



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

June 6, 1994

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

Re: Response To Comments on Draft Operable Unit 6  
Remedial Investigation Report, dated May 4, 1994

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the Draft Final OU6 Remedial Investigation (RI) Report and associated response to comments. As specified in the Federal Facility Agreement (FFA), the period between the draft final and the final submittal of a primary document is considered an informal dispute period. If the regulatory agencies have any issues that must be addressed, the document should not be finalized. As agreed upon by all parties, the informal dispute period has been extended. The following general comments are communicated to clarify EPA position, but a response is not necessary. Several specific comments follow the general comments. If the Navy responds satisfactorily to these specific comments, then the document can be finalized. It is anticipated that because of the additional comments, an additional period of time is necessary to finalize the document. The proposed date to finalize the OU6 RI is June 22, 1994. 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: C. Joseph Chou (DTSC)  
Ken Eichstaedt (URS)  
Ron Gervason (RWQCB)  
Mike Young (PRC) (Fax)

**DRAFT FINAL OU6 REMEDIAL INVESTIGATION REPORT, DATED MAY 3, 1994**  
**GENERAL COMMENTS**

1. The Navy has stated that some significant differences exist between EPA Risk Assessment Guidance (RAGS) and the State of California risk assessment guidance (SGRA). Consistency in approach is important when performing risk assessment at different sites. But it should be noted that in the case where differences do arise between state and federal guidance, the Navy should be following whichever guidance provides the most health protection. If this is not the case for OU6, the Navy needs to use the most health protective methods.
2. Many responses to comments indicate that the Navy has strong feelings towards positions taken. Our intent in pointing out various Navy qualifying statements used to validate these positions<sup>1</sup> was not meant to slow down the remedial process in any way, but merely to indicate to the Navy that EPA did not view these statements as helping the reader to objectively come to any scientific conclusions regarding contamination at the site. All parties are very busy and we are sure no one finds that time necessary to argue about subjectivity is time well spent. It is suggested that in future Moffett Field documents, care be taken to be as objective as possible, so that both regulators and the community will be able to make decisions from objective points of view.
3. The issue of background is one where the Navy continues to disagree with EPA. Simply stated, if the Navy does additional sampling to establish background for inorganics at Moffett Field, it should be noted that there is no guarantee that the results will be accepted by the regulators. Methods for screening COC's using PRGs have been communicated to the Navy in the past and decisions regarding OU1 and OU2 have been made using offsite background data.
4. Hotspots. No hotspot analysis was done for benzo(a)pyrene or any other COC. If an evaluation of hotspots was done, regardless of how cursory, it should be presented to the regulatory agencies.
5. Purposive Sampling. It seems that the Navy may have misinterpreted the concept of "purposive sampling". While it may be true that an initial site investigation should not involve purposive sampling (sampling intended to better characterize known contamination), it is clear that this type of sampling is necessary to narrow in on hotspots of contamination. How else can one sufficiently characterize nature and extent of contamination once an initial site investigation has been completed?
6. A point should be made regarding the use of Monte Carlo uncertainty analysis. The Navy infers that this analysis tool is widely used, but then claims that development of simulations are still ongoing at Harvard University's Center for Risk Analysis. It appears that an incomplete tool was used at Moffett Field, as EPA stated earlier. The results from this test were unusable, yet the Navy must still pay their contractor for this work. One could argue that the Navy should have questioned the test's usefulness from the start.

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<sup>1</sup>EPA General Comment #1 - risk assessment method overcautiousness

EPA Specific Comment #8 - potential for abuse of frequency of detection criteria

EPA Specific Comment #15 - finalization of guidance documents

## SPECIFIC COMMENTS

7. From EPA General comment #3. The constituent benzo(a)pyrene should be carried through the risk assessment process. If it does drive the risk assessment, a risk management decision can be made on how to proceed by also looking at history of use, areas of high hits, etc. The Navy should perform initial screening using the EPA Preliminary Remediation Goal (PRG) tables. If in fact the highest detection limits<sup>2</sup> for benzo(a)pyrene in soils and sediment are the result of media interference, more proof should be given. By retaining this carcinogen throughout the risk assessment regardless of the questions surrounding the high detection limits, risk managers will be able to see its effect on the total risk. In fact, the areas where the highest detection limits of this constituent are found may be areas for a hotspot analysis to be performed.
8. From EPA Specific comment #9. It is stated here that methylene chloride and chloroform are VOC's. Table 6-47 shows them listed as SVOC's. Also, Table 6-48 does not contain these compounds at all, as the response states. Please clarify.
9. From EPA Specific comment #12. The Navy agreed to incorporate this statement regarding carcinogen risk levels, but it does not appear in the draft final.
10. From EPA Specific comment #13. Please be sure that the correct GI absorption factor for inorganics, 5%, is used in the formula for toxicity factors and not .05% as shown in Tables 6-62 and 6-63.

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<sup>2</sup>For example, Table A-3A.1 shows detection limits of 260,000 ppb for SSNC-002 and 400,000 ppb for SSNC-003, 15,000 ppb for SSRP-013.