



August 27, 1991

Ms. Paula Pritz
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SUBJECT: Final Air Solid Waste Assessment Test Plan (Air SWAT), General Order 12B-99886C, Task Order K-04, March 28, 1990; NAS Moffett Field; IT Project Number 409729 (A1T456)

Dear Paula:

Approval of the Air SWAT Plan distributed in May 1991 was received from the Bay Area Air Quality Management District (BAAQMD) on July 25, 1991. The approval was communicated directly to Bill Gauntt from Mr. Brian Jennison, BAAQMD. Comments received on the plan were from NAS Moffett Field, EPA, and DHS. These comments, discussed in the attachment to this letter, have been incorporated into the Air SWAT Plan.

Copies of the Final Air SWAT Plan have been distributed to all agencies listed on the original distribution list for the May 1991 Air SWAT Plan.

Sincerely yours,

William A. Gauntt

per C. Keith Bradley
Project Manager

CKB/dav

Enclosures: Final Air SWAT Plan
Distribution List

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Air SWAT Distribution List

<u>Person/Affiliation</u>	<u>Copies</u>
Ms. Paula Pritz, MMES	3
Mr. Stephen Chao, WESTDIV	3
Mr. Steve Anschutz, NAS Moffett Field	2
Mr. Lewis Mitani, EPA 1227	1
Mr. Cyrus Shabahari, DHS 1228	1
Mr. Wil Bruhns, CRWQCB 1229	1
Mr. James Guthrie, BAAQMD 1230	1
Mr. Shari Katania, SCCHD 1231	1
Mr. Tom Iwamura, SCVWD 1232	1
Mr. George Gullage, MEW	1
Ms. Cathy McDade, CDM 1233	1
Ms. Sandra Olliges, NASA 1234	1
Mr. Tom Adkisson, PRC	<u>1</u>
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**EPA COMMENTS TO
AIR SOLID WASTE ASSESSMENT TEST PLAN
NAVAL AIR STATION MOFFETT FIELD**

Comment 1: The Air Solid Waste Assessment Test Plan (Air SWAT) states it will comply with the NAS Moffett Field Quality Assurance Project Plan (QAPP). Any modifications or new analytical procedures not in the current QAPP should be addressed by an addendum to the QAPP. It is important to keep the QAPP current since it is a part of the administrative record.

Response 1: The Air SWAT Sampling Plan will be incorporated into the QAPP with a written variance to the QAPP.

Comment 2: Task 3, Field Sampling and Analysis, Page 3-6.

The gas equilibration time, after purging and before sampling of each well should be specified, unless equilibration of the well is monitored with a vacuum gauge to determine when atmospheric pressure is attained. Additionally, it should be discussed how complete filling of the canister is determined, once the valve to the canister is opened.

Response 2: Text has been modified to clarify the sampling procedure - See Pages 3-7 and 8.

Comment 3: Task 3, page 3-10.

The plan specifies the areas will be screened utilizing a portable FID for the integrated surface sampling (ISS). The dimensions of the grids which will be traversed on the two sampling sites should be described. The dimensions appear to be about 33 x 550 feet, when scaled off of Figures 11 and 12, however, the intended dimensions should be stated.

Response 3: Figure 13 has been modified to show the dimensions of the area to be covered in both landfills. (See Figure 13)

**NAS MOFFETT FIELD
COMMENTS ON AIR SOLID WASTE ASSESSMENT TEST PLAN**

Comment 1: Page 3-3, paragraph 2, should the water level data and soil boring logs in the RI Characterization Report be utilized to evaluate the levels of water table at Sites 1 and 2?

Response 1: The RI Characterization Report along with the quarterly water level measurements reported in the Quarterly Report will be reviewed to help determine the water table levels at Sites 1 and 2.

Comment 2: Page 3-9, last paragraph, add the words "for each site" to the first sentence of the last paragraph. It should read as "Along with the LGCW and LGMW gas samples collected and analyzed as described above, an ISS is also required for each site".

Response 2: The comment clarifies the intent of the sentence. The appropriate changes to the text have been made.

Comment 3: Page 4-2, Table 2, Place Landfill Gas Characterization in Section 2.1 and Landfill Gas Migration in Section 2.2.

Response 3: Suggestion accepted. The appropriate change to the text has been made.

**CALIFORNIA DEPARTMENT OF HEALTH SERVICES
COMMENT ON AIR SOLID WASTE ASSESSMENT TEST PLAN**

Comment 1: The integrated surface sweep should not be conducted in strong winds. Wind direction and speed should be recorded.

Response 1: BAAQMD reviewed this requirement and have indicated that the ambient air monitoring requirement is waived. Wind speed will be measured throughout the test period. (See Page 3-10 & 11)

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MOFFETT FIELD
SSIC NO. 5090.3

ENCLOSURE

FINAL
AIR SOLID WASTE ASSESSMENT TEST PLAN

DATED 01 AUGUST 1991

IS FILED AS ADMINISTRATIVE RECORD NO.
N00296.001182