



STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROLREGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

April 30, 1996

Commander
Department of the Navy
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Stephen Chao, Project Manager
900 Commodore Drive, Bldg. 101
San Bruno, California 94066-2402

Dear Mr. Chao:

**NAVY'S RESPONSES TO AGENCIES COMMENTS ON THE DRAFT FINAL STATION
WIDE REMEDIAL INVESTIGATION(SWRI) REPORT, MOFFETT FEDERAL
AIRFIELD**

The Department of Toxic Substances Control (DTSC) has reviewed the subject document. In general, the Navy's response to our comments were satisfactory. However, as indicated below, there are several comments we either do not agree with or where we have suggestions for improving the presentation of the risk assessment. Please incorporate all comments into the final report. If you have any questions, please call me at (510) 540-3830.

Sincerely,

Handwritten signature of C. Joseph Chou in cursive.

C. Joseph Chou
Remedial Project Manager
Base Closure Unit
Office of Military Facilities

Enclosure

cc:

Mr. Michael Bessette
Regional Water Quality Control Board
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Mr. Michael D. Gill
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GENERAL COMMENT

Many of the outstanding differences between the Navy's and DTSC's position regarding the Station Wide Risk Assessment were resolved at our meeting of February we, 1996. DTSC will withhold final evaluation of the document until after our review of the revised version.

SPECIFIC COMMENTS

1. Navy's Response to Specific Comment 7:

DTSC acceded to the use of a residential lot size greater than recommended in DTSC's guidance in the SWRI because of Navy's assertion they could demonstrate that due to sampling density, the larger areas did not change the estimated risk. This does not mean that DTSC has changed their guidance on lot size nor will it approve a larger area at other sites in the future. In any risk management decisions at Moffett Field regarding actual or planned future residences, any increase in risk as a result of the use of a larger lot size should be individually assessed, and if indicated, risks recalculated using an appropriate value for lot size.

2. Navy's Response to Specific Comment 8:

DTSC is not recommending a reevaluation of ambient concentration of metals. In general, the methods presented in the SWRI are not favored by DTSC. The recommended procedure on how to define ambient concentrations of metals was included (Attachment A) in our letter dated January 31, 1996. In addition, DTSC is currently preparing a guidance document on estimation of ambient levels of inorganics.

3. Navy's response to Specific Comment 11:

The DTSC default value for dermal adherence is 1.0 mg/cm² as outlined in DTSC's Supplemental guidance and Preliminary Endangerment Assessment Manual. The practice that has been uniformly followed at sites (Federal and Non-Federal) where U.S EPA and DTSC have joint oversight is that where guidance between the two agencies differs, the most health protective guidance is followed. Use of 0.2 mg/cm² as a dermal adherence factor is not acceptable to DTSC except in the specific case of "Cal Modified" Region IX Preliminary Remediation Goals (PRGs) which may only be used for site screening at military bases. In the present case under discussion, a risk assessment is being conducted, not site screening using Region IX PRGs.

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4. Navy's Response to Specific Comment 12 and 13:

The "plumes" shown in the figures are in fact isopleths of risk in groundwater. We are puzzled as to why the response state otherwise.

5. Navy's Response to Specific Comment 22:

The Navy's response is not incorrect, but the figures could be improved by using cross-hatching where pathways are removed. Additionally, an explanation should be added to the text and to the text and to the tables indicating that contaminants still be contaminants present post-remediation, but remedial measure will have interdicted the exposure pathways.