



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

N00296.002311  
MOFFETT FIELD  
SSIC NO. 5090.3

July 21, 1995

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

Re: *Final Wash Rack Area Investigation Field Work Plan*,  
dated July 3, 1995

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document. We have additional comments that need to be addressed before final approval is granted. Field work need not be delayed due to these comments. However, decisions to be made in the future from the analysis results may change based on these comments. If you have any questions, please call me at 415-744-2385 or Elizabeth Adams at 415-744-2235.

Sincerely,

A handwritten signature in cursive script that reads "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**

*Final Wash Rack Area Investigation Field Work Plan, dated July 3, 1995*

### **GENERAL COMMENTS**

1. The intent of the soil borings requested in EPA's letter of May 8, 1995 (Elizabeth Adams) was to determine if there is a source remaining in the soils surrounding the catchment basins and the associated underground piping. The three (present) soil boring locations associated with the installation of the monitoring wells do not address EPA's concern regarding the possibility of a remaining soil source of contaminants that may be migrating to the groundwater. In addition to selecting soil boring locations based on preferential pathways for groundwater flow, the additional criteria that needs to be considered is the location of potential sources. It appears in the text that additional soil borings are planned. They should be placed in the area of the catchment basin and the associated underground piping to determine if the structures have released contaminants into the surrounding soils. Please consult with the agencies prior to the final selection of these additional locations.
2. Results from CPT and Hydropunch samples should be shared with the regulators and the MEW companies at the same time so that joint decisions can be made to facilitate completion of this investigation.

### **SPECIFIC COMMENT**

3. Section 2.0, page 2, para 1. The use of criteria based on "one order of magnitude" is arbitrary and not conducive to full evaluation of the factors that may influence contaminant migration in the area such as local geology, groundwater gradient and locations of stream channels. A hydrogeologic evaluation of the data with rationale should be completed to determine whether the wash rack area is a potential source of volatile organic compounds.