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Ser 1843/6019
November 6, 1995

Mr. Michael Gill
U.S. Environmental Protection Agency
Region 9, Mail Stop H-9-2
75 Hawthorne Street
San Francisco, California 94105

Subj: Submittal of Draft Final Station-wide Remedial Investigation Report (RI), Moffett Federal Airfield

Dear Mr. Gill:

The Navy appreciates the efforts by the EPA and the State agencies to resolve the issues relating to the Station-wide RI. This letter is written in response to your letter dated October 31, 1995 which discussed regulatory agency concerns about the submittal of the Draft Final Station-wide RI Report for Moffett Federal Airfield. Your letter included a list of "requirements" to include in the draft final RI's risk assessment and a request for written agreement on these "requirements." The Navy agrees to all of the items listed in the October 31, 1995 letter with clarification of item 4.(f). This item stated that the risk assessment should:

"Use an area size that is representative of a typical lot size for Santa Clara County for the residential scenario of the area risk calculation; provide documentation to support your choice."

The Navy will ascertain the typical lot size for Santa Clara County and provide documentation to support that determination. But in light of the schedule constraints, since the Navy has already completed an evaluation of the area risk assessment using 1/2 acre lots based on our interpretation of EPA guidance, these risks shall be presented in the Draft-Final Station-wide RI. It is the Navy's opinion that by furnishing the point risk and the area risk, using 1/2 acre lots, will provide adequate information to produce remedial decisions. Nevertheless, following consultation with the agencies, the Navy will be prepared to evaluate risks using smaller lot sizes if the need arises in order to determine remedial action sites.

The Navy would also like to note that comments from the agencies on the conduct of the risk assessment were received from the California Department of Toxic Substances Control (DTSC) on August 21, 1995. The original due date for the draft final document would then be October 20, 1995 not September 20, 1995 as stated in your letter of October 31, 1995. The Navy apologizes for the lack of timeliness of the original request for extension. The Navy believes that

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with resolving the issues identified thus far will allow us to complete future documents based on a scientifically defensible risk assessment.

If you have any questions, please call me at (415) 244-2563.

Sincerely,

Original signed by:
STEPHEN G. CHAO
BRAC Environmental Coordinator

Copy to:

Department of Toxic Substance Control (Attn: Joseph Chou)
Regional Water Quality Control Board (Attn: Michael Bessette)
Navy Environmental Office (Attn: Don Chuck)
NASA Ames Research Center (Attn: Sandra Olliges)
PRC Environmental Management, Inc. (Attn: Michael Young)
MHB Technical Associates (Attn: Peter Strauss)

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