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BASE REALIGNMENT AND CLOSURE  
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N00296.001113  
MOFFETT FIELD  
SSIC NO. 5090.3.A.

5090  
Ser BPMOW.DSG\0188  
December 8, 2006

Ms. Yvonne Fong  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne St., (SFD-8-3)  
San Francisco, CA 94105

Mr. Devender Narala, P.E.  
Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Dear Ms. Fong and Mr. Narala:

Enclosed is the *Technical Memorandum Assessing Selenium Concentrations in the Clay Remaining After Excavation of Contaminated Sediments, Site 27, former Naval Station Moffett Field, Santa Clara County, California*. The purpose of this document is to address the detections of selenium, at levels slightly exceeding the cleanup criteria (identified in the *Record of Decision Site 27 – Northern Channel former Naval Air Station Moffett Field, Santa Clara County, California*), in clays underlying the Northern Channel, the Marriage Road Ditch, and the North Patrol Road Ditch following excavation of contaminated sediments. The Navy believes that further excavation of the clays is not necessary and has prepared this Technical Memorandum to provide the rationale for not continuing the excavation process to excavate the clay.

The key points presented in the document are as follows:

- 1) Based on available information, it is likely that the selenium is naturally occurring, and may have become immobilized as a result of metals substitution within the clays.
- 2) Selenium is not associated with current or historical site activities at Moffett Field.
- 3) Additional clay sampling and laboratory analyses for soluble forms of selenium confirmed that the selenium in the clays is present in insoluble/immobile forms, with reduced bioavailability.
- 4) Analysis of the methodology used to calculate the selenium cleanup goal in conjunction with the current selenium data for the clay supports that selenium in clays underlying the excavated sediments would not result in any adverse impact to ecological receptors.

As always, if you have any questions, please do not hesitate to contact me at (619) 532-0952 or [richard.weissenborn@navy.mil](mailto:richard.weissenborn@navy.mil) or Mr. Scott Gromko at (619) 532-0933 or [david.gromko@navy.mil](mailto:david.gromko@navy.mil).

Sincerely,

RICHARD WEISSENBORN  
BRAC Environmental Coordinator  
By direction of the Director

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Encl: **Technical Memorandum for Assessing Selenium Concentration in the Clay Remaining After Excavation of Contaminated Sediments, Site 27, former Naval Station Moffett Field, Santa Clara County, California**

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ENCLOSURE

DRAFT  
TECHNICAL MEMORANDUM  
ASSESSING SELENIUM CONCENTRATIONS IN  
CLAY REMAINING AFTER EXCAVATION OF  
CONTAMINATED SEDIMENTS

DATED 08 DECEMBER 2006

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