

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

DIVISION 2
HEINZ AVE., SUITE 200
KELSFER, CA 94710-2737

January 16, 1996

Commander
Department of the Navy
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Stephen Chao, Project Manager
900 Commodore Drive, Bldg. 101
San Bruno, California 94066-2402

Dear Mr. Chao:

DRAFT OUI FIELD WORK PLAN, MOFFETT FEDERAL AIRFIELD

Enclosed please find comments prepared by the Department of Fish and Game (DFG). 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. In addition, the State also recommends the Navy to include target dates in Section 8.0. Please incorporate all comments in the final field work plan. If you have any questions, please call me at 510-540-3830.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Joseph Chou".

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

Enclosure

cc: Mr. Michael Bessette
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Mr. Michael D. Gill
U.S. Environmental Protection Agency
Region IX, Mail Stop H-9-2
75 Hawthorne St.
San Francisco, California 94105

Mr. Stephen Chao
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Mr. Bob Radovich
Environmental Specialist/Wetlands Coordinator
Department of Fish and Game
Environmental Services Division
1416 Ninth Street
Sacramento, California 95814

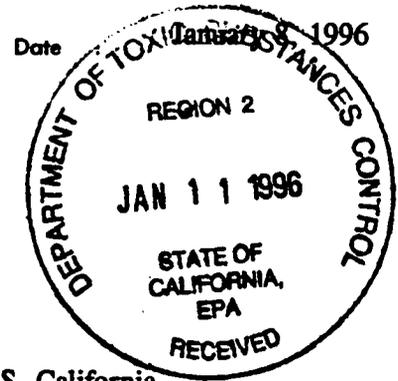
Ms. Sandy Olliges
Assistant Chief
Safety, Health and Environmental Services
National Aeronautics and Space Administration
Ames Research Center
Moffett Field, CA 94035-1000

Mr. Peter Strauss
MHB Technical Associates
1723 Hamilton Avenue, Suite K
San Jose CA 95125

Mr. James G. McClure, Ph.D.
Moffett Field RAB, THE Committee
c/o Harding Lawson Associates
P.O. Box 6107
Novato, California 94948

Memorandum

Mr. Joseph Chou
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, California 94710



From : Department of Fish and Game

Subject : Operable Unit 1, Draft Field Work Plan (DFWP) Moffet Field NAS, California
(5920/60120/NTX 405 00: 12)

The Department of Fish and Game (DFG) has reviewed the subject document which describes a plan for investigation of groundwater to assess leachate migration from Site 1 into the A1-aquifer; a trenching plan for determination of Sites 1 and 2 landfill boundaries; and a plan for surveying radionuclides at Sites 1 and 2.

In general, the document discusses a standard approach for accomplishing work plan goals. The following DFG comments and suggestions describe those instances in the report where DFG disagrees with the author's conclusions and recommendations.

The DFWP (page 6), recommends a strategy to evaluate ground water flow with the use of sampling with cone penetrometer tests (CPTs) and hydro punch sampling (HP). Recent data from mapping surveys indicate that leachate may migrate in bans as narrow as 25 feet in width. DFG agrees with the recommendation to increase the number of CPTs and HPs at 20 foot intervals to characterize the leachate migration patterns.

The DFWP (page 9), indicates that "if two or more discrete, coarse intervals are indicated by the CPT, the 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.

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.

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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.

Regarding the proposed radiological surveys for Sites 1 and 2, the DFWP (pages 16 & 17), indicates that these surveys will be designed after the basewide background radiation survey has been completed. Because radionuclides may cause adverse effects on 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.

If you have questions or wish to discuss this matter further, please contact Bob Radovich, Environmental Specialist IV, at (916) 653-2588 or write him at the Department of Fish and Game, 1416 Ninth Street, Sacramento, California 95814.



John L. Turner, Chief
Environmental Services Division

cc: Department of Fish and Game

Ms. Ann Malcolm
Sacramento

Dr. Michael Martin
Monterey

Mr. Carl Wilcox
Yountville

Department of Toxic Substance Control

Ms. Laura Valoppi
Sacramento