



N00296.001400
MOFFETT FIELD
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

May 15, 1992

Stephen Chao
WestDiv Engineer in Charge
Department of the Navy
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Bldg. 101
San Bruno, CA 94066-0720

Dear Mr. Chao:

The U.S. Environmental Protection Agency has completed its review of the Draft Final Field Sampling Plan and Quality Assurance Project Plan for the NAS Moffett Field NPL site. The enclosed comments were prepared by our representative, SAIC. If you have any questions regarding our comments, please call me at (415) 744-2385. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Roberta Blank".

Roberta Blank
Remedial Project Manager

cc: Cyrus Shabahari, DTSC
Elizabeth Adams, RWQCB

Admin Record

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E/N 45



Science Applications International Corporation
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Technology Services Company

May 6, 1992

DCN: TZ4-C09015-RN-M11902

Ms. Roberta Blank (H-9-2)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Ref: EPA Contract No. 68-W9-0008; EPA Work Assignment No. C09015
SAIC/TSC Project No. 06-0794-03-0630
Response to Comments - Draft Final Field Sampling Plan

Dear Roberta:

The responses by PRC Environmental Management, Inc. (PRC) to SAIC/TSC's comments on the referenced document have been addressed. It is the opinion of SAIC/TSC that some of the responses are not adequate and, therefore, require further discussion. Following are SAIC/TSC's comments on PRC's responses:

GENERAL COMMENTS

Risk Assessment

Comment/Response No. 2: Data should be collected now that will be useable should a future risk assessment be warranted. Examples would be attaining health based action levels required for a risk assessment and the collection and analysis of unfiltered groundwater samples for metals analysis. All of the field work and data collected should be driven by the risk assessment or NAS Moffett Field may find that considerable effort expended has not been adequate to meet risk assessment goals.

Comment/Response No. 3: If PRC's Standard Operating Procedure (SOP) is not relevant to the work being performed at NAS Moffett Field, then the language in it should be modified accordingly.

Comment/Response No. 4: If PRC is unable to incorporate James M. Montgomery, Inc.'s (JMM's) SOPs for the cone penetrometer and HydroPunch methods into the Field Sampling Plan (FSP), then the manufacturer's recommended methodologies should be included. At the very least a reference to the reader should be provided in the text, directing them to the manufacturer's operating procedures.

Ms. Roberta Blank
May 6, 1992
Page 2



Comment/Response No. 5: PRC should include a statement in the FSP about addressing special requirements (example, Santa Clara Valley Water District) should they arise during the investigation. This citation can refer the reader to the site specific work plan(s).

Comment/Response No. 6: If Electromagnetic Induction (EM) and Magnetometry (MAG) are not to be used during the field investigations at NAS Moffett Field, then discussion of them in the FSP should be removed. If they need to remain due to possible future use, then a statement about utilizing manufacturer's recommended methodologies should be included. At such time that EM and MAG have been chosen for use, PRC should have developed SOPs.

Note: PRC did not address Tables 2 and 3 and SAIC/TSC's corresponding comments. Did PRC receive these tables and comments from EPA?

All responses not addressed above were sufficiently answered by PRC to the satisfaction of SAIC/TSC.

If you have any questions regarding this matter, please call me at (415) 399-0140.

Sincerely,

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
Technology Services Company

A handwritten signature in cursive script that reads "Fred Molloy". The signature is written in dark ink and is positioned above the typed name and title.

Fred Molloy
Work Assignment Manager

FM/vr



Science Applications International Corporation
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Technology Services Company

May 15, 1992

DCN: TZ4-C09015-RN-M12095

Ms. Roberta Blank (H-9-2)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Ref: EPA Contract No. 68-W9-0008; Work Assignment No. C09015
SAIC/TSC Project No. 06-0794-03-0630
Review of Revised NAS Moffett Responses to EPA
Comments on the Draft Final Quality Assurance Project Plan (QAPjP)

Dear Roberta:

Enclosed is the technical review of the referenced comments. Only those comments that SAIC/TSC felt were deficient to some degree are discussed. All other responses were acceptable. This review was performed by Sebastian Tindall, SAIC/TSC's Senior Environmental Scientist.

If you have any questions on the enclosed, please call me at (415) 399-0140.

Sincerely,

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
Technology Services Company

A handwritten signature in cursive script that reads "Fred Molloy". The signature is written in black ink and is positioned above the typed name and title.

Fred Molloy
Work Assignment Manager

FM/vr

Enclosure

copy: File

REVIEW OF REVISED
RESPONSES
TO THE ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE
DRAFT FINAL QUALITY ASSURANCE PROJECT PLAN
NAS MOFFETT FIELD
MAY 1992

Submitted To:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105

Submitted By:

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
TECHNOLOGY SERVICES COMPANY
20 CALIFORNIA STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94111

EPA CONTRACT NO. 68-W9-0008
EPA WORK ASSIGNMENT NO. C09015
SAIC/TSC PROJECT NO. 06-0794-03-0630

GENERAL COMMENTS

Original EPA
Comment

Response

1. Response does not fully address EPA Region IX Guidance for Preparing Quality Assurance Project Plans for Superfund Remedial Projects (No. 9QA-03-89). See Section II, page 1-2, B. Data Usage: "What data are needed and how will they be used? List or explain the following:

- The intended uses of the data, in order of importance.
- The decisions to be made for which the data are needed.
- The users of the data and the decision makers."

Are the uses given in the NAS Moffett (Moffett) response listed in order of importance?

Is the list complete? Are the data to be used in Risk Assessment?

What are the expected decisions?

Who will be the data users?

Who will be the decision makers?

1. The intent of EPA Region IX in preparing 9QA-03-89 (see: Introduction, page 3) was to contain all elements of EPA Guidance: Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans (QAMS-005/80). Furthermore, contrary to the Moffett response, traceability of standards is required by Region IX guidance (see Section II, page 7 of 9QA-03-89, Calibration Procedure and Criteria). Therefore, the Quality Assurance Project Plan (QAPjP) should list the calibration standards to be used and their sources, including traceability procedures (see QAMS-005/80, Section 5.8, page 8).

the laboratory(s) should be listed, by name, and described in
the QAPjP (see 9QA-07-89, Section II, Page 4).