STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
2151 BERKELEY WAY, ANNEX 9
BERKELEY, CA 94704

N00296.000883
MOFFETT FIELD
SSIC NO. 5090.3

July 9, 1990

Commander
Western Division
Naval Facilities Engineering Command
Att'n: Mr. Stephen Chao (Code 1813SC)
P.O. Box 727
San Bruno, California 94066-0720

Dear Mr. Chao:

NAS MOFFETT FIELD, SITE 12 FIRE FIGHTING TRAINING AREA DRAFT WORKPLAN

Please find enclosed the Department of Health Service's Comments to the above document. If you have any questions regarding this letter, please call me at (415) 540-3818.

Sincerely,

Lynn Nakashima

Lynn Nakashima
Associate Hazardous Materials Specialist
Site Mitigation Unit
Region 2
Toxic Substances Control Program

Enclosure

cc: Lewis Mitani (H-7-3)
U.S. EPA, Region IX
1235 Mission Street
San Francisco, CA 94103

Wil Bruhns
Regional Water Quality Control Board
S.F. Bay Region
1800 Harrison Street, Suite 700
Oakland, CA 94612

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COMMENTS TO NAS MOFFETT FIELD
SITE 12 FIRE FIGHTING TRAINING AREA DRAFT WORKPLAN

PAGE	SECTION/ PARAGRAPH	COMMENT
2-1	2.1/3	It should be determined whether the aboveground waste fuel tank contains any waste. In addition, the tank should be sampled to determine its contents if material is found in the tank.
2-4	2.3	Please enclose a map showing the soil gas locations discussed in the text.
2-6	2.3.1/2	Please add that SB 12-11 contained 1700 ug/kg of butyl benzyl phthalate at the 1-foot level.
3-3	3.2/1	Figure 2.9 is not included in the text.
4-1	4.0	This section does not describe how soil samples from the trenches will be collected. Since the trenches will be visually inspected, personnel should not be allowed into the trench unless shoring is first done.
4-1	4.1/2	Figure 11 is not included in the text.
4-24	2.1/2	At what location will equipment be cleaned and how will rinse water be contained and collected prior to disposal? (This comment also applies to section 4.6, Decontamination Procedures)
4-3	4.2.2/1	The amount of neat cement grout used and the expected amount calculated to backfill the borings should be recorded. A grout mixer or some other method should be used to ensure that the grout contains no lumps.
4-5	4.3.2	Please explain your rationale for selecting a 0.010 inch well screen slot size.

4-5	4.3.2/2	How long will the bentonite pellets be allowed to hydrate, and how will "adequate" be determined?
4-5	4.3.2/2	Filter pack placement: The top of the filter pack should be sounded with a weighted measuring tape after each incremental rising of the auger. The height of the filter pack should then be compare to the calculated volume of filter pack material to ensure that no bridging has occurred. Bentonite seal: The bentonite should be tremied in and a weighted measuring tape may be used to tamp the pellets or break up bridges. The volume of grout seal material placed in the well should be measured and recorded in the well construction log and compared to the calculated volume required.
4-5	4.3.2/4	If any of the wells are located near traffic areas, traffic protection may be needed around the well heads. Each monitoring well should be identified on the well.
4-6	4.3.3/2	How will the well development water be handled? During well development and subsequent sampling, turbidity in NTU units must be measured.
4-7	4.4.1/2	How will the depths that the HydroPunch samples taken from be determined?
4-15	4.9.4	What type of calibration gas will be used on the OVA?
5-1	5.0	Eagle Picher Environmental Services is not certified with the State of California to analyze halogenated volatile organics, total petroleum hydrocarbons or base/neutral/acid-extractable (BNAs). DHS cannot accept laboratory results from non-state certified laboratories.

6-17	8.2/1	If the Navy wishes assistance from DHS in regards to decontamination protocol, then DHS should be contacted as soon as possible so that the appropriate staff support can be obtained.