



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

July 13, 1994

Mr. Stephen Chao  
Naval Facilities Engineering Command  
Western Division  
900 Commodore Way, Bldg. 101  
San Bruno, CA. 94066

Re: Draft Phase II Additional Sites Investigation Field Work Plan, dated May 25, 1994

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and submits the following comments. Call me at 415-744-2383 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Gill".

Michael D. Gill  
Remedial Project Manager  
Federal Facilities Cleanup Office

cc: C. Joseph Chou (DTSC)  
Ken Eichstaedt (URS)  
Ron Gervason (RWQCB)  
Sandy Olliges (NASA)  
Peter Strauss (MHB)  
Mike Young (PRC) (Fax)

## Moffett Field Draft Phase II Additional Sites Investigation Field Work Plan, dated 5/25/94

### General Comments

1. This document serves as a guide in directing field activities during Phase II of the Additional Sites Investigation. It includes investigation at three additional sites: the Zook Road Fuel Spill Site, Patrol Road ditch and the Golf Course Landfill 2. The locations of soil, sediment and groundwater sampling look acceptable. But the Navy needs to reassure the regulatory agencies that at least the following sites will be investigated before the Site Wide Remedial Investigation is completed:
  - a. the highly secure area in the vicinity of the Site 2 landfill (weapons bunkers?)
  - b. the fourth landfill at the Site 5 (Fuel Farm) end of Patrol Rd. and
  - c. the potential "runway wetland".

### Specific Comments

1. Section 4.1.1, page 7, para 1. The text says that the soil borings collected from the landfill material will be analyzed for radionuclides. This is acceptable, but we don't recall any other soil samples being analyzed for radionuclides at Moffett Field. Is there any rationale for this analysis?
2. Section 4.1.1, page 7, para 1. The soil sample locations from non-refuse materials that are to be used for establishing background levels should be included in the text. It should be noted that these sample concentrations, especially since they may be from fill material, may not be accepted by the regulatory agencies as legitimate background values since, as you are aware, decisions have been made in the past using previously agreed upon offsite background values (at least for inorganic materials).
3. Section 4.3.1, page 12, para 1. "Groundwater samples collected from these wells will be analyzed for... radionuclides...". As in the soil samples, is there any rationale for this analysis?
4. Section 4.6, page 13. Please provide more detail regarding the state and federal guidelines to be followed for waste disposal.
5. Section 6.7, page 31. Attachment 4 of this document (the Illness and Injury Prevention Program) has every other page missing; only the odd pages were included in our copy.
6. Section 7.0, page 32. Please provide a more detailed schedule of activities, such as a timeline chart. Please include any additional work necessary for other sites as well, such as those mentioned in general comment #1.