



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

June 7, 1995

Mr. Stephen Chao
Naval Facilities Engineering Command
Engineering Field Activity, West
900 Commodore Way, Bldg. 101
San Bruno, CA. 94066-2402

Re: *Draft Site 9 Phase I Corrective Actions Technical Memorandum,*
dated April 27, 1995

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and provides the following comments. Because petroleum has been excluded from CERCLA at Moffett Federal Airfield (see Federal Facility Agreement [FFA] amendment of December 17, 1993 and FFA Sections 2, 5, and 7), final approval of this and other petroleum related documents must be performed by the State of California. If you have any questions, please call me at 415-744-2385.

Sincerely,

A handwritten signature in black ink, which appears to read "Michael D. Gill".

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

cc: C. Joseph Chou (DTSC)
Michael Bessette (RWQCB)
Ken Eichstaedt (URS)
Tom Jones (Schlumberger)
A. Eric Madera (Raytheon)
Sandy Olliges (NASA)
Peter Strauss (MHB)
Mike Young (PRC) (Fax)

COMMENTS

Draft Site 9 Phase I Corrective Actions Technical Memorandum, dated April 27, 1995

1. This technical memorandum is very well written. It presents the field activities conducted, results, summaries and recommendations clearly and concisely.
2. Section 1.1.3. This section mentions soil and groundwater cleanup levels, but does not quantify them. Please quantify both soil and groundwater cleanup levels for petroleum products as outlined in the Petroleum Sites Corrective Action Plan.
3. Section 1.2. EPA realizes the intent of this technical memorandum is to explain "the potential effectiveness of SVE and air sparging technologies for remediating petroleum contaminated soils and groundwater at Site 9". EPA still believes the issue of potential VOC contamination from Navy activities in this Site 9 area (excluding PCE from Building 88) is unresolved. Our recent meeting of April 20, 1995 with representatives from the Middlefield-Ellis-Whisman (MEW) companies (EPA, Navy, MEW) has reached no final conclusion. We realize that the Navy is presently reviewing the possibility of agreeing to some type of arrangement with the MEW companies for groundwater remediation of VOCs in this area, but understand that this has yet to be reached. A statement regarding this situation should be inserted somewhere in this document.
4. Figure 10, page 63. The plume contour of petroleum groundwater contamination above cleanup levels in Figure 4 extends significantly more downgradient than the apparent coverage of the combined SVE and sparge system shown in Figure 10. If one overlays the two figures, it appears that the system will not capture the leading edge of the eastern groundwater plume, which is approximately 200 feet downgradient of the nearest trench. Although bullet 3 on page 64 states that this configuration of sparge wells is only an initial configuration, it is difficult to believe that this configuration is sufficient.
5. Appendix E. Groundwater analysis results for at least three PRC sample IDs show VOC apparent detection limits that are much higher than other sample IDs. In most results in this appendix, the detection limits appear to be 10 ppb. Please provide the detection limits used in the VOC analyses. The noted exceptions are:

PRC Sample ID	Apparent Detection Limit (ppb)
SW9-3C-1	50
SW9-4B-1	100
SW9-4C-2	2000