

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
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April 25, 1991

Mr. Stephen Chao
Department of the Navy
Western Division
Naval Facilities Engineering Command
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NAS MOFFETT FIELD, SOIL PILES CHARACTERIZATION FIELD WORK PLAN

Dear Mr. Chao:

Upon reviewing the Moffett Field, Soil Characterization Field Work Plan, the Department of Health Services (DHS) has the following comments.

- I. The Sampling and Analysis Plan (SAP) does not provide an adequate discussion on the sampling procedures. A step by step process and preplanning is necessary to ensure the accuracy and reliability of such undertaking to achieve desirable results. The SAP does not provide a clear picture as how taking a sample every 50 cubic yards will be performed in the soil piles. Collecting composite samples by mixing the discreet samples will cause volatilization and misrepresent the contamination level of the soil piles. We prefer to use 95 percentile of discreet sample results to characterize the soil piles.
- II. Page 3, last paragraph, although the paragraph mentioned "other samples", there is no further discussion as to what these samples might be.
- III. Page 7, last paragraph, the first three sentences of the paragraph fails to explain the difference between collected samples for chemicals and "samples collected for other chemicals..." A clarification is necessary.
- IV. Health and Safety Plan (HSP), must address all aspect of the project . It is a plan that should stand on its own. Hence, the HSP fails to adequately address some necessary issues. These are:
 1. The HSP plan should summarize the operational and health and safety responsibilities of each key person identified. It should include the reporting relationships of all personnel, the extent of the Site Safety Officer's (SSO) authority to correct health and safety problems and the overall project responsibilities of the SSO.

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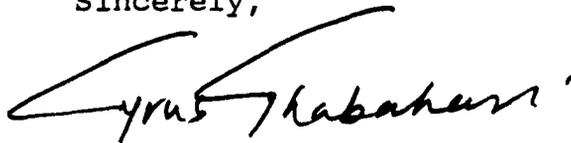
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2. A concise description (narrative) of the primary health risks associated with chemical, physical and toxicological characteristics of concern contaminants is necessary. These are, for example, vapor pressure, odor threshold, expected potential routes of entry, physical state expected, target organs, acute and chronic effects. This narrative then, may be augmented by a quick reference chart of chemical hazards, including PELs, TLVs, RELs, for each contaminant.
3. An area map is needed with exclusion, contamination reduction and support zones outlined, and the location of the decontamination area.
4. The personal levels of protection are contradictory. On page A-14, it states that if the toxic organic vapors are 0-60 ppm above background, level D will be used; however, on page A-49 it states such high levels require level B protection. The same contradiction exists for level C protection. These contradictions must be clarified.
5. A detail decontamination procedures to be used for personnel, personal protective, sampling, and construction equipment needs to be included in the SSP.

If you have any questions please call me at (415) 540-3821.

Sincerely,



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Admin Record.