



DQH: 218-1

July 30, 1996

Reply to Attn of:

Mr. Stephen Chao
Department of the Navy
Engineering Field Activity, West
900 Commodore Way, Building 208
San Bruno, California 94066-0720

Dear Mr. Chao:

NASA has reviewed the Navy's *Draft Final Phase II Site-Wide Ecological Assessment* (SWEA) Report and would like to offer the following comments:

1. Page ES-2, BACKGROUND, 3rd paragraph, 3rd sentence.
Please note that MFA is now divided into OU1, OU2, OU5 and OU6. OU3 was deleted and Sites 12 and 15 were deferred to the IRP Petroleum Sites Program. OU4 was deleted and OU5 was modified to include all aquifers not part of the regional groundwater plume.
2. Page ES-5, PROJECT OVERVIEW, Site Setting, 6th paragraph.
The document states that large upland areas of the base are paved or minimally landscaped which does not provide valuable habitat. It should be noted that the Shenandoah Plaza area provides a large landscaped area (extensive lawn and mature trees) which provide habitat for wildlife species; especially colonies of urbanized birds. The figure which depicts upland conditions should be revised to include the Shenandoah Plaza area (Figure 4-4).
3. Page ES-6, PROJECT OVERVIEW, Site Setting, last paragraph, last sentence.
Please rewrite the sentence as follows; Storm water in the western portion of "MFA" currently drains to the storm water retention ponds in the northwestern portion of "MFA" via a settling basin and the Eastern Diked Marsh.
4. Page ES-8, RESULTS, Upland Soil Chemistry, 2nd paragraph, 3rd sentence.
Consistently label sites; Golf Course Landfills 2 and 3 (Sites 22 and 23) ... Marriage Road (Site 3).
5. Page ES-10, RESULTS, Organism Tissue Chemistry, 2nd and 3rd paragraph.
Were sufficient insect samples collected for analysis to definitively state that "these COPECs were not detected"?

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6. Page ES-10, RESULTS, Organism Tissue Chemistry, 3rd paragraph.
Please clarify from which Golf Course Landfill (Site 22 or Site 23) the earthworms were collected.
7. Page 2-5, SITE SETTING, SURFACE WATER..., Surface Water Hydrology, 1st paragraph.
Including figures 4-6 and 4-7 from the Phase I SWEA would be helpful in this section.
8. TABLE 2-4, SUMMARY OF POTENTIAL ADVERSE ECOLOGICAL EFFECTS, Organochlorine Pesticides, DDE.
For the American kestrel, please verify that the observed effect was "reproductive success".
9. Page 4-11, SEDIMENT, Salt Marsh Harvest Mouse, 1st paragraph.
Only one salt marsh harvest mouse was trapped because the trapping effort was conducted for another mammal and the bait was inappropriate for trapping the salt marsh harvest mouse. Although one salt marsh harvest mouse was trapped, it has been assumed that there are more.
10. Page 5-30, UPLAND SOILS, Metals in Upland Soils, 1st paragraph, 4th sentence.
Please correct text to read: 5-15a, 5-15b, and 5-15c.
11. Page 6-21, AVIAN RECEPTORS, Distribution of Receptors, 6th paragraph, 3rd sentence.
Site 15 consists of nine sumps and oil/water separators at various locations. Clarification of the following sentence is requested; "burrows situated near Building 650 are in the same general location as one of the IRP Site 15 locations."
12. Page 7-7, BENTHIC RECEPTORS, Pore Water Toxicity Benchmarks, 3rd bullet.
Please reference acronym "LOAEL" in the ABBREVIATIONS and ACRONYMS list.
13. Page 7-17, MAMMALIAN AND AVIAN RECEPTORS, TRVs for Evaluation of Inhalation Exposures (Burrowing Owl), Literature Search, 3rd paragraph, last sentence.
Please include the scatter plots in Appendix J.
14. Page 8-6, SURFACE WATER RECEPTORS, Surface Water Bioassay Results, 2nd paragraph, 6th sentence.
The 25 and 50 percent dilution samples of SWNC-18 showed a statistically significant reduction in growth. What is the cause of this reduction?

15. Page 10-5, RISK SUMMARY, Analysis, 1st paragraph, 7th sentence.
Was there an analysis done of the dissolved constituents to determine the amount of overestimation of the exposure and potential risk of the total constituents?

16. Page 11- 7, RISK SUMMARY, Confidence in Chemical Stressors Posing the Risk, 2nd paragraph, 1st sentence.
Please rewrite the sentence using "pore water".

20. Page 11-9, ECOLOGICAL SIGNIFICANCE OF RISK ESTIMATES, 8th paragraph, 1st sentence.
What is meiofauna?

Thank you for the opportunity to review and comment on the *Draft Final Phase II Site-Wide Ecological Assessment* Report. If you have any questions regarding these comments, please feel free to call me at (415) 604-3355 or Tina Pelley at (415) 604-1315.

Sincerely,



Sandra Olliges, Branch Chief (Acting)
Safety, Health and Environmental Services Office

cc: Elizabeth Adams, U.S. EPA
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