

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
2151 BERKELEY WAY, ANNEX 9
BERKELEY, CA 94704



August 15, 1990

Mr. Stephen Chao
Department of the Navy
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Building 101
San Bruno, CA 94066-0720

Dear Mr. Chao:

IS 8 and IS9 Draft Workplan, Naval Air Station, Moffett Field

Please find enclosed the Department of Health Services' (DHS) comments to the IS8 and 9 Workplan. If you have any questions regarding these comments please call me at (415) 540-3818.

Sincerely,

Handwritten signature of Lynn Nakashima in cursive.

Lynn Nakashima
Associate Hazardous Materials
Specialist
Region 2
Toxic Substances Control Program

enclosure

cc: Lewis Mitani
U.S. EPA, Region 9
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Wil Bruhns
Regional Water Quality Control Board
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ADMIN. RECORD

D/N 08

Comments to IS 8 and 9 Workplan
NAS Moffett Field

General Comment:

1. A table should be included describing what each type of sample will be analyzed for. In addition, the name of the laboratory that will be used should be included. A California State Certified Lab (certified for all analyses requested) must be used in order for the data to be acceptable.

Specific Comments:

1. Page 17, section 2.3, sentence 2: Indicate on a map the locations of soil borings 5C and EB-32.
2. Page 18, section 2.3.2, first sentence: This sentence makes no sense, please re-write.
3. Page 18, section 2.3.2, fourth sentence: This sentence makes no sense. What does "as measured from well 68B1" mean? Please re-write.
4. Page 19, Table 1: Please explain the heading "Soil Boring". Was boring 5C taken from Well 75A, 68B1 or 5C? The same comment applies to boring EB-32.
5. Page 21, Table 2: This data needs to be explained. Include when the results were obtained and reference from what document.
6. Page 35, paragraph 1, second sentence: The B1 and B2 aquifer wells should be referenced.
7. Page 35, paragraph 1, third sentence: In order for this conclusion to be drawn, the dates of the well samplings should be included in the text.
8. Page 35, section 2.4.1, paragraph 2: There is no plate 1.2-5.
9. Page 36, paragraph 2, sixth sentence: Include a figure showing the location of the regional plume (both A and B1 aquifers).
10. Page 36, paragraph 2, seventh sentence: Well RW5A is not located on figure 8. Please revise the figure.
11. Page 37, section 2.4.2.2, first bullet: Indicate on figure 8 where MEW-76(A) is located.

12. Page 40, section 3.3: Add Well 67-B1 to the list of existing wells that will be sampled. Well 67-B1 is upgradient of IS9 and TCE has been detected in the well.
13. Page 46, last paragraph: Explain what will occur if the soil gas values do not correlate with ground water results.
14. Page 53, first paragraph, seventh sentence: Polyethylene tubing could cause contamination of the soil gas sample. Tygon or teflon tubing should be used.
15. Page 55, paragraph 5: Reference the section that describes how and where the equipment will be decontaminated.
16. Page 57, section 4.3.3.2, paragraph 2: This paragraph should also include the rationale for using a 0.010 inch slot well screen.
17. Page 57, section 4.3.3.2, paragraph 3, second sentence: The filter pack may only extend a maximum of three feet above the top of the screen, not a minimum.
18. Page 57, section 4.3.3.2, paragraph 3, third sentence: The bentonite pellets should be allowed to hydrate for a minimum of 1/2 hour before the grout seal is placed. In acidic conditions, pH < 7.0, at least 45 minutes is needed for sufficient hydration to occur.
19. Page 58, section 4.3.3.3, paragraph 1, sentence 3: Swabbing to develop wells is not allowed as it may cause the well to collapse.
20. Page 65, section 4.3.8: Combustible gas indicators need to be included in this section (Calibration and Maintenance).
21. Page 66, section 4.3.8.5: PID meters shall be calibrated, at a minimum, at the beginning of the day and again after field activities have finished at the end of the day.
22. Page 68, section 4.4.1.1: Specify what "precleaned containers" refers to. What specifications will they meet?
23. Page 89, section 4.6.1, second paragraph: Decontamination water may not be discharged to the ground unless it has been proven not to be a hazardous waste. All decontamination water must be collected and analyzed prior to disposal.
24. Page 89, section 4.6.2, last sentence: Water samples will not adequately characterize the degree of contamination of saturated soils. These soils will have to be analyzed separately and then a hazardous waste determination made prior to disposal.

25. Page 100, section 5.1.3.2, Soil Gas Surveying: Inhalation of released vapors may be a possible route of exposure during the soil gas survey. Air monitoring should be done while this activity is in progress.
26. Page 107, first paragraph, third bullet: In addition to monitoring for vinyl chloride to determine whether to upgrade the level of PPE, TCE should also be monitored for. TCE should also be a contaminate of concern since it is suspected to be most prevalent at these sites.
27. Appendix B: El Camino Hospital is located on Grant Road, not Grand Road.