



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

April 25, 2003

Ms. Andrea Espinoza  
BRAC Environmental Coordinator  
Southwest Division  
Naval Facilities Engineering Command  
BRAC Operation Office  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101-0961

**RE: EPA Comments – Draft Record of Decision, Site 25, Eastern Diked Masch, Former  
Moffett Federal Airfield, Mountain View, California, February 21,  
2003**

Dear Ms. Espinoza:

The U.S. Environmental Protection Agency (EPA) reviewed the Draft Record of Decision (ROD), for Site 25, Eastern Diked Marsh dated February 21, 2003. This letter transmits our comments on the report.

**General Comments:**

- 1) The entire Site 25 -Storm Water Retention Pond is about 230 acres. The site has since been divided into three portions: a 50-acre portion owned by Midpeninsula Regional Open Space District (MROSD), the remaining 180 acres owned by NASA has been further divided into a 160-acre portion for further evaluation of tidal wetland restoration and a 20-acre Eastern Diked Mash(EDM) portion for remediation to the seasonal wetland standards. This ROD addresses the 20-acre EDM portion of Site 25. While EPA recognizes that most of the contamination at Site 25 is located within the EDM area and remediation of the area should proceed this summer as proposed in the ROD, the Navy also needs to address the contamination in the remaining two portions of Site 25. Since MROSD intends to restore its 50-acre portion of Site 25 to tidal wetland habitat in the future, the Navy needs to develop a remediation schedule for the area. As for the 160-acre NASA owned portion of Site 25, the agency made a public announcement in January 2003 with its intent to evaluate the compatibility of future tidal wetland restoration in the area and its continued use as a storm water retention pond. EPA considers tidal wetland as a possible future land use for the 160-acre portion of Site 25. Therefore in this portion of Site 25 should be remediated for tidal wetland habitat. Because both NASA and the Navy are responsible for the contamination in Site 25, the two agencies need to work together in developing a remediation schedule for the 160-acre portion of Site 25.

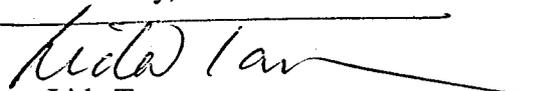
## Specific Comments

1. Declaration Statement, Description of the Selected Remedy, Page i: Please include the Remedial Action Objectives in the Declaration Statement.
2. Section 1.5, Site Type and Section 1.6 Site Description, Page 1-2: Please add “seasonal” prior to the phrase “wetland system” and “wetland habitat”.
3. Section 1.6, Site Description, Page 1-2: Please define total DDT in the section and use the consistent description for total DDT throughout the ROD. There seems to be different descriptions of total DDT in Section 5.7.2 and Section 7.2.2 either as a mixture of the chemical forms of DDT and several breakdown products (Section 5.7.2) or the metabolites of DDT (Section 7.2.2).
4. Section 2.0, Site History and Enforcement Activities, Page 2-1: The ROD should describe the Navy’s plan to divert West-Side Aquifers Treatment System Effluent away from Site 25 because the protectiveness of the selected remedy is contingent upon EDM drying on a seasonal basis.
5. Section 3.0, Highlights of Community Participation, Second Bullet, Page 3-2: As stated in our general comment, EPA does not agree that remediation in the 160-acre portion of the storm water retention pond should be postponed till NASA establishes the site use for the area. Please revise the bullet item to reflect that the Navy will work with NASA to develop a remediation plan for the 160-acre portion of the storm water retention pond.
6. Section 5.3, Surface Water, Page 5-3, Section 6.0, Current and Future Land and Resource Use, Page 6-1: Please revise the statement to reflect that the current ownership of the former Cargil saltwater ponds is the United States Fish and Wildlife Service.
7. Section 5.7, Nature and Extent of Contamination, Page 5-4, and Section 5.7.3, Suspected Sources, Page 5-6: The discussion on the contamination of metals and pesticides in the EDM should be revised to state that Site 25 receives runoff from 1 square mile of a predominantly paved industrial area, of which approximately 50 percent is the NASA Ames Research Center and 50 percent is former Navy property.
8. Section 7.1.3.1, Surface Water, Page 7-2: Please revise the first sentence in the second paragraph if it meant to say that HQ and HI for PCB in the surface water is greater than 1. Also, please delete one of the last two sentences in the paragraph as they are redundant.
9. Section 7.2.4, Allowable Exposure Levels Based on Risk Assessments, Page 7-5: Please either define HQ<sub>4</sub> or delete the acronym.
10. Section 7.3.3, Summary of Cleanup Levels, Page 7-7: Please revise the section and reference documentation which supports the proposed RAO for zinc of 195 mg/kg. Based on Table 2-1 in the Site 25 Draft Pre-Construction Sampling Results Report, the leachability result from a zinc concentration of 195 mg/kg in sediment sample PCSC-25 was 1.09 mg/L, which exceeds the AWQC for zinc of 0.081 mg/L.

11. Section 8.0, Remedial Action Objective, Page 8-1: Please revise the statement that the assumption that the presence of piscivorous birds is insignificant to read: "the assumption that piscivorous birds do not feed on fish at Site 25."
12. Section 9.2, Alternative 2: Excavation with Off-site Disposal, Page 9-3, and Section 12.4, Expected Outcomes of Selected Remedy, Page 12-4: Please change "United States Department of Fish and Game" to the correct agency which made the wetland designation.

Thank you for the opportunity to review the Draft Site 25-Eastern Dike Marsh. EPA will be happy to meet and further discuss our comments. If you have any questions, please feel free to call me at (415) 972-3018, or contact me by email at tan.lida@epa.gov.

Sincerely,



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cc:

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