



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

April 7, 1994

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

Re: Draft Operable Unit 5 Proposed Plan, dated February 18, 1994

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and submits the following comments. Call me at 415-744-2383 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Gill".

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

cc: Elizabeth Adams (RWQCB)
C. Joseph Chou (DTSC)
Ken Eichstaedt (URS)
Mike Young (PRC) (Fax)

Comments

Moffett Field Draft OU5 Proposed Plan (dated February 18, 1994)

General Comment

1. As in the Feasibility Study, a no action alternative is not acceptable to EPA because of the following reasons:
 - a) The OU5 aquifers are a potential drinking water source.
 - b) Concentrations of PCE and TCE above MCLs exist in the A1 aquifer (OU5 RI).
 - c) Future land use analysis does not determine aquifer use. Groundwater below an industrial site could potentially be pumped offsite for use. Future land use analysis is important when considering the remediation of soil, not groundwater.
 - d) The Navy's development of RBCs is not necessary and they are incorrect in this case because they don't assume all exposure pathways. PRGs exist and have been distributed to the Navy.
 - e) The number of substantive remedial alternatives were insufficient. By considering other alternatives, the cost of actually remediating may be less than \$8 million.
 - f) The value added by remediating the aquifers is well worth the estimated \$8 million cost. There is not a tremendous amount of difference between this cost and the no-action cost of \$3 million. It would almost certainly be quickly accepted by EPA, the State and the community and allow future use without any deed restrictions. There is a high return on this investment.

Specific Comments

1. p.3 Hydrogeology. A sketch of the aquifer zones at OU5 would be illustrative for the community.
2. p.3. Nature and Extent. Figure 5 from the Draft OU5 FS showing the plumes would help the community visualize the problem at this site. Mention of background with regards to inorganics either needs more clarification or to be left out of this plan.
3. p.4. Summary of Site Risks. Please clarify EPA Region 9's position with regard to risk within the 10^{-4} to 10^{-6} range for carcinogens. Region 9 reserves the right to consider site specific instances when considering remedial alternatives when the risk falls within this range. Acceptable risk is considered less than 10^{-6} .