

MOFFETT FEDERAL AIRFIELD

**RESPONSE TO AGENCY COMMENTS ON
ACTIVE PETROLEUM SITE INVESTIGATION
DRAFT FIELD WORK PLAN**

AUGUST 31, 1994

This report presents point-by-point responses to U.S. Environmental Protection Agency (EPA) comments on the Active Petroleum Sites Investigation Draft Field Work Plan prepared May 27, 1994 by PRC Environmental Management, Inc. (PRC) for Moffett Federal Airfield in Sunnyvale, California. Mr. Michael Gill submitted comments to the Navy on June 14, 1994. Representatives of the California Department of Toxic Substances Control and the San Francisco Bay Regional Water Quality Control Board informed Mr. Mike Young (PRC) that they had no comments on the work plan.

Comment 1: Section 3.1.1, page 4, paragraph 2. Figures 3 and 4 appear to be almost identical. Figure 3 needs to be corrected. Figure 4 is correct.

Response: *Figure 4 was inadvertently labeled as Figure 3 in the draft field work plan. The correct figure has been incorporated into the final work plan.*

Comment 2: Section 4.2.1, page 10, first incomplete paragraph. Groundwater measurements that are monitored in the inaccessible pits should be reported to the regulatory agencies at some point in this process.

Response: *The Navy will include data from selected monitoring wells directly down gradient of the inaccessible pits in the technical memorandum for this investigation. Several rounds of data have been generated for samples collected from these existing wells.*

Comment 3: Section 4.2.2, page 10. "The borings will be continuously cored from just beneath the asphalt cover to the first saturated interval." If analysis of the corings show that contamination is present in the first saturated layer, the Navy should continue sampling deeper until no Navy contaminants are found.

Response: *If contaminants are observed in cores at the top of the saturated zone the Navy will collect a soil sample from the saturated zone near the bottom of the borehole.*

Comment 4: Section 4.3, pages 11 and 12. Soil and groundwater samples should also include analysis for VOCs.

Response: *The Navy agrees that the sample suite at Hangar 1 sites should include VOCs, since the regional VOC plume from the Middlefield-Ellis-Whisman (MEW) group may be under the hangar. However, the Navy does not agree that the sample suite for the high speed refueling facility and for the fuel pier should include VOCs. There is no historical evidence of VOC use or uncontrolled release at either site. Furthermore, there is no evidence of a plume beneath either site from an upgradient source.*

2103

Comment 5: Section 4.4, page 12. Groundwater samples should include analysis for VOCs.

Response: *The Navy agrees that the sample suite at Hangar 1 sites should include VOCs, since the regional VOC plume from the Middlefield-Ellis-Whisman (MEW) group may be under the hangar. However, the Navy does not agree that the sample suite for the high speed refueling facility and for the fuel pier should include VOCs. There is no historical evidence of VOC use or uncontrolled release at either site. Furthermore, there is no evidence of a plume beneath either site from an upgradient source.*

Comment 6: Tables 3 and 4, pages 14 and 15. The analytical suite should include VOCs. Please show soil and groundwater sample locations on a map.

Response: *The Navy agrees that the sample suite at Hangar 1 sites should include VOCs, since the regional VOC plume from the Middlefield-Ellis-Whisman (MEW) group may be under the hangar. However, the Navy does not agree that the sample suite for the high speed refueling facility and for the fuel pier should include VOCs. There is no historical evidence of VOC use or uncontrolled release at either site. Furthermore, there is no evidence of a plume beneath either site from an upgradient source.*

An additional figure has been created to illustrate approximate sample locations at the fuel pier. Figures 2 and 3 illustrate in plan view the approximate sample locations at Hangar 1 and at the high speed refueling facility.

Comment 7: Section 6.0, page 18. "Currently, data indicate that VOC and TPH contamination is present in some soils and groundwater." This statement should encourage the Navy to comply with the requests for VOC analysis in comments 4, 5, and 6.

Response: *As stated above the Navy agrees that samples from Hangar 1 should be analyzed for VOCs. However, the above-mentioned contaminated soil and groundwater refers to trichloroethene (TCE) in soils and groundwater beneath and west of Hangar 1. The TCE that may be in soils and groundwater beneath Hangar 1 would be from the MEW plume. However, there is no evidence of VOC contamination in soil or groundwater beneath the high speed refueling facility or the fuel pier. The nearest VOC plume to the high speed refueling facility is located north of Hangar 3, more than 600 feet cross gradient of the site. The nearest VOC plume to the fuel pier is several thousand feet upgradient of the site, and is separated from the site by a salt pond.*