

**RESPONSE TO COMMENTS ON
NAS MOFFETT FIELD
DRAFT FINAL ADDITIONAL INVESTIGATION OF
INFERRED SOURCES FIELD WORK PLAN
AND
RESPONSE TO REGULATORY AGENCY COMMENTS**

AUGUST 6, 1993

This report presents point-by-point responses to U.S. Navy comments on the internal review versions of (1) the "Draft Final Additional Investigation of Inferred Sources Field Work Plan" and (2) the response to regulatory agency comments on the "Draft Preliminary Assessment/Site Inspection Field Investigation Work Plan" prepared July 30, 1993 by PRC Environmental Management, Inc. (PRC) for Naval Air Station (NAS) Moffett Field, California. Mr. Su Don Tu submitted the comments in a memorandum dated August 4, 1993.

General Comments

Comment Number 1. As pointed out by Ms. Elizabeth Adams of the California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) and Mr. Michael Gill of the U.S. Environmental Protection Agency (EPA) in their general comments on the "Draft Preliminary Assessment/Site Inspection (PA/SI) Field Investigation Work Plan," this work plan is designed to address the Middlefield-Ellis-Whisman (MEW) companies' concerns with potential source areas which may be contributing to the regional plume. However, documentation of the data used to discount half of these sites is not included in the work plan to enable sufficient evaluation of these recommendations. It is suggested that one additional section, besides Table 1 and Plate 1, be added to describe the reasons why they are recommended for no further action. PRC's response to EPA specific comment 4 contains a significant amount of information to adequately address this issue for various buildings. Incorporate this information into the section suggested to be added, if appropriate.

Response:

The inferred source areas discussed in EPA specific comment 4 are the same areas the MEW companies describe as specific areas of concern (HLA 1993). In a letter from Mr. Gilbert Rivera of the U.S. Navy, Western Division (WestDiv) to Ms. Roberta Blank of EPA dated March 9, 1993, the Navy presented the technical rationale indicating why the Navy does not believe these areas are potential sources to the regional plume. In the July 23, 1993 meeting with the regulatory agencies, PRC reiterated the technical position presented in the March 9, 1993 letter. The agency representatives and their consultants agreed to the investigations proposed in the additional investigation of inferred sources field work plan (that is, the transportation yard and Site 8). They also agreed that no further actions were necessary for the other inferred source areas discussed in EPA specific comment 4. The agencies requested that additional data references be added to Table 1 and that well locations be indicated on Plate 1. These modifications have been made in the draft final submittal.

It is possible that other readers of this work plan, the MEW companies in particular, may believe that insufficient data are presented to justify the deletion of many of the buildings of interest. However, the response to regulatory agency comments will be part of the administrative record and will be available for public review. In addition, during the July 23, 1993 meeting, Mr. Gill stated that EPA would send a letter to the MEW companies expressing EPA's satisfaction with the proposed scope of the additional inferred sources field work to provide closure on the inferred source issue at NAS Moffett Field. Therefore, PRC believes that the modifications presented in the draft final submittal (that is, the additions to Table 1 and Plate 1) are sufficient and that additional, more detailed, explanations of the screening of the buildings of interest are unnecessary.

Comment Number 2.

EPA Specific Comment 4, Building 88. According to the attached article, "Anaerobic Degradation of Trichloroethylene in Soil," published in Environmental Science and Technology in 1985, the conversion of

tetrachloroethene (PCE), trichloroethene (TCE), and 1,2-dichloroethene (1,2-DCE) may occur almost exclusively in unsterilized soil. Therefore, microbial participation seems certain. Without microbial participation, the degradation of PCE, TCE, and 1,2-DCE might be limited.

Response:

Because subsurface microbial conditions are difficult to evaluate accurately, the degree of microbial participation in the degradation of PCE and TCE in the Building 88 area would be difficult to assess. Consequently, it is unlikely that the Navy could claim no responsibility for TCE contamination in the vicinity of Building 88 on the basis of a hypothesis that degradation of PCE does not occur in the subsurface because of inadequate microbial activity. However, the hypothesis that only limited PCE degradation occurs may be useful in limiting the Navy's liability in future cost recovery and mass allocation discussions with the MEW companies.

REFERENCES

- Harding Lawson Associates (HLA). 1993. "Summary of Potential Source Areas, NAS Moffett Field, Santa Clara County, California." May 17.
- Rivera, Gilbert, U.S. Navy, WestDiv. 1993. "Technical Evaluation of Inferred Sources at NAS Moffett Field, California." Personal communication to Ms. Roberta Blank, EPA. March 9.