

**Response to Comments Submitted by Judith Parker (DTSC)
on the Operable Unit 1 Draft RI Report for
NAS Moffett Field, California**

General Comments:

1. Noted
2. Noted and agreed.
3. A specific item by item response has been prepared for each comment made by DTSC and the other agencies. This item by item response is submitted along with the revised RI document.
4. The presence of TICs does not indicate a problem with data quality. It does indicate the potential presence of compounds not found in the analytical libraries of standards. The vast majority of TICs are generally long chain hydrocarbons and there can be literally thousands of different compounds (e.g. $C_{10}H_{22}$, $C_{11}H_{24}$, and so on). Water and soils containing high levels of natural organic compounds will have large numbers of TICs because of the many naturally occurring compounds of this type (e.g., the hundreds or thousands of compounds that make up "humic acids"). When a sample is run through a GC, peaks that cannot be identified as known Target Compound List (TCL) chemicals are identified as TICs. The laboratory is sometimes able to assign a tentative identity or chemical class to the peak but this tentative identification is highly uncertain. The concentration of the TIC may also be estimated; however these estimates are highly uncertain and could be orders of magnitude too high or too low. The assigned identities of TICs are therefore likely to be inaccurate and the quantitation is certainly inaccurate. Because of the extremely large uncertainty involved, TIC information is often not even provided with data summaries from the laboratory. Therefore, both federal and Region IX EPA guidance recommends excluding TICs from the baseline risk assessment unless there is reason to believe the site would have a large number of non-TCL compounds (e.g., a chemical manufacturing site with many unusual product intermediates).
5. Sediments have been included with surface soil. This has been clarified in the text.
6. All of the soil ingested while at the site is assumed to be from the site. However, the worker is assumed to return home and ingest some soil there. Two default values have been provided by the U.S. EPA for ingestion of soil by workers: 50 mg/day for general workers (one half of the 100 mg/day value) and 480 mg/day for workers engaged in earthmoving activities (i.e. farmers, construction workers). While occasional short-term construction may occur at these sites (e.g. installation of a monitoring well), continuous earthmoving activities, all day, every working day for a 25-year career, are not anticipated at these sites; therefore, the lower value has been chosen.

7. All PCBs have been evaluated using the toxicity values for Aroclor-1260. This has been clarified in the text.
8. The discussion of a lead RfD has been removed from the report. Lead is not present in any of the media carried through the quantitative risk assessment.
9. The recreational user is assumed to be directly on site while the residential receptor is adjacent to the site; therefore, the potential recreational risks are higher.

Specific Comments:

1. The "New" Golf Course Landfill identified by the additional Sites Investigation Report is a separate area from the OU1 Golf Course Landfill. A work plan for further investigation of the three additional sites is planned and a separate RI/FS process is planned for these three sites. Further the conclusion should have stated that "any risk will be evaluated in the base-wide FS." The paragraph has been revised to note this.
2. Chapter 4 is a discussion of the nature and extent of contamination of Site 1 and as such the possible routes of contamination are in respect to the environment. Potential routes of contaminant migration for human receptors is addressed in Chapter 7 of this report.
3. Essential nutrients were not reviewed/discussed in nature and extent of contamination chapters for Sites 1 and 2. However, they were not eliminated a priori from the risk assessment, and their potential toxicity is described in Appendix F of the OU1 RI Report.
4. This chapter provides a discussion of some of the processes that influence contaminant fate and transport in the environment. The movement of contaminants in dust particles is a potential route of transport, but is not considered significant to these sites and is not included in the discussion.
5. Degradation processes are considered in this discussion only as they apply to fate and transport mechanisms and the explanation of that process. Detected concentrations are not adjusted, and actual detections are used in the risk evaluation.
6. The rationale presented is not consistent and the statement regarding volatilization during the dry season (summer) has been deleted.
7. The third paragraph on page 6-4 has been revised to note that acetone "was" detected at Site 1. The text has been revised on page 6-6 to note that carbon disulfide was detected in the sediment samples. The statement that indicates that carbon disulfide contamination is only in fill material has been deleted.
8. The statement on page 6-8 that methylene chloride is a by-product of the biotransformation of PCE and TCE has been deleted.

9. Chapter 6 and the discussion contained therein are on contaminant fate and transport and are not intended to provide or meet risk assessment criteria. The baseline risk assessment for this OU is presented in Chapter 7 and RAGs is followed. It should be noted that benzoic acid is identified as a COPC for the leachate at Site 1.