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MOFFETT FIELD
SSIC NO. 5090.3.A

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

March 14, 2006

Mr. Rick Weissenborn
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 on the Draft Final Addendum to the Final Station-Wide Feasibility Study – Site 25, Former Moffett Federal Airfield, California, dated December 12, 2005

Dear Mr. Weissenborn:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Final Addendum to the Final Station-Wide Feasibility Study – Site 25, Former Moffett Federal Airfield, dated December 12, 2005. We provide the following comments:

General Comments:

1. Recommended Remediation Footprint: The report proposes using the tidal marsh scenario to establish the footprint for remediation. While EPA concurs with the proposed remediation goals established for the tidal march scenario, the remedial footprint for this scenario would result in a less protective cleanup given that the total remediation area is smaller than under the managed pond scenario. The report needs to explain why the tidal marsh scenario results in less acreage being removed as compared to the managed pond scenario. Unless the final remediation footprint encompasses the most conservative areas, institutional control measures will be necessary to provide additional protection for areas unsuitable for future potential tidal marsh development.

2. The report should include two large scale figures which would show the two alternatives (tidal marsh and managed pond) with all the sample data and the polygons proposed to be removed. These figures are very important visual aids for future public presentations on Site 25 cleanup. Also, it is difficult for the agencies to determine whether the proposed remedial alternative would remove the most contaminated polygons without this information.

Specific Comments:

1. Figure 2: This figure should identify NASA's upland peninsula area in order to support the discussions in the text about remediation of the area.

2. Figure 6: Total PCB Concentrations at Site 25: While Figures 3 through 5 have been revised to correlate the COC concentrations with their respective remediation goals, Figure 6 still has total PCB concentrations that don't seem to be correlated with the PCB remediation goals. Please revise.

3. Section 1.0 Introduction: The last sentence in the section is incomplete, please revise.

4. Section 1.3.2 Habitat Present under the Tidal Marsh Scenario: This section should revised to describe the tidal marsh habitat and the complete range of receptors expected to inhabit the area. Rather than focusing on special-status receptors alone, please describe the plants and animals found here and then the receptors and why they were selected to represent the trophic levels. The last sentence in this section seems to imply that the mallard, black-necked stilt and great blue heron are represented in the insets to the right. But only the great blue heron appears. Please clarify. Also, the last sentence on page 7 refers to Insets 3, 4, and 5, though only Inset 4 depicts something mentioned in the sentence. Please revise.

5. Section 1.4, Nature and Extent of Contamination: Although the vertical extent of the contamination of lead, zinc, total DDT and total PCB can be found in referenced documents, the report should include a brief summary of this information in Section 1.4. Also, please explain why water is not considered a medium of interest.

6. Section 2.1.4. Application of Sediment Remediation Goals: Please add the following sentence: "Under the managed pond scenario, the seasonal habitat remediation goal would be applied to the Eastern Diked Marsh" after the fourth sentence in the last paragraph of this section.

7. Section 4.2.3 and 4.2.4, Alternatives 3 and 4: In EPA's General Comment #5 on the draft report dated September 7, 2005, we commented on the cost-effectiveness, necessity, and implementability of *in situ* treatment in areas other than the Eastern Diked Marsh. This draft final report has not fully addressed the comment. Please provide further explanation on the rationale of *in situ* mixing in the areas of Site 25 outside of the Eastern Diked Marsh. Specifically, please address the issues of cost-effectiveness and implementability. Please expand the rationale behind the statement: "lead concentrations greater than 50 milligrams per kilogram could result in the sediments needing to be disposed of as hazardous waste under the Resource Conservation and Recovery Act" (Section 4.2.3, pg. 77). 40CFR261.24 identifies soil as a hazardous waste if the toxicity characteristic leaching potential of lead is greater than 5.0 mg/L.

8. Table D-1, ARARs:

a. Please provide the rationale why the California Toxics Rule is not considered an ARAR for site 25. Also, please add 40CFR131 to the list of ARARs, or provide an explanation as to why it should not be included.

b. Please provide rationale as to why the requirement for verification procedures for PCB cleanup verification in 40 CFR 761.61(a)(6) is not an ARAR for Site 25 remediation (EPA Specific Comment 14(b), September 7, 2005).

c. The narrative on 27 CCR §§ 20210, 20220, and 20230 in Table D-1 is very limited, and there is no narrative addressing the specific example provided in EPA's Specific Comments #14(c) (September 7, 2005).

d. Please provide rationale why 40 CFR §§ 761.60(a) or 761.75 are not ARARs for Site 25.

e. The report included discussion of 40 CFR 761.61(a)(4)(vi) in Table D-3 but it did not include discussion of other requirements of 40 CFR 761.61 that it also identified as ARARs, e.g. 40 CFR 761.61(a)(4)(i). Please revise to include the discussion.

f. Please provide rationale as to why 40 CFR 761.61(a)(8) is not considered an ARAR.

g. While the report listed a range of sections from BAAQMD Regulation 8, Rule 40 that apply to the remedial action but and states that only the substantive provisions apply. The report should specifically identify the applicable substantive provisions in these sections.

h. The report still needs to explain the methodology that will be employed to identify the substantive provisions of the Endangered Species Act and the California State Fish and Game Code.

i. The report states that the Navy will consult with the United States Department of Fish and Wildlife Services "on an informal basis", please clarify how this consultation will be documented or communicated to the stakeholders. Also, the Navy has not addressed the portion of the comment referencing the California State Fish and Game Code as an ARAR Please expand the FS Addendum to explain the consultations that the Navy will undertake and propose a mechanism for informing stakeholders of the status of these consultations.

If you have any questions, please contact the new EPA Remedial Project Manager, Ms. Yvonne Fong at (415) 947-4117, or by email at YvonneW.Fong@epa.gov.

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Sincerely,

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