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Ser 09ER5SD/5160  
February 8, 1995

Ms Diane Shelander  
National Aeronautics and Space Administration  
Ames Research Center  
Moffett Field, California 94035

Subject: Proposed NASA Electrical Upgrade Project, Moffett Federal Airfield

Dear Ms. Shelander:

The Navy has reviewed the proposal by the National Aeronautic and Space Administration (NASA) for excavation activities related to upgrading the electrical substation switch gear "C" on the western side of Moffett Federal Field per your letter of 29 December 1994. In general, the Navy concurs with the siting for the proposed project. However, we have three comments on the proposal:

1. The project site overlies the regional volatile organic compound (VOC) groundwater plume from the Middlefield-Ellis-Whisman (MEW) companies. Consequently, the excavated soil may contain low level of VOCs attributable to the groundwater. However, it is unlikely that the concentrations in the soil will be above action levels (for example, 500 micrograms per kilogram for trichloroethene (TCE) stated in the MEW record of decision). Therefore, it is also unlikely that any excavated soil will require treatment.

There are no known or suspected Navy VOC contaminant sources in this part of the regional plume and in accordance with the memorandum of understanding (MOU) with NASA, the Navy should not be responsible to treat these soils if they contain VOC above action levels solely because of the underlying contaminated groundwater. However, if a previously unidentified contaminant source is discovered, remediation would remain the Navy's responsibility.

2. The volume of soil expected to be excavated is not consistently estimated in the proposal. The cover letter states that approximately 10,000 cubic feet (370 cubic yards) of soil will be excavated. However, page 2 of the detailed project description (see the section entitled "will groundwater be encountered") indicates that the trench will be 2,000 feet long by 5 feet wide by 5 feet deep. This would be 50,000 cubic feet (1,852 cubic yards). Clarification of the estimated excavation volume is important in considering the potential need for soil treatment discussed above.

Subj: Proposed NASA Electrical Upgrade Project, Moffett Federal Airfield

3. It is unlikely that the groundwater will be encountered in the excavation. Monitoring of the groundwater elevation in the shallowest (A1-aquifer) zone indicated that the depth to water is approximately 8 to 15 feet below ground surface in the proposed excavation area. However, NASA's contingencies to address groundwater, if it is encountered, are warranted.

If you have any question, please call Mr. Su Don Tu of my staff at (415) 244-2541.

Sincerely,

**ORIGINAL SIGNED BY**

STEPHEN CHAO  
BRAC Environmental Coordinator

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