

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



Reply to Attn of:

QE:218-1

29 APR 2003

Lawrence Lansdale
BRAC Environmental Coordinator
BRAC Operations Office
NAVFACENGCOM Southwest
1230 Columbia St., Suite 1100
San Diego, CA 92102-8517

Dear Mr. Lansdale:

NASA has received the Navy's Draft Record of Decision, Site 25, Eastern Diked Marsh, Moffett Field, CA, dated February 21, 2003. NASA has reviewed the Record of Decision and our comments are provided as an enclosure to this letter. An advance copy of the comments have been provided you by e-mail.

If you have any questions, you can contact me at 650-604-0237 or by e-mail at Donald.M.Chuck@nasa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Donald M. Chuck".

Donald M. Chuck
Manager, Restoration and Subsurface
Office of Environmental Services

Enclosure

cc: Scott Gromko, SWDIV
Andrea Espinoza, SWDIV
Alana Lee, USEPA
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218-1/S. Olliges, M. McGowan,
File, Chron

DESIGN AND DOCUMENT REVIEW COMMENTS

POINT OF CONTACT	PHONE NUMBER	DATE
Don Chuck	650-640-327	4/16/2003
	Project/Document Title Draft RECORD OF DECISION Site 25, Eastern Diked Marsh Moffett Field, CA NAVFACENGCOM Southwest February 2003	

GENERAL COMMENTS

The Navy needs to include an interim removal action at the Stormwater Retention Pond (SWRP) to prevent ongoing exposure of ecological receptors. Although NASA plans to evaluate the feasibility of tidal restoration in the SWRP, this process will take a number of years. The removal action by the Navy is needed to reduce the risk to the ecological receptors to an acceptable level. This should be addressed in a follow-on interim removal action.

Navy needs to divert the West Side Aquifers Treatment System (WATS) discharge to Stevens Creek, upstream of NASA's stormwater sediment settling basin. Allowing WATS to flow through the settling basin undermines the effectiveness of the settling basin, which was designed to remove sediment during storm events, not for the continual inflow from WATS. Also, the continual WATS discharge to the Eastern Diked Marsh (EDM) and SWRP is creating a permanent aquatic environment rather than a seasonal marsh environment whose inhabitants this remedy is designed to protect. For the selected remedy to be effective, the WATS discharge must be diverted upstream of the NASA stormwater settling basin.

COMMENT 1

Site Name and Location, Pg. i

The site and location needs to be changed to read:

Site 25, Eastern Diked Marsh and Stormwater Retention Pond
 [former Naval Air Station, Moffett Field]
 NASA Ames Research Center
 Moffett Field, CA 94035

Remove all references to Moffett Federal Airfield from the text of the document.

COMMENT 2

Statement of Basis and Purpose, Pg. i

In the first sentence, remove *MFA* and replace it with *former NASMF*. In the third sentence, replace *basin* with *pond*. Finally, this ROD does not address the SWRP, which will be addressed in a separate, follow-on document.

COMMENT 3

Description of the Selected Remedy, Par. 2, Bullet 4, Pg. ii

In the first sentence, add an *s* to continue. The sentence should read "Eastern Diked Marsh continues." To insure that the institutional controls will be effective, the WATS discharge will need to be diverted to Stevens Creek at a point upgradient of the settling basing.

COMMENT 4

Table of Contents, Appendix A, Pg. vi

Change "former Moffett Federal Airfield" to former "Naval Air Station Moffett Field (NASMF)."

COMMENT 5

Abbreviations and Acronyms

Remove MFA, Moffett Federal Airfield. Add:
NASMF – Naval Air Station Moffett Field
SWRP – Stormwater Retention Pond
USFWS – US Fish and Wildlife Service

COMMENT 6

Sect. 1.1, Pg. 1-1

As stated in Comment 1, remove all references to Moffett Federal Airfield (MFA) and replace with Naval Air Station Moffett Field (NASMF). The Superfund work is associated with NASMF and not MFA. As requested in Comment 1, this comment applies to all other mentions of MFA within this document and on all figures.

Change "Stormwater Retention **Basin**" to "Stormwater Retention **Pond**" in this section and in all other instances in this document and on the figures.

In the 2nd sentence, change "Cargil Saltwater Evaporation Ponds" to "US Fish and Wildlife Service (USFWS) Diked Ponds." The evaporation ponds north of Ames Research Center (ARC) now belong to USFWS.

COMMENT 7

Sect. 1.6, Pg. 1-2

In the 1st sentence, change MFA to NASA Ames Research Center. Add to this paragraph: "The WATS effluent will be diverted to Stevens Creek upstream from the settling basin prior to or as part of this remedy."

