

DEPARTMENT OF TOXIC SUBSTANCES CONTROL700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710
(415) 540-3724

August 9, 1991

Mr. Stephen Chao
Department of the Navy
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Building 101
San Bruno, CA 94066-0720

Dear Mr. Chao:

NAVAL AIR STATION MOFFETT FIELD SITE 12 FIELD WORK PLAN

The Department of Toxic Substances Control (DTSC) has reviewed the Site 12 Field Work Plan and has the following general comments which need clarification:

1. The fate of the aboveground tank as well as the sump are not apparent.
2. According to the work plan during the excavation the soils will be piled at a place. Please identify the location of the soil piles; in addition, if the soil piles will be covered before transporting them to the treatment pad.
3. Trucks transporting the soils should be tarped to minimize the dispersion.
4. It should be noted that back-filling the excavated area will not commence immediately after the excavation. In the meantime, the potential of water collecting as the result of rain or surface run-off remains. Please confirm if appropriate measures will be implemented to prevent such an occurrence.
5. If it rains during the excavation water will be collected in the excavated area. This could further complicate the situation. Please identify the steps to be taken to attenuate this likely complication.
6. Although the Navy is confident that 100 ppm target level is sufficient, but until the risk assessment results are available the Navy can not be assured. Therefore, by

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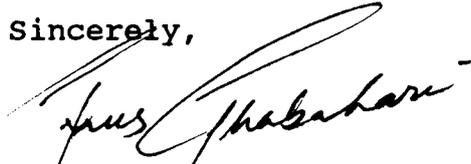
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developing a contingency plan, or implementing some preventive measures during the excavation, this future hinderance could be averted.

7. The mobilization and construction dates should be included in the text.

If you should have any questions, please call me at (415) 540-3821.

Sincerely,



Cyrus Shabahari
Waste Management Engineer
Site Mitigation branch
Region 2
Toxic Substances Control

cc: Mr. Lewis Mitani
U.S. EPA, Region IX
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Admin. Rec.