

National Aeronautics and  
Space Administration  
**Ames Research Center**  
Moffett Field, CA 94035-1000



Reply to Attn of: QE:218-1

SEP 28 2001

Ms. Andrea Muckerman  
BRAC Environmental Coordinator  
Southwest Division  
Naval Facilities Engineering Command  
BRAC Operations Office  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101-8517

Subj: ORION PARK AND WESCOAT HOUSING AREA WORK PLAN

Dear Ms. Muckerman:

NASA has received and reviewed the following document from the Navy: Draft Site Characterization and Baseline Health Risk Assessment Work Plan for Orion Park and Wescoat Housing Areas. The review comments are enclosed as Attachment 1 with this letter.

Thank you for the opportunity to review this document and provide you our comments. If you have any questions please call me at 650-604-0237.

Sincerely,

A handwritten signature in blue ink that reads "Donald M. Chuck".

Donald M. Chuck  
Environmental Services Office

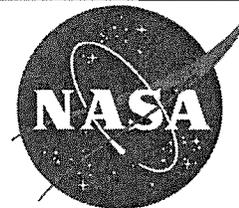
Encl: Attachment 1

cc: Angela Patterson, SWDIV  
Alana Lee, EPA  
Adriana Constantinescu, RWQCB  
Pete Everds, FW  
Sandy Olliges, NASA

# ATTACHMENT 1

DESIGN AND DOCUMENT REVIEW - COMMENTS

COMMENTS BY Don Chuck			CODE QE	PHONE 650-604-0237	JOB ORDER NO.
PROJECT TITLE AND LOCATION Draft Site Characterization and Baseline Human Health Risk Assessment Work Plan for Orion Park and Wescoat Housing Areas Moffett Field, CA Foster Wheeler Environmental Corporation 9/14/2001			DATE 9/25/2001		



## GENERAL COMMENTS

This work plan does not include the installation of any groundwater monitoring wells. There should at a minimum be three wells installed in the Orion Park Housing Area (OPHA) to help determine changes in groundwater flow and chemical concentrations over time.

The schedule provided in Table 1-1 does not seem to reflect the field work described in the text. The text describes the investigation to be done in two phases. The work in Phase 2 will be based on the data collected during Phase 1. Table 1-1 does not show this division. Additionally, time needs to be added to the schedule to allow parties to review Phase 1 data, to allow the Navy to produce the work plan addendum, and for parties to review the addendum.

It is unclear how the present work plan will fulfill objective 2: "identify and/or confirm potential sources" for the TCE, especially at OPHA. Unless an unknown source appears during this investigation at OPHA, this objective will not be met. Records search and aerial photograph study of the surrounding area should be done to help identify possible off-site sources.

### COMMENT 1

Sect. 1.1, 1<sup>st</sup> and 2<sup>nd</sup> Sent., Pg. 1

Remove the word potentially from these sentences. Groundwater is being impacted by VOCs at both housing areas.

### COMMENT 2

Sect. 1.6, 2<sup>nd</sup> Sent., Pg. 1-7

The sentence states that the work will begin in "late early January." Please use *early*, *late* or provide a date.

### COMMENT 3

Sect. 2.1, Par. 2, 1<sup>st</sup> Sent., Pg. 2-1

OPHA was not part of the original NAS Sunnyvale. Housing was not built there until about World War II (early 1940's). The land was formerly farmland. A farm continued to exist on the site even after the original World War II housing was built. The farm was removed when the

## **ATTACHMENT 1**

housing area was expanded. Note that the last sentence of Par. 3 states that the housing construction began in 1942, not 1933 as stated here. Please correct.

### **COMMENT 4**

Sect. 2.3.1, 1<sup>st</sup> Bullet, Pg. 2-4

Figures 2-2 and 2-5 do not show tank locations as stated in this bullet.

### **COMMENT 5**

Sect. 2.3.3, 4<sup>th</sup> Sent., Pg. 2-6

This statement should be changed with additional text to read: “The agreement stated the areas *of the regional plume* that each party would be responsible for remediating.”

### **COMMENT 6**

Sect. 5.2.2, Pg. 5-2

Any additional drilling done in the Phase 2 portion of the work plan should also be logged for lithology.

### **COMMENT 7**

Sect. 5.4, Pg. 5-3

In addition to the properties listed for analysis, soil samples from the saturated zone should be collected and analyzed for hydraulic conductivity and grain size distribution. Vadose zone soils should also be analyzed for grain size distribution.

### **COMMENT 8**

Figure 2-2

The figure as presented is somewhat misleading in that it appears that the MEW companies are responsible for most of the Moffett Field clean up. The figure should note that the carve out of responsibilities refers to the regional plume and not other sources of contamination such as USTs. The figure should also have a statement noting the Navy area of responsibility and that the Navy hasn't signed the agreement. The reference for the plume boundary should be provided.