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From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: SCHEDULE REVISION FOR FEDERAL FACILITY AGREEMENT FOR NAS
MOFFETT FIELD

Ref: (a) Final revised FFA schedule for NAS, Moffett Field including response to agency
comments

1. Reference (a) was submitted to you during the 1 October 1991 meeting at the California EPA's offices. If you should have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Mr. Stephen Chao, Code 1813SC, (415) 244-2551).

Sincerely,

Original signed by:

Stephen Chao - for

GILBERT RIVERA

Head, Installation Restoration Section

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**FEDERAL FACILITIES AGREEMENT ATTACHMENT 3
PROPOSED MODIFICATIONS**

RESPONSES TO AGENCY COMMENTS

Comments on the proposed modifications to Attachment 3 of the Federal Facilities Agreement (FFA) were received from the U.S. Environmental Protection Agency Region IX (EPA), California Environmental Protection Agency, Department of Toxics Substance Control (CAL EPA), and San Francisco Bay Region Water Quality Control Board (RWQCB). Their comments and the Navy responses are as follows:

EPA Comments

1. For each proposed operable units (OU) a draft remedial investigation report (OU-RI) should be clearly stated; e.g. Draft OU-1 (or Name of OU) Remedial Investigation Report.

Response: The FFA Attachment 3 has been revised to clearly state each OU remedial investigation report.

2. For each proposed OU, the deadline for draft primary documents should be an actual date not elapsed time. Draft primary documents are RI report, Feasibility Report (FR), Proposed Plan (PP), Record of Decision (ROD), and Remedial Design/Remedial Action (RD/RA) schedule. The subsequent deadline submittal date of the draft final and final of the primary documents are per consultation clause.

Response: The FFA Attachment 3 has been revised to include an actual date.

3. Each OU proposed plan should be submitted to the regulatory agencies with the FS. The proposed plan is essentially the recommendation or conclusion of the FS and should be reviewed as one package. Also, the FS and PP is a major milestone submittal and will be reviewed by the superfund, RCRA, water and air programs as well as the office of regional counsel.

Response: The FFA Attachment 3 has been revised to have the proposed plan submitted concurrent with the feasibility study.

4. The Initial Screening of Remedial Technologies document need not be finalized as a separate document. Regulatory agency comments should be incorporated into the subsequent draft primary FS document and finalized as part of the FS document.

Response: Agency comments on the Draft Initial Screening of Technologies Report will be incorporated into the draft feasibility study.

5. Both OU-2 and OU-4 RI report have the same submittal date of April 1, 1992. For administrative purposes, each draft primary document(s) should be combined into one submittal. Since a number of sites are involved, each site or cluster of sites may be addressed as a chapter in the primary documents.

Response: OU-2 (soils at 15 sites) and OU-4 (Westside Groundwater) are substantially different. Each of the OU RI reports will be a large, multi-volume document.

Although technical and format consistency will be maintained between the two reports, they will be "stand-alone" documents. This separation also facilitates concurrent production of the two documents because it breaks the reporting into manageable documents and, therefore, allows some independence of the document production staff. Finally, separation of the documents facilitates independent review, use, and follow-up to each of these RI reports.

6. Both OU-3 and OU-5 RI report have the same submittal date of April 1, 1993 and should be combined into one document. Same rationale as OU-2 and OU-4.

Response: As in the previous response, OU-3 (Sites 12 and 15 soils) and OU-5 (Eastside Groundwater) are substantially different. The Navy believes that it is appropriate and necessary to keep these OU RI reports separate.

CAL EPA Comments

7. All Draft Primary Documents must have specific deadline dates.

Response: See response to Comment 2.

8. Draft Proposed plan, draft Feasibility Study and draft RD/RA require to be submitted concurrently.

Response: The FFA Attachment 3 has been revised to have the draft proposed plan, draft feasibility study, and draft RD/RA schedule submitted concurrently.

9. Draft RI and draft Initial Screening Remedial Technologies are to be submitted concurrently.

Response: The Draft RI and Draft Initial Screening Remedial of Technologies documents will all be submitted concurrently except for OU-4. Because of the schedule for the OU-4 FS, it is necessary to submit the OU-4 Initial Screening of Remedial Technologies document earlier than the Draft RI.

10. OU-5 requires a deadline date for draft Proposed Plan.

Response: The FFA Attachment 3 has been revised and a date has been provided.

RWOCB Comments

11. We concur with the basic proposal to divide the base into operable units with a separate RI/FS for each unit.

No response required for comment.

12. The time schedule within each operable unit, from the draft RI to the final FS appear reasonable and consistent with our experience at other South Bay cleanup sites.

No response required for comment.

13. For operable units 3 and 5 it is unclear why the draft RI will not be submitted until April of 1993. A technical justification of the time required to complete RI investigations between now and April 1993 is needed before we can agree to these dates.

Response: The time required for preparation of the draft RI Reports for OUs 3 and 5 is consistent with the schedule for the other OU draft RI Reports. In all cases, 210 days are planned for preparation of the draft RI reports. This time period includes data treatment, internal draft report preparation by Navy contractors, Navy review and comment on the internal draft report, revision of the internal draft report by the Navy contractors, and submission of the draft report to the regulatory agencies. The 210-day period begins upon completion of data validation and entry.