



# California Regional Water Quality Control Board

## San Francisco Bay Region



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Secretary for  
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Date: APR 25 2003  
File No. 2189.8009 (AVC)

✓ Mr. Lawrence Lansdale  
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Mr. Scott Gromko  
Remedial Project Manager  
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**Subject: Comments on Draft Record of Decision, February 21, 2003, Site 25, Eastern Diked Marsh, Former Moffett Federal Airfield, Moffett Field, California**

Dear Mr. Lansdale and Mr. Gromko:

Thank you for the February 21, 2003, Draft Record of Decision, February 21, 2003, Site 25, Eastern Diked Marsh, Former Moffett Federal Airfield (MFA), Moffett Field, California received by San Francisco Bay Regional Water Quality Control Board (Regional Board) on February 24, 2003. This document presents the selected remedy for the contaminated sediments from the Eastern Diked Marsh portion of Site 25 at MFA.

Regional Board staff has thoroughly reviewed the above document, and general and specific comments are presented below:

### General Comment

1. Please modify the title of the document from Site 25, Eastern Diked Marsh (EDM) to "Eastern Diked Marsh Portion of Site 25", as used on page i of the document, to reflect the site configuration. Starting the site name with "Site 25,..." could be confusing and misleading because of the previous use of this name in other documents for the area identified as Eastern Diked Marsh, Storm Water Retention Basin and Mid-Peninsula Open Space District (MOSD) portion of the site former MFA.

### Specific Comments

Regional Board' staff specific comments are presented in the following table:

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at <http://www.swrcb.ca.gov>.

Comment No.	Regional Board Comment
1. Declaration Statement	Description of the Selected Remedy, Page ii: This section does not include the following components as outlined in the Guidance: A description of how the action fits into the overall site management plan (given that the action is one of several operable units), the intended sequence and timing of the operable units, and the identification of the selected performance standards.
2. Declaration Statement	In the certification checklist please include page numbers indicating where the listed information can be found in the ROD to become a "roadmap" to key information, as suggested in the EPA Guidance.
3. Declaration Statement	According to the EPA Guidelines this section should include the formal authorizing signature page for the ROD. Please include this page in the Draft Final document for regulatory review.
4. Section 3.0: Highlights of Community Participation	The text states that NASA announced their intent to conduct further studies as to the compatibility of tidal marsh restoration and continued use of the Stormwater Retention Basin (SRB) as part of the NASA Ames stormwater management system and that the cleanup SRB will be postpone until NASA establishes the site use for the area. According to the Guidance, this section needs to include a description of the time frame to achieve proposed land use, anticipated socio-economic and community revitalization impacts, and anticipated environmental and ecological benefits.
5. Section 6.0: Current and Future Land and Resource Use	Please revise the second part of this section to present the current adjacent/surrounding land uses of the EDM portion of Site 25 at former MFA.
6. Section 7.1.1: Human-Health Risk Assessment	This section indicates that the risks to human health "were found to be less than $1 \times 10^{-4}$ for cancer risk and hazard index (HI) of less than 1" without being very clear which risk scenario was used in considering the reasonably anticipated future land use. Since the ROD is the primary data source for all parties interested in site cleanup, this clarification is required.
7. Section 9.2.4: Institutional Controls	Section 12.2, Page 12-3: According to the Guidance, a description of the institutional control components of the remedy should be expanded upon in this section. Please include a description of the procedures that will be used to report violations or failures of the institutional controls to the appropriate EPA and/or state regulator and the designated party responsible for reporting. Include a description of the legal authority for enforcement procedure(s), such as state statutes, regulations, ordinances, or other legal authority. Also clarify the method(s) that will be used to provide notice of the institutional controls at the site to subsequent owners or lessees.

8. Section 10.2 Compliance with ARARs	Regional Board staff recognize that the inclusion of the San Francisco Bay Basin Plan (Basin Plan) as an ARAR is a difficult issue for the Navy, and are aware the Navy disagrees. We consider that the Basin Plan is and ARAR that establishes water quality objectives, including narrative and numerical standards, that protect the beneficial uses of surface water and wildlife habitat. During construction work, Regional Board staff expect that the relevant provisions of the Basin Plan will be followed.
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If you have any questions, please contact me at (510) 622-2353 or E-mail to [avc@rb2.swrcb.ca.gov](mailto:avc@rb2.swrcb.ca.gov).

Sincerely,



Adriana Constantinescu, RG  
Project Manager

cc: Ms. Lida Tan, USEPA  
Mr. Donald Chuck, NASA  
Mr. Bob Moss, RAB Co-Chair  
Mr. Duncan M. Simmons, MidPeninsula Regional Open Space District

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