

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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OAKLAND 94607

Phone: Area Code 415
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May 6, 1988

File No. 2189.8009(TJB)

Captain C. T. Moyer, III
Commanding Officer
Naval Air Station Moffett Field
Moffett Field, CA 94035

**SUBJECT: Sampling and Analysis Plan, Quality Assurance Project
Plan, and Solid Waste Assessment Test Work Plans**

Dear Captain Moyer:

We have reviewed the revised Sampling and Analysis Plan (SAP), Quality Assurance Project Plan (QAPP), and Solid Waste Assessment Test (SWAT) plans prepared by IT Corporation dated March 30, 1988. All three plans are acceptable to Regional Board staff for the purpose of the Phase I and II field investigation work proposed. As stated in the respective plans, it will be necessary to submit an addendum to these plans for future investigations (Phase III).

The Environmental Protection Agency has also reviewed the sample plan and quality assurance plan and has determined that the revised plans meet EPA Region 9 quality assurance and sample plan criteria and are adequate for this project.

Attached to this letter are several comments regarding the sample plan and solid waste assessment test plan. The purpose of these comments are to provide clarification to the respective plans. It is not necessary to resubmit these plans to address these comments.

We look forward to the Navy implementing the proposed investigations at Moffett Field. If you have any questions regarding this letter please contact Tom Berkins of my staff at (415) 464-1249.

Sincerely,


Roger B. James
Executive Officer

Attachment

cc: Mailing List

374

RWQCB/NAVY 26

MAILING LIST

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ATTACHMENT

SAMPLING AND ANALYSIS PLAN (SAP) AND SOLID WASTE ASSESSMENT TEST COMMENTS REGARDING THE REVISED PLANS DATED MARCH 30, 1988

Sampling and Analysis Plan Comments

General Comment - In future technical reports and proposals it is recommended to group all the figures and tables in a separate section of the report rather than interspaced between written text pages.

1. Page 2-5, last sentence - As discussed with IT personnel, the intent of this sentence was to indicate that three samples per boring are the maximum that will be collected at most sites.
2. Sites 1 and 2, landfill investigations - Sections 2.4.3.5 and 2.5.3.5 state that a "maximum of five wells are planned." Depending on the levels of pollutants detected from the Phase I and II monitoring wells to be installed, it may be necessary to install additional wells to determine the vertical and lateral extent of pollutants emanating from the landfills.
3. Page 2-17, last paragraph - A soil boring is also recommended at the "burn pit" located within the Site 2 landfill.
4. Page 5-7 and Table 5-1 - The text on page 5-7 states that well locations listed in Table 5-1 will be geophysically logged to C aquifer depths. Based on discussions with IT personnel it is our understanding that the borings at Site 2 will only be logged to 100 feet below the estimated depth of landfill refuse.
5. Page 2-22, Section 2.6.3 - It is recommended to install monitoring well W3-20(A) further to the east (vicinity of proposed well W3-13(B1)).
6. Page 2-28, Section 2.8.3 - As stated in our previous comments (#20.a) dated January 26, 1988, it is recommended to install a B1 aquifer well north of the fuel farm concurrent or prior to installing proposed well W5-4(B2).
7. Page 4-3, Section 4-5 - As previously agreed to by Navy personnel and IT personnel, it will be necessary to conduct VOC analyses using GC methods after review of the first quarter GC/MS results. It is our understanding that the appropriate GC methods will be evaluated prior to initiating the Phase III investigation, and the specific GC methods will be presented in the Phase III sample plan addendum.

8. Page 5-8, Section 5.3.1 - No mention is made regarding joining of PVC casings. It is our understanding that the PVC casings will be square threaded and flush-jointed.
9. Page 5-12, Section 5.4.1 - It is recommended to test drilling mud residuals prior to disposal at a Class II landfill. An alternative to testing would be to use this approach only in areas of known low pollutant concentrations.
10. Page 5-14, Section 5.5.3 - It is our understanding that all monitoring wells installed will be evaluated (2 to 4 hours) to investigate possible tidal influences. Based on this evaluation, continuous water level monitoring will be performed in all wells affected by tidal influence for a period of one week or longer.

Solid Waste Assessment Test Work Plan Comments

Comment #2 above also applies to the SWAT section on monitoring wells proposed to be installed.