



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**  
**SAN FRANCISCO BAY REGION**  
2101 WEBSTER STREET, SUITE 500  
OAKLAND 94612

April 18, 1995  
File No. 2189.8009(sfg)

Mr. Mark Kadnuck  
Project Engineer  
PRC Environmental Management, Inc.  
1099 18th Street Suite 1960  
Denver, CO 80202

Subject: Moffett Federal Airfield Site 9 Source Control Measure (SCM) Proposed  
Self-Monitoring Program Sampling Schedule dated March 15, 1995

Dear Mr. Kadnuck:

Staff of the Regional Water Quality Control Board (RWQCB) received your proposal, on behalf of the Navy, for a "long-term" Self-Monitoring Program (SMP) sampling schedule, to begin in May 1995. Your proposal (received in this office on March 20, 1995) modifies the existing "start-up" schedule by reducing the effluent sampling from weekly to quarterly for Building 12, and from weekly to monthly for Buildings 6 and 45. Your request for modification is based on successful operation of Buildings 6 and 12 since October 1994. You have also proposed analyzing for total metals instead of both total and dissolved, as is currently being done. We agree that the sampling frequency and analysis can be reduced. However, RWQCB approval is contingent upon clarification of some questions that arose during my review of your request. Those items are outlined below.

1. **Building 45 flow from storm drain:** According to our telephone call of March 3, 1995, Building 45 will be receiving storm water from sumps in the vicinity of Site 9. You must provide additional information in writing about this influent, i.e., the reason for this additional contribution, approximate volume or flow rate, if it is within the flow capacity of the treatment system, whether this will be a short-term or long-term contribution, expected contaminants.
2. **Building 45 sampling schedule:** There has been some difficulty getting the treatment system operating continuously for Building 45. The Navy intends to follow the startup schedule outlined in the RWQCB letter of May 9, 1994 for six months, prior to implementing the "long-term" schedule. The "long-term" schedule may not be implemented until it can be demonstrated that the

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treatment system is fully operational and until the RWQCB reviews the results of the start-up sampling period.

3. **Use of chemical additive to reduce scaling in Building 45 Treatment System:** In January 1995, we discussed your proposal to use a calcium carbonate additive to reduce the scaling problem in the airstripper; you provided me with toxicity data and an information sheet provided by the manufacturer on the proposed chemical. Please clarify as to whether this chemical is now in use at the concentration recommended by the manufacturer.
4. **Explanation of table outlining proposed long-term schedule:** Please provide an explanation of which of the 'Sample Ports' relates to influent and effluent for each of the treatment systems. Please also provide a detailed description of where the receiving water sample is taken at the Nasa Settling Basin (NSB).
5. **Re-evaluation after one year:** The Navy has proposed evaluating the operation of the treatment systems after one year to determine if any modifications are required. While this seems reasonable, if effluent limit exceedances occur and appear to be reflected in the NSB receiving water samples, the Navy may need to perform additional sampling and analysis, or other evaluations of potential impact to receiving waters (please see RWQCB letters to you dated October 19, 1994 and to Stephen Chao dated March 14, 1995 regarding substantive General NPDES permit requirements for discharges from treated groundwater).

As was required in the RWQCB letter of May 9, 1994, reports on start-up operations for Building 45 will need to be submitted weekly until it is fully operational. Reports for Buildings 6 and 12 can be submitted quarterly, beginning with July 15th, 1995. For chemical analyses, please provide the results (including laboratory detection limits) for all constituents at both influent and effluent sampling stations for all three treatment systems and NSB.

Please contact me at 510-286-0840 if you have any questions.

Sincerely,

  
Susan Gladstone  
Environmental Specialist III

cc: Stephen Chao, EFA ✓  
Micheal Gill, EPA  
Joseph Chou, DTSC  
Sandra Olliges, NASA