



March 12, 1996

Mr. Stephen Chao and Mr. Hubert Chan
Department of the Navy
Engineering Field Activity West
Naval Facilities Engineering Command
900 Commodore Drive, Building 208
San Bruno, California 94066-5006

CLEAN Contract Number N62474-88-D-5086 (CLEAN I)
Contract Task Order 0236

Subject: Responses to Comments on the Operable Unit 1 Draft Field Work Plan, Moffett Federal Airfield

Dear Messrs. Chao and Chan:

Enclosed are three copies of the above-referenced document. By cover of this letter, copies of these responses have also been sent to the appropriate regulatory agency personnel.

If you have any questions, please call us at (303) 312-8846 (Peters) or (303) 312-8857 (Young).

Sincerely,

for Thomas J. Peters, P.E.
Project Engineer

Michael N. Young
Project Manager

TEM/mlr

Enclosure

cc: Distribution List (attached)

**Operable Unit 1 Draft Field Work Plan
Moffett Federal Airfield**

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**NAVY RESPONSES TO AGENCY COMMENTS
ON THE
OPERABLE UNIT 1 DRAFT FIELD WORK PLAN
MOFFETT FEDERAL AIRFIELD, CALIFORNIA**

This report presents the Navy's responses to California Environmental Protection Agency, Department of Fish and Game (DFG), and Department of Toxic Substances Control (DTSC) comments on the November 10, 1995 Operable Unit 1 Draft Field Work Plan for Moffett Federal Airfield (MFA), California. The comments were received in letters from DFG dated January 16, 1996, and from DTSC dated January 8, 1996.

RESPONSES TO COMMENTS FROM DFG

Comment 1: The draft field work plan (DFWP) (page 9), indicates that "if two or more discrete, coarse intervals are indicated by the cone penetrometer test (CPT), the Hydropunch (HP) sample will be taken from the thickest interval." The patterns of leachate migration are dependent upon the precise actions of groundwater hydrology which are not well understood at this site. Thinner and coarse soils at shallow depths may be a more important leachate migration pathway to fish and wildlife resources than thicker and coarse soils at deeper levels. There may be other factors that control leachate migration which vary among sampling points. The DFWP states that further tests may be necessary based upon the findings of the additional CPT and HP sampling. DFG recommends HP sampling at every station where coarse soil intervals are detected by CPT.

Response: As stated on page 5 of the DFWP, the Navy has proposed HP sampling at every location where saturated permeable sediments are encountered by CPT. The statement on page 9 provides a procedure for circumstances where more than one discrete coarse interval is discovered at a CPT location. This procedure was selected because thicker coarse intervals are generally more continuous than thinner intervals, and larger masses of contaminants are more likely to migrate significant distances through the thicker coarse intervals. The Navy recognizes that leachate migration along thin coarse intervals can occur. However, the costs associated with sampling and analyzing groundwater samples from every discrete interval at 27 locations would be prohibitive.

Comment 2: The DFWP (page 12), acknowledges that the total number and locations of monitoring wells will depend upon CPT and HP sampling results. DFG recommends the delay of the selection of monitoring wells and installation until after the CPT and HP sampling results have been presented.

Response: Page 12 of the DFWP states that "CPT and HP sampling results will be presented in a letter report along with proposed monitoring well locations for review and concurrence prior to installation."

Comment 3: The DFWP (at page 16), indicates that the trenching locations at Sites 1 and 2 landfill boundaries are not precisely determined at this time. The DFWP indicates that precise trenching locations will be determined during a future site inspection. The DFWP indicates that it may be necessary to conduct further trenching when the boundaries for the landfills at Sites 1 and 2 are better defined. DFG agrees that this approach appears to be adequate to achieve DFWP goals.

Response: Comment noted.

Comment 4: Regarding the proposed radiological surveys for Sites 1 and 2, the DFWP (pages 16 and 17). indicates that these surveys will be designed after the basewide background radiological survey has been completed. Because radionuclides may cause adverse effects on the State fish and wildlife resources, DFG is interested in the results of the radiological surveys for this and other sites on the facility. DFG recommends review of the background radiation surveys results for Sites 1 and 2. In addition, DFG recommends review and comment on the adequacy of the proposed radiological surveys at Sites 1 and 2.

Response: The findings from field activities described in this work plan will be presented to the agencies in a report before the landfill-caps are constructed.

RESPONSES TO COMMENTS FROM DTSC

Comment 1: As it was suggested by the State of California in October 1995, a conceptual model, incorporating detailed cross-sections of the Site 1, should be presented to demonstrate the potential pathway and how this additional investigation will close existing data gaps.

Response: Detailed cross sections of Site 1 are provided in the OUI feasibility study and the Site 1 remedial investigation. A detailed cross-section of Site 1 will be included in the technical memorandum to be prepared following this additional investigation.

Comment 2: The state recommends the Navy to include target dates in Section 8.0.

Response: The target dates have been included in Section 8.0 of the draft-final work plan.