

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2  
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BEP SY, CA 94710-2737

June 22, 1995

Commander  
Department of the Navy  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
Attn: Mr. Stephen Chao, Project Manager  
900 Commodore Drive, Bldg. 101  
San Bruno, California 94066-2402

Dear Mr. Chao:

**DRAFT ADDITIONAL SITES INVESTIGATION PHASE II REPORT, MOFFETT  
FEDERAL AIRFIELD (MFA)**

The Department of Toxic Substances Control (DTSC) and the San Francisco Regional Water Quality Control Board (RWQCB) have reviewed the subject document and prepared the following comments for your consideration:

1. Page 11, Section 1.5.4

It is correct that soil and groundwater cleanup levels at the petroleum sites does not include polynuclear aromatic hydrocarbons (PAHs). However, should PAHs be found through future confirmation analysis, the Navy will cleanup the contaminated soils to EPA PRGs accordingly.

2. Page 56, Section 5.1

Please note that the Petroleum Cleanup Levels at MFA was negotiated between the DTSC, RWQCB and the Navy.

3. Page 59, Section 5.3

Please note that CIWMB has determined that the Golf Course Landfill meet the definition of a solid waste disposal site pursuant to PRC 40122 and have not closed pursuant to the definition 14 CCR 18011, and therefore meet the scope and applicability of closure and postclosure standards in 14 CCR.

In the OU2-West 100% Design Report, the Navy has assured that "the only one of these OU2 sites (Site 18, near Building 88) requires remediation based on elevated concentrations of trichloroethane (TCE) and tetrachloroethane (PCE). Therefore, the RA will be implemented at OU2-West for Building 88 and surrounding unsaturated soils". However, according to NASA's recent field work, more TCE contaminated soils were found and

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excavated at the north of Site 8 (Navy storage yard) which is also part of OU2-West investigation area. Therefore, the subject report can be only considered as the project summary report for Building 88 not for the entire OU2-West. The Navy should re-evaluate any other potential soil contamination sources in the OU2-West, which should include the areas that petroleum products commingled with other CERCLA substances.

2. Please note that the Petroleum Cleanup Levels at MFA was negotiated between the DTSC, RWQCB and the Navy. In DTSC's letter dated July 6, 1994, it was clearly stated that the soil cleanup level must be based upon fuel constituents of concern and are intended to be protective to water quality. Cleanup levels based on total petroleum hydrocarbon (TPH) are not acceptable to DTSC. In the same letter, DTSC also addressed "Since benzo(a)pyrene has not been detected in other petroleum sites, the DTSC agreed with the Navy not to include PAHs in the current Moffett Field petroleum sites soil cleanup goals. The decision is based on the site specific information provided by the Navy, and is not contradictory with DTSC's policy of setting risk-basis individual constituent cleanup goals. This management decision shall not be applied to other federal facilities. In addition, should PAHs be found through future confirmation analysis, the Navy will cleanup the contaminated soils at the petroleum sites of Moffett Field to EPA PRGs accordingly".

3. It is addressed that the cleanup levels for polynuclear aromatic hydrocarbons (PAHs) in soils coincide with US EPA Region 9 PRGs. However, the detection limits in this report are much higher than the Preliminary Remediation Goals (PRGs) (EPA, Feb. 1995) and it will prohibit the positive identification of PAHs.

4. The Navy needs to explain how the total organic carbons (TOCs) are sampled and analyzed in this report.

Please incorporate all comments, then the document can be finalized. If you have any questions, please contact me at (510) 540-3830.

Sincerely,



C. Joseph Chou  
Remedial Project Manager  
Base Closure Unit  
Office of Military Facilities

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Enclosure

cc:

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