



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

March 2, 1993

Stephen Chao
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Bldg. 101
San Bruno, CA 94066-0720

Dear Mr. Chao:

The U.S. Environmental Protection Agency (EPA) has reviewed the Navy's response to EPA comments on the Draft Final Baseline Risk Assessment for Operable Unit 2 at NAS Moffett Field. Our remaining comments on this document are enclosed. These comments should be addressed in the Final OU 2 Remedial Investigation (RI) Report. I propose to extend the informal dispute period until our review of your response to our remaining comments is completed. Please let me know if you have any problems with this.

Please call me if you have any questions responding to our comments. I can be reached at (415) 744-2385.

Sincerely,

A handwritten signature in cursive script that reads "Roberta Blank".

Roberta Blank
Remedial Project Manager

Enclosure (1 page)

cc: Elizabeth Adams, RWQCB
Cyrus Shabahari, DTSC

U.S. EPA Remaining Comments on the Navy's
Draft Final OU 2 Baseline Risk Assessment

1. Page 20-48 and Table 20.3-10A: Chemical Specific Dermal Absorption Factor for Soils. Citing the Mckone and Wester et al. paper rather than presenting the rationale which was used to derive these numbers is not acceptable, since no EPA approved values exist for these factors. Please provide the rationale.

2. Section 20.6. Although it is referred to, the risk at background presented in the July 1992 Draft Baseline Risk Assessment is not included in the current version of the report. Calculation of the risk at background is essential to the baseline risk assessment due to the uncertainties associated with background levels. Additionally, the rationale for selection of background concentrations used in the risk assessment must be presented.

3. Appendix A is the source of the chemical concentration data used in the Baseline Risk Assessment. According to the Draft Final RI, changes have been made to Appendix A and, therefore, this material should be reviewed to ascertain what, if any, effect these data changes would have on the risk assessment.

4. Site 19 includes contamination from Tank 53. Data collected as a part of the "Draft Additional Tank and Sump Field Investigations Technical Memorandum," dated December 22, 1992, by PRC Environmental should be included in the Baseline Risk Assessment. Data from soil samples in that report included benzene, toluene, ethylbenzene, and xylenes (BTEXs) in significant quantities. Approximately 20 soil samples near Tank 53 had benzene concentrations above the estimated 29 ug/kg modeled as leaching into the groundwater at levels above the maximum contaminant level (MCL) Table 20.3-14.