

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737



May 13, 1992

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QUALITY CONTROL BOARD

Ms. Elizabeth Adams
RWQCB
San Francisco Region
2101 Webster Street, Suite 500
Oakland, California 94612

Dear Ms. Adams:

MOFFETT FIELD OU-4 FIELD INVESTIGATION WORK PLAN

The Department of Toxic Substance Control (Department) is forwarding the following comments on the above report for your consideration.

GENERAL COMMENTS:

If the Remedial Investigation (RI) did not cover these additional investigations then it is safe to say that RI report has been incomplete. For example, Hanger 1 perimeter has not been investigated for a possible source.

The Department believes the purpose of this investigation is to fill the existing data gaps. The purpose of a work plan is not however, to discuss cost recovery issues. Consequently, the contamination allocation or cost recovery activities are considered irrelevant.

Samples must be analyzed for metals to ascertain the nature of contamination, especially Hanger 1 investigation.

SPECIFIC COMMENTS:

1. Page 2, last paragraph, the field investigation must be realistic to reasonably and confidently characterize the site. Furthermore, assumptions are needed to achieve the objectives. If the investigation results indicate the need for additional investigation what the purpose of that investigation will be? When will it be undertaken? Will it meet the current schedule?
2. Page 31, last paragraph, what do you do with the drill cutting? How do you treat the ground water from aquifer pump test?

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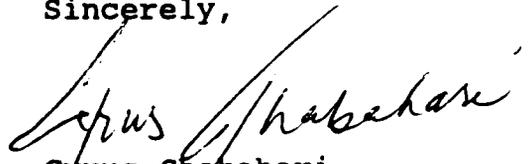
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Should you have any questions, please call me at (510)
540-3821.

Sincerely,


Cyrus Shabahari
Waste Management Engineer
Site Mitigation Branch

cc: U.S. EPA
Region IX
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Mail Code H-2-9
75 Hawthorne Street
San Francisco California 94105