



August 7, 1997

Department of  
Toxic Substances  
Control

700 Heinz Avenue  
Suite 200  
Berkeley, CA  
94710-2737

Commander  
Department of the Navy  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
Attn: Mr. Stephen Chao, Project Manager  
900 Commodore Drive, Bldg. 210  
San Bruno, California 94066-2402

Pete Wilson  
Governor

James M. Strock  
Secretary for  
Environmental  
Protection

Dear Mr. Chao:

**DRAFT SITE 2 SAMPLING PLAN, MOFFETT FEDERAL AIRFIELD,  
JULY 24, 1997**

The Department of Toxic Substances Control (DTSC) and the San Francisco Regional Water Quality Control Board (RWQCB) have reviewed the subject document and prepared the following comments:

1. Page 1, last Paragraph; Section 1.0

Metal analysis should be included in the sampling plan. In addition, the EPA Region 9 preliminary remediation goals (PRGs) should be followed as cleanup levels for metals as well.

2. Page 1, last Paragraph; Section 1.0

Please explain why 1 mg/kg was chosen by NASA and the Navy as cleanup level for polychlorinated biphenyls (PCBs).

3. Page 3, 2nd Paragraph; Section 2.0

Please see Comment Number 1.

4. Page 3, 3rd Paragraph; Section 2.0

Based on the Navy's latest field observation that a larger area at Site 2 will be excavated than it was envisioned before. Therefore, the Navy proposed to change sampling frequency to 10,000 square feet per sample. The Navy shall prepare a revised sampling plan to ensure that sufficient amount of confirmatory samples will be collected to meet different sampling objectives.

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5. Page 3, 3rd Paragraph; Section 2.0

If confirmatory sampling results are above cleanup levels, continuing excavation in conjunction with a higher density of confirmatory sampling are required to determine the final extent of excavation.

If you have any questions regarding these comments, please call me at 510-540-3830 to ensure a coordinated approach for all regulatory comments.

Sincerely,



C. Joseph Chou  
Remedial Project Manager  
Base Closure Unit  
Office of Military Facilities

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