

MOFFETT FEDERAL AIRFIELD

**RESPONSE TO COMMENTS ON
DRAFT ADDITIONAL PETROLEUM SITES INVESTIGATION
TECHNICAL MEMORANDUM**

January 20, 1995

This report presents responses to regulatory agency comments on the June 1994 Draft Additional Petroleum Sites Investigation Technical Memorandum prepared by PRC Environmental Management, Inc. (PRC) for Moffett Federal Airfield (MFA), California. Mr. Michael Gill of the U.S. Environmental Protection Agency (EPA) submitted comments in a letter dated July 19, 1994. Mr. Joseph Chou of the California EPA Department of Toxic Substances Control and Mr. Michael Bessette of the Regional Water Quality Control Board, San Francisco Bay Region did not submit comments.

GENERAL COMMENTS

Comment: Validation of certain data was in progress and not completed in time for this report. Be sure to point out any discrepancies between the validated and unvalidated data in the draft final version of this document.

Response: *All data from this investigation have been validated. The unvalidated data in Appendices C and F have been replaced with the validated data for the final version of the report.*

SPECIFIC COMMENTS

Comment 1: Tables 4, 5, 6, 7, 9, 10. Please provide a footnote explanation why certain contaminant types were not analyzed (NA designation).

Response: *Selection of contaminant types for sample analysis was based on existing knowledge of contaminants at each investigation area. The explanation has been included in Section 2.0 (first paragraph) of the final version of the technical memorandum.*

Comment 2: Tables 4, 7, and 10. These tables have footnotes which indicate that certain contaminants were detected at levels below their detection limits. Please indicate these detection limits.

Response: Tables 4, 5, 6, 7, 9, and 10 of the final version summarize laboratory data and include footnotes containing detection limits for selected analytes. Soil and groundwater data tables in Appendices C and F of the final report contain detection limits for all compounds analyzed.

Comment 3: Section 5.1, Pages 16, 17. It would make sense that the Close Analytical Support Laboratory (CSAL) sample concentrations are higher than the (not validated) composite sample concentrations from the state certified laboratory for at least two reasons. VOCs (volatile organic compounds) are more easily volatilized during composite sampling by virtue of the sampling technique. Also, since there is essentially no holding time after CSAL sample collection, concentrations will be higher. There appear to be huge discrepancies between the two samples sets, sometimes as much as 3 orders of magnitude. The sentence on page 17 stating that the differences "are likely attributable to small scale differences in contaminant distribution within a heterogeneous soil profile and the relatively smaller quantity of samples collected for the CSAL analysis" is not enough reason to eliminate the CSAL samples. Until the validated data returns from the state certified laboratory, it may be premature in making a decision about which data are more useable. Even then, if such discrepancies still exist, it may be necessary to resample the questionable areas. It may be useful to examine two maps similar to Figure 3, one with CSAL concentrations plotted and the other with state certified, validated concentrations plotted and observe the discrepancies.

Response: The Navy continues to believe that discrepancies between the laboratory and CSAL data are likely attributable to nonuniform contaminant distribution with a heterogenous soil profile and the relatively smaller quantity of sample collected for the CSAL analysis. These discrepancies have been confirmed by the laboratory data validated since the draft version of the report was completed. As a result of the smaller quantity of sample collected, CSAL

sampling is more discrete than the samples collected for standard laboratory analyses. However, because the soil profile is heterogeneous and contaminants are not uniformly distributed, attempts to characterize the contaminated interval may present a false representation of the extent of contamination. In addition, CSAL data were intended only to be used as a screening tool to select sampling locations, not to evaluate the nature and extent of contamination. Furthermore, CSAL data do not fulfill standard risk assessment data requirements. Section 5.1 of the final report discusses the reasons for discrepancies between the two data sets and discusses the roles of the two sampling types in this investigation. Only the state-certified laboratory data will be used to further characterize soil and groundwater contamination at MFA. Figures 2 and 3 of the final report version include both CSAL and laboratory data to highlight the differences between the two data sets.



February 6, 1995

Mr. Stephen Chao
Department of the Navy
Engineering Field Activity West
Naval Facilities Engineering Command
900 Commodore Way, Building 101
San Bruno, California 94066-2402

CLEAN Contract Number N62474-88-D-5086
Contract Task Order 0236

**Subject: Response to Comments on Draft Additional Petroleum Sites Investigation
Technical Memorandum, Moffett Federal Airfield**

Dear Mr. Chao:

Enclosed please find one copy of the above-referenced document prepared by PRC Environmental Management, Inc. (PRC). This document originally accompanied the Final Additional Petroleum Sites Investigation Technical Memorandum on January 20, 1995. It came to our attention that page 2 of the Response to Comments document was not included in some of the copies distributed on January 20, 1995. Please replace the Response to Comments on Draft Additional Petroleum Sites Investigation Technical Memorandum with the copy enclosed.

If you have any questions or comments, please call us at (303) 295-1101.

Sincerely,

A handwritten signature in cursive script that reads "Doreen A. Hoskins".

Doreen A. Hoskins
Project Geologist

Michael N. Young
Project Manager

DAH/mkf

Enclosure

cc: Distribution List

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Response to Comments on
Draft Additional Petroleum Sites Investigation
Technical Memorandum

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