

**MOFFETT FEDERAL AIRFIELD**

**RESPONSE TO COMMENTS ON  
DRAFT FINAL OPERABLE UNIT 5 RECORD OF DECISION**

**JUNE 28, 1996**

This report presents point-by-point responses to regulatory agency comments on the May 10, 1996 Draft Final Operable Unit 5 (OU5) Record of Decision (ROD) prepared by PRC Environmental Management, Inc. (PRC) for Moffett Federal Airfield (Moffett Field), California. Comments were provided by Mr. Michael Gill of the U.S. Environmental Protection Agency (EPA) in a letter dated May 31, 1996. Comments were also provided by the California EPA from Mr. C. Joseph Chou of the Department of Toxic Substances Control (DTSC) and Mr. Michael Rochette of the Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) in letters dated June 11, 1996.

**EPA GENERAL COMMENