



**San Francisco Bay
Regional Water
Quality Control
Board**

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Regional Water
Quality Control
Board**

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MOFFETT FIELD
SSIC NO. 5090.3



April 4, 1998

File No. 2189.8009 (CJC) Pete Wilson
Governor

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Stephen Chao
900 Commodore Drive
San Bruno, CA 94066-2402

**Subject: Additional Investigation, Site 22, Draft Field Work Plan, Moffett Federal
Airfield, March 4, 1998**

Dear Mr. Chao:

The San Francisco Bay Regional Water Quality Control Board (RWQCB), in conjunction with the Integrated Waste Management Board (IWMB), has reviewed the subject report. Please incorporate the enclosed IWMB comments in the final work plan. If you have any questions on these comments, please contact me at (510) 286-1035 or Mr. Glenn Young at (916) 255-3830.

Sincerely,

C. Joseph Chou
Remedial Project Manager

Enclosure

cc:
Mr. Glenn Young
Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826

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



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

Mr. James G. McClure, Ph. D.
Moffett Field RAB, THE committee
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Novato, CA 94949-5704

Mr. Peter Strauss
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Cal/EPA

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Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

March 19, 1998

Mr. Joseph Chou ✓
San Francisco Bay Area Regional Water Quality
Control Board (RWQCB)
2101 Webster Street-Suite 500
Oakland, CA 94612

Subject: Moffet Federal Airfield, California, Additional Investigation, Site
22, Draft Field Work Plan, March 4, 1998

Dear Mr. Chou:

The California Integrated Waste Management Board (IWMB) appreciates the opportunity to provide you with input for the subject report. IWMB staff has reviewed the Draft Additional Investigation Site 22 Draft Field Work Plan and has the following comments:

3.2 Site 22 Characterization

EPA's Guidance regarding limited characterization based on use of the presumptive remedy is primarily with respect to collecting soil and groundwater data to develop risk factors. The purpose of an intrusive investigation of the landfill is to obtain data on the horizontal and vertical extents of subsurface waste to quantify engineering estimates for clean-closure, consolidation and capping. Intrusive investigation also provides useful data on the actual waste characteristics, i.e. through visual observation and air monitoring. It has been IWMB's experience through several landfill closures in California, that intrusive investigation has been performed primarily as preconstruction activities prior to closure construction, i.e. capping. In CERCLA actions however, the data from an intrusive investigation can be very useful in defining realistic remedial options during the Feasibility Study (FS) phase.

4.3 Exploratory Trenching

In general, this section provides adequate procedures for conducting an intrusive investigation. IWMB staff suggest that consideration be given to performing 6-8 additional trenches (see attached drawing) to "fill in the gaps", as the cost of mobilization and demobilization of equipment and personnel can be maximized by expanding the workscope to collect as much field data as possible. In other words a backhoe and operator should be able to perform 16 trenches (assuming 25 ft long x 4 ft wide x 6 ft deep or 400 linear feet) and backfill within a 3-4 day



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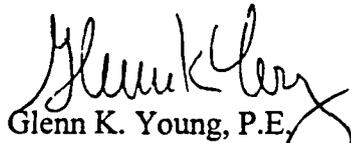
period. Also, it is usually more cost effective to rent equipment (including an operator) at a weekly rate than a daily rate. The going weekly rate for a backhoe and backhoe operator (not in LEVEL C) according to current CALTRANS equipment rental rates \$1500-\$2000/week.

5.4 Health & Safety

IWMB staff recommend that the work crews performing trenching and drilling work begin in Level C and downgrade to Level D based on air monitoring results. Also IWMB recommend that in addition to a photoionization detector (PID) that a combustible gas indicator (CGI) be used to monitor for explosive conditions in the trench.

IWMB staff look forward to working with your agency on the implementation of a remedial project at this site which will satisfy all applicable or relevant and appropriate requirements. IWMB staff would like to observe trenching activities and request notification of the start-date and schedule for work. If you have any questions please feel free to contact me at (916) 255-3830.

Sincerely,



Glenn K. Young, P.E.
Remediation, Closure & Technical Services
Permitting & Enforcement Division