COMMENT 8

Sect. 2.0, Par. 4, Last Sent., Pg. 2-2

Change "Basin" to "Pond" at the end of the sentence. Add to this paragraph: "The WATS effluent will be diverted to Stevens Creek upstream from the settling basin prior to or as part of this remedy."

COMMENT 9

Sect. 3.0, Par. 2, 5th Sent., Pg. 3-1

The sentence needs to be changed by adding the italicized text so that the sentence reads: "... believed *by the Navy* under NASA jurisdiction ..."

COMMENT 10

Sect. 3.0, Par. 3, 1st Sent., Pg. 3-1

The sentence as presently is a run-on sentence. The first sentence should be ended after the zip code 94041. The rest should be set up as a new sentence. In other words, the text should read: "The RI report, ... Mountain View, California, 94041. The index ..."

COMMENT 11

Sect. 3.0, Par. 3, 4th Sent., Pg. 3-1

Change the sentence to read: "The first Proposed Plan was withdrawn ... of the Stormwater Retention Basin *Pond*, believed *by the Navy* to be under ..."

COMMENT 12

Sect. 3.0, Par. 4, 1st Sent., Pg. 3-2

Change the sentence to read: "In response to a public comment, *and as a result of the transfer of the former Cargil salt ponds to the USFWS*, NASA announced their intent to ..." NASA responded to more than one public comment concerning the restoration of the SWRP to tidal marsh.

COMMENT 13

Sect. 3.0, Par. 4, 2nd Bullet, Pg. 3-2

NASA does not agree to postponement of the cleanup of the SWRP. NASA feels that the Navy should conduct a removal action at the SWRP to protect ecological receptors while the tidal marsh restoration is studied and planned. The bullet needs to be changed to state that a removal action will be carried out in the SWRP.

Changing the second bullet to a removal action would necessitate changing the last sentence of the paragraph: "This action will allow ... Eastern Diked Marsh, **and will provide interim protection for ecological receptors in the SWRP**, while site ... Site 25."

COMMENT 14

Sect. 4.0, Par. 1, List, Pg. 4-1

It should be noted that Sites 25 and 27 were covered by OU6. In addition to the sites listed here, Orion Park should be added as it has recently been identified as a contaminated site.

COMMENT 15

Sect. 5.2, Par. 1, 6th Sent., Pg. 5-1.

The B-1 zone was renamed the A-2 zone only for north of Hwy. 101. The MEW parties still designate the B-1 for south of Hwy. 101. This information needs to be added to this sentence.

COMMENT 16

Sect. 5.3, Par. 1, 4th and 5th Sent., Pg. 5-3

The tense of the sentences need to be changed to indicate that Cargil no longer owns to ponds and that they have been transferred to the USFWS. The text should read: "...50 years ago and ~~is now~~ was used for commercial saltwater evaporation ponds. The **former** owner of the pond, the Cargil Corporation, ~~has is currently negotiating a~~ **transferred** the land to the State of California Unites States Fish and Wildlife Service."

COMMENT 17

Sect. 5.4, 1st Sent., Pg. 5-3

Change MFA to NASA Ames Research Center.

COMMENT 18

Figure 5-1

Change *Navarro Farms* to **Former Navarro Farms**. Change *Cargil Salt Pond* to *USFWS Pond*. Change *Stormwater Retention Basin* to *Stormwater Retention Pond*. Change *Former Moffett Federal Airfield* to *Former Naval Air Station Moffett Field*. Add **former** to Lindbergh Avenue Storm Drain Channel. Finally, the water body on the east side of the airfield that is colored dark blue designating a brackish pond is not a pond but a brine transfer canal carrying brine water from the USFWS pond north of the SWRP to the pond just north of the Northern Channel.

COMMENT 19

Sect. 5.5, Par. 2, 2nd Sent., Pg. 5-4.

The sentence states that the EDM is a brackish marsh. However, Figure 5-1 lists the EDM as "freshwater seasonal wetlands." The Navy needs to be consistent with its designations.

COMMENT 20

Sect. 5.7, Par. 1, Last sent., Pg. 5-4

In addition to transformer operations, PCBs have come from Hangar 1 building materials.

COMMENT 21

Sect. 5.7.1, Par. 2, Pg. 5-5

Add *Navy* between the words *during* and *pre-construction* in this sentence.

COMMENT 22

Sect. 5.7.3, Par. 1, 1st Sent., Pg. 5-6

In addition to releases of PCB-containing oil from transformers, PCBs may have also come from oil-filled capacitors and switches, the building materials used to construct and coat Hangar 1, and from paints and other PCB-containing products used by the Navy.

COMMENT 23

Sect. 5.7.3, Par. 1, 5th Sent., Pg. 5-6

In addition to "oil in transformers" in the parentheses, add "Hangar 1 materials." At the end of the sentence add: "or are planned for encapsulation or removal, respectively." The following sentence should be changed to read: "**These** actions, along ..."

COMMENT 24

Sect. 6.0, Par. 3, 5th and 6th Sent., Pg. 6-1

The following changes to these sentences need to be made. "The tidal salt marsh and mud flats north and northeast of MFA **the former NASMF** were diked more than 50 years ago and ~~are now~~ **were formerly** used for commercial saltwater evaporation ponds. The Cargil Corporation, the ~~current~~ **former** owner of the ponds, ~~is currently~~ negotiating a **transferred** of the land to the State of California **United States** Fish and Wildlife Service."

COMMENT 25

Sect. 7.1.3.1, Par. 2, 1st Sent., Pg. 7-2

This sentence as written does not make sense. It states that PCBs are the only organic compounds detected in surface water. This contradicts the last sentence of the previous paragraph which states that TPH, which

is also an organic compound, was found in the surface water. HQs and HIs will not indicate whether a specific compound is organic or not.

COMMENT 26

Sect. 7.1.3.1, Par. 2, Last two Sent., Pg. 7-3

These two sentences are repeats. Eliminate one of the sentences.

COMMENT 27

Sect. 7.2, Par. 1, 1st Sent., Pg. 7-4

Delete the comma after the word *part*.

COMMENT 28

Sect. 7.2.2, Par. 1, 2nd Sent., Pg. 7-4

The word *as* should be added between the words **SWEA** and *potentially*.

COMMENT 29

Sect. 9.0, Par. 1, Pg. 9-1

Instead of stating that the SWRP will be the subject of future study to support tidal marsh restoration, the paragraph should state that the Navy will undertake a separate interim removal action at the SWRP to protect the ecological receptors while the tidal restoration studies are ongoing.

COMMENT 30

Sect. 9.2, 2nd Sent., Pg. 9-2

The sentence should be edited to read: "... Eastern Diked Marsh continues to be used for stormwater management, ..."

COMMENT 31

Sect. 9.2, "Land use, water use, other impacts:," Last Sent., Pg. 9-3

The wetlands designation for the site was made by the U.S. Army Corps of Engineers, not the agency mentioned. As far as is known, there is no agency called the United States Department of Fish and Game. The California Department of Fish and Game (CDFG) is probably being confused with the United States Fish and Wildlife Service (USFWS).

COMMENT 32

Sect. 9.2.1, Par. 3, Last Sent., Pg. 9-4

Add the word *properly* between the words *and* and *disposed*.

COMMENT 33

Sect. 9.2.4, Par. 1, 2nd Sent., Pg. 9-4

The diversion of the WATS effluent to Stevens Creek upstream of the settling basin should be accomplished prior to, or as part of, the remedial action. Diversion of WATS is required to allow the settling basin to operate correctly. Also, if WATS continues to flow to the SWRP, the

seasonal nature of the pond will be changed so that seasonal drying will not occur, allowing for fish to take up residence in the pond causing the attraction of piscivorous birds.

COMMENT 34

Sect. 9.3, "Land use, water use, other impacts:," Last Sent., Pg. 9-6

The designation of the site as wetlands was from the U.S. Army Corps of Engineers. See Comment 31.

COMMENT 35

Sect. 10.2, Par. 2, 4th Sent., Pg. 10-3

After the words *unrestricted use* add "*in residential areas.*"

COMMENT 36

Sect. 10.3, 2nd Sent., Pg. 10-3

In order to maintain the proper settling basin operation and insure seasonal drying, the WATS discharge must be diverted upstream of the settling basin to Stevens Creek.

COMMENT 37

Sect. 10.9, Par. 1, 1st Sent., Pg. 10-5

Delete the comma after May 2.

COMMENT 38

Sect. 10.9, 4th Par., Pg. 10-6

Change the 1st sentence to read: "In response to a public comment *and the transfer of the former Cargil salt ponds to USFWS*, NASA announced ..." In the second bullet, the Navy should conduct an interim removal action in the SWRP to protect ecological receptors while the studies concerning tidal restoration are studied instead of postponement of the cleanup in the SWRP.

COMMENT 39

Sect. 12.2, Par. 2, 5th Bullet, Pg. 12-2

Part of the institutional controls to maintain the seasonal drying must include the diversion of WATS effluent to discharge to Stevens Creek upstream of the settling basin.

COMMENT 40

Sect. 12.2, Par. 3, 1st Sent., Pg. 12-2

The word *was* is doubled ("It *was* also *was* agreed ..."). Remove one of them.

COMMENT 41

Sect. 12.4, Par. 3, Last Sent., Pg. 12-4

Change "United States DFG" to "United States Army Corps of Engineers."