sample points, as described in the text.
3. Section 2.2, page 8, para 3. Why wasn't the GAC material sampled for TPH constituents? Are not these the primary constituents in the water?
4. Section 3.0, page 15. If the Navy is going to make a decision based on anticipated petroleum cleanup levels, the text should reflect these levels. Even if these anticipated cleanup levels are to be used and the present levels of petroleum fall below these cleanup levels, the Navy still needs to include groundwater monitoring as part of its future actions.
5. Section 3.0, 4.0. A weighted criteria comparison table would help to better illustrate the alternative comparison and the decision made (like a nine criteria comparison).
6. Section 4.1, page 24, Costs and Appendix C. The alternative chosen here is understood to be for a pilot study (phased design), so operation and maintenance costs may not be applicable. But it would be appreciated if the line items in the appendix could be provided to give the reader a reality check.