



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

May 8, 1995

Mr. Stephen Chao
Naval Facilities Engineering Command
Engineering Field Activity West
Code 09-ER5
900 Commodore Way, Bldg. 101
San Bruno, CA 94066

Subject: Review of Draft Wash Rack Area Investigation Field Work Plan, dated April 21, 1995

Dear Mr. Chao:

I am submitting these comments on the above referenced document as the EPA project Manager for the Middlefield-Ellis-Whisman (MEW) site since the areas to be investigated are within the Regional MEW groundwater plume. These comments are submitted as additional comments to any comments submitted by Michael Gill, the EPA project manager for Moffett Air Field.

General Comments:

1. Though this investigation seems to be adequately designed to determine groundwater quality in the wash rack area, there are no proposed soil samples adjacent to catchment basin 297B or the drain line to Sump 25. Soil borings in these areas are necessary to determine if the integrity of the basin and line have been compromised, potentially leaking contaminants into the vadose zone directly below the structures. Past releases of contaminants to the soil may continue to act as a source to the groundwater.

2. The text mentions a fourth soil boring, located near Tank 41A, that will be part of another investigation. In a telephone conference with Mike Young, PRC's project manager, he indicated that those soil samples will be analyzed for volatile organic compounds (VOCs) in addition to petroleum constituents. It would be helpful to indicate this additional soil analysis for VOCs in the "Notes" section of Table 1.

If you have any questions or concerns regarding these comments, please call me at (415) 744-2235.

Sincerely,

Elizabeth J. Adams
EPA MEW Project Manager

cc: Michael Bessette, RWQCB
C. Joseph Chou, DTSC
Tom Jones, Schlumberger Technology
A. Eric Madera, Raytheon Company
Sandy Olliges, NASA Ames
Michael Gill, US EPA

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