

MOFFETT FEDERAL AIRFIELD
RESPONSE TO COMMENTS ON
INSTALLATION RESTORATION PROGRAM
OPERABLE UNIT 2 - EAST RECORD OF DECISION

OCTOBER 28, 1994

This report presents point-by-point responses to regulatory agency comments on the Draft Final Operable Unit 2 - East (OU2-East) Record of Decision (ROD) prepared by PRC Environmental Management, Inc. (PRC) for Moffett Federal Airfield (Moffett Field), California. Mr. Michael Gill of the U.S. Environmental Protection Agency (EPA) submitted comments in a letter dated October 7, 1994. Mr. Joseph Chou of the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), submitted comments in a letter dated October 13, 1994.

Comments from Mr. Michael Gill, EPA

SPECIFIC COMMENTS

Comment 1: Page 1, "Assessment of Site", 2nd Sentence. Insert "any current or potential" between the word "present" and "any human health risks. . ."

Response: The referenced sentence has been revised as suggested.

Comment 2: Page 1, "Assessment of Site". Please add a statement that "The Station-Wide ROD will be the final ROD for the entire base".

Response: The ROD has been revised as suggested.

Comment 3: Page 1, "Description of the Selected Remedy". Insert before the first sentence:

A No Action site is a site where remedial action is not necessary to protect human health and the environment. No action (i.e., no treatment, engineering controls, or institutional controls such a groundwater monitoring) would be warranted under the following general sets of circumstances applicable to sites found in OU2-East:

- Where the baseline risk assessment concluded that conditions at the site pose no unacceptable risks to human health and the environment
- Where a release involved only petroleum product that is exempt from remedial action under CERCLA Section 101
- Where a previous response eliminated existing and potential risks to human health and the environment such that no further action is necessary

Response: The ROD has been revised as suggested.

Comment 4: Page 3, "Declaration Statement", First Sentence. Please explain that the hazardous substances (beryllium) that will remain on site are not within the acceptable risk range, but do not pose a risk to human health because of the spatial analysis results.

Response: The ROD has been revised as suggested.

Comment 5: Page 3, "Declaration Statement". Please state in this section that the soils from the site were evaluated for potential impacts to groundwater and that none exist. Also mention that the aquifers beneath the east side soils are being addressed in the OU5 process.

Response: The ROD has been revised as suggested.

Comment 6: Page 3, "Declaration Statement". Please replace July Anderson-Rubin and her title with John Wise, EPA Region 9, Deputy Regional Administrator.

Response: The ROD has been revised as suggested

Comment 7: Section 1.3, Paragraph 1, Sentence 2. The EPA has provided a TAG to SVTC since 1993, not 1989.

Response: The ROD has been revised as suggested.

Comment 8: Section 1.3, Paragraph 1, Sentence 4. The TAG is not a separate group from the TRC, but a grant awarded to a member of the TRC.

Response: The referenced paragraph has been revised to clarify that the TAG is not a separate group, but a grant.

Comment 9: Section 1.4, Page 10. Change title to "Scope and Role of No Action."

Response: The ROD has been revised as suggested.

Comment 10: Section 1.4, Page 10. Insert before the first paragraph:

The scope of the No Action process is to address categories of sites where remedial action is not necessary to protect human health and the environment, or CERCLA does not provide the appropriate authority to take any remedial action at the site.

Response: The ROD has been revised as suggested.

Comment 11: Section 1.4, Page 10, Table. Please update the date for the OU5 ROD schedule to 6/1/95.

Response: The ROD table has been updated as suggested.

Comment 12: Section 1.4, Page 10, Paragraph 2, last sentence. The sentence should read "This ROD will not need to be amended based on the results of the ecological assessment." Remediation of ecological areas, if necessary, will be covered by the Station Wide ROD.

Response: The ROD has been revised as suggested.

Comment 13: Section 1.4, Page 10, Paragraph 3, 2nd Sentence. Insert after the word "strategy," which utilizes the use of No Action RODs allows resources. . ."

Response: The ROD has been revised as suggested.

Comment 14: Section 1.5, Page 11, Paragraph 3, last sentence. The response to EPA's comment #20 on the Draft OU2-E ROD is unsatisfactory. The Navy needs to reference the fact that the Quality Assurance Project Plan of July 1992 was considered in the remedy selection at OU2-E.

Response: The reference for the OU2-East RI Quality Assurance Plan was inadvertently omitted. The quality assurance plan implemented during the OU2 RI, however, was not the July 1992 plan referenced in the EPA comment. The plan implemented was the March 1988 Final Work Plan for Remedial Investigation at Naval Air Station Moffett Field, California, Volumes I through V.

Comment 15: Section 1.6, Page 16, Paragraph 2. This section does not read well and does not seem to support you conclusion that "No Action" is the appropriate avenue to take. Consider the following language for insertion after the first paragraph on p. 16:

The overall screening criterion for a No Action Site is an acceptable level of protection for human health and the environment. This acceptable level of protection requires that the reasonable maximum risk of exposure for a person to site-related chemicals results in an estimated additional risk of developing cancer of less than one-in-one million, and is without appreciable risk of deleterious noncancer health effects. This is in accordance with the National Contingency Plan and CERCLA guidance.

Response: The referenced paragraph is required to explain acceptable health risk levels. It was modified to the current language based on EPA's comments on the Draft ROD. During a phone conversation with Mr. Michael Gill (EPA) on October 18, 1994, it was agreed to add the suggested EPA paragraph to the existing paragraph.

Comment 16: Section 1.6, Page 16, Paragraph 2. Insert before the last sentence:

If concentrations of chemicals at a site are within the risk range no action would need to be taken to protect human health and the environment. Risk management. . .

Response: The ROD has been revised as suggested.

Comment 17: Section 1.6, Page 16, Paragraph 2, last sentence. Clarify that "Risk management" allows discretion on the part of the project team to make management decisions within bounds on how to proceed to a Record of Decision at a site.

Response: A sentence has been added to page 16, Section 1.6, fourth paragraph to clarify the risk management discussion, as suggested.

Comment 18: Section 1.6, Page 16, Paragraph 3. The purpose of this paragraph is to say that no action is warranted at this site. Please rewrite this in laymen's terms to get this point across more clearly.

Response: The purpose of this paragraph was not to state that no action is warranted. Rather, it is intended to provide additional information supporting the no action decision. The language used is necessary to describe the evaluation of beryllium concentrations and why beryllium is not a site contaminant. During a phone conversation with Mr. Michael Gill (EPA) on October 18, 1994, it was agreed that the language used is adequate and only minor clarifications should be made. Those clarifications have been made to the referenced paragraph.

Comments from Mr. Joseph Chou, DTSC

Specific Comments

Comment 1: Page 1, 2nd Paragraph; Declaration Statement. The last sentence should read "The U.S. Environmental Protection Agency (EPA) and the State of California also concurred with the decision."

Response: The ROD has been revised as suggested.

Comment 2: Page 10, first paragraph; Scope and Role of Response Action. Please clarify that twenty-three sites have been identified in the Installation Restoration Program.

Response: The ROD has been revised as suggested.

Comment 3: Page 10, Schedule. Please correct the ROD schedule for OU5 and OU6 as follows:

<u>OU Designation</u>	<u>OU Description</u>	<u>ROD Schedule</u>
OU5	East Side Aquifer	June 1, 1995
OU6	Wetland Areas	Will be covered by station-wide ROD

Response: The ROD schedule has been revised as suggested.