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N00296.001416
MOFFETT FIELD
SSIC NO. 5090.3.A.

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APR 22 2008

Alana Lee
Project Manager
USEPA Region IX, Superfund Division
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**SUBJECT: EXPLANATION OF WELLS NOT SAMPLED AND PLAN TO OBTAIN
DATA FROM MISSING WELLS, MIDDLEFIELD-ELLIS-WHISMAN (MEW)
REGIONAL GROUNDWATER REMEDIATION PROGRAM MOUNTAIN
VIEW AND MOFFETT FIELD, CALIFORNIA**

Dear Ms. Lee:

The Navy is submitting this response to your letter dated April 9, 2008 requesting the following information related to groundwater monitoring at the MEW Regional Groundwater Remediation Program:

1. Explanation of the full scope of groundwater sampling that was not conducted;
2. Justification for failing to sample the wells;
3. Reasons why the parties should not be held strictly accountable for failing to comply with the sampling and notification requirements; and,
4. Plan, including a schedule, to mitigate the effects of the failure to sample these wells during 2006 and 2007.
5. Navy assurance that replacement wells will be sampled as part of the ongoing Regional Program.

Our responses are detailed below.

1. The full scope of sampling of the MEW and Regional Groundwater Remediation Program (RGRP) groundwater remediation systems that was not conducted includes total 27 groundwater wells in 2006 and 30 groundwater wells in 2007.
2. The Navy did not sample the monitoring wells because these wells are not part of the Navy's long term groundwater monitoring plans as listed in the references below. The Navy detailed the wells to be sampled as part of the Long-Term Groundwater Monitoring Plan (LTGMP) (TtFW 2004) and the associated sampling and analysis plans (TN&A 2006a, 2006b, FWENC 2003, TtECI 2003a, 2003b).

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3. The Navy should not be held accountable because we are not responsible for sampling wells that are not included in our LTGMP.
4. The Navy will support MEW's effort by providing access to all Navy wells and by helping the MEW companies locate wells.
5. Navy can not provide assurance that replacement wells will be sampled as part of the ongoing Regional Program. Decommissioned wells 89-3, 89-4, and 89-13 were not part of the Navy's LTGMP.

Please feel welcome to contact Julie Crosby at (619) 532-0929, or me at (619) 532-0963 if you have any further questions.

Sincerely,



DARREN NEWTON
BRAC Environmental Coordinator
By direction of the Director

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REFERENCES

TN and Associates, Inc (TN&A). 2006a. Final Addendum 1 to Sampling and Analysis Plan (field Sampling Plan / Quality Assurance Project Plan) for West-side Aquifers Treatment System Long-term Groundwater Monitoring at Installation Restoration Site 28 Former Naval Air Station Moffett Field Mountain View, California June.

Tetra Tech FW, Inc. (TtFW). 2004. Final West-Side Aquifers Treatment System Long-Term Groundwater Monitoring Plan, Former Naval Air Station Moffett Field, Moffett Field, California. Revision 2. Contract No. N68771-98-D-5713, Contract Task Order No. 0071. September 30.

Foster Wheeler Environmental Corporation (FWENC). 2003. Final Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) for Final West-Side Aquifers Treatment System Long-Term Groundwater Monitoring Plan, Former Naval Air Station Moffett Field, Moffett Field, California. Revision 0. Contract No. N68771-98-D-5713, Contract Task Order No. 0048. December 4.

TN&A 2006b. Final Addendum 1 to Sampling and Analysis Plan (Field Sampling Plan / Quality Assurance Project Plan) for Evaluation of East-side Aquifer Treatment System at Installation Restoration Site 26 Former Naval Air Station Moffett Field Mountain View, California. May

Tetra Tech EC, Inc. (TtECI). 2003a. Final East-Side Treatment System Evaluation Work Plan. Revision 0. January 14.

TtECI. 2003b. Final Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) for Final East-Side Treatment System Evaluation Work Plan, Former Naval Air Station Moffett Field, Moffett Field, California. Revision 0. January 14.

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