



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

February 13, 1995

Mr. Stephen Chao  
Naval Facilities Engineering Command  
Engineering Field Activity, West  
900 Commodore Way, Bldg. 101  
San Bruno, CA. 94066-2402

Re: *Draft Final Operable Unit 5 Proposed Plan*, dated February, 1995

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and provides the following comments. As specified in the Federal Facility Agreement (FFA) §9.9, the period between the draft final and the final submittal of a primary document normally is considered an informal dispute period. That is, if the regulatory agencies have any issues that must be addressed, the document should not be finalized. These comments are similar to those communicated in the OU5 Draft Final Feasibility Study comments and should not prevent finalization of the document. 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)  
Michael Bessette (RWQCB)  
Ken Eichstaedt (URS)  
Sandy Olliges (NASA)  
Peter Strauss (MHB)  
Mike Young (PRC) (Fax)

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**COMMENTS** *Draft Final Operable Unit 5 Proposed Plan, dated February, 1995*

1. Page 1, Introduction, para 1. The first sentence should be changed to read "...Navy invites the public to comment...".
2. Page 1, Introduction, para 1. Please boldface the word "**aquifers**" (defined in the glossary).
3. Page 1, Introduction, para 3. It is not clarified here how much of the southern plume is being proposed for treatment. EPA finds the entire plume treatment to be the most effective proposed remedy for the southern plume.
4. Page 3, Facility Background, para 1, sentence 1. Please add a reference to Figure 1 here: "...and 10 miles north of San Jose, California (see Figure 1)."
5. Page 4, Summary of Site Risks, para 1. Please boldface the word "**receptors**" (defined in the glossary).
6. Page 4, Summary of Site Risks, para 3. Please change the first sentence to read: "In the foreseeable future, Moffett Field...".
7. Page 4, Summary of Site Risks. There is no mention of the risks from inorganics in this section. Please clarify this.
8. Page 4, Summary of Site Risks, last para, sentence 5. This sentence should read: "...for protection of aquatic life in surface water".
9. Page 6, Summary of Alternatives, Alternative 3. The last sentence should be clarified to read "The groundwater will have to be treated if it is to be used as a drinking water supply because VOCs and background concentrations of metals exceed drinking water standards".
10. Page 6, Summary of Alternatives, Alternative 4A. Please mention the bench test of the Iron Curtain technology and the associated results.
11. Page 6, Summary of Alternatives, Alternative 4B. Please mention the treatability study of the AS/SVE technology and the associated results.
12. Page 7, last para. How is the Navy going to justify leaving behind inorganics in the groundwater that have concentrations higher than MCLs? Please see EPA's Draft Final OU5 FS comments.
13. Page 9, Long-Term Effectiveness. Same comment as above - How is the Navy going to justify leaving behind inorganics in the groundwater that have concentrations higher than MCLs?
14. Page 9, Long-Term Effectiveness. Please be specific when discussing the timeframe to achieve cleanup goals.
15. Page 9, Short-Term Effectiveness, para 2, sentence 8. This sentence should read "None of the alternatives can affect background metal concentrations; therefore...".
16. Page 9, Costs. Please provide a small table with costs of the alternatives for comparison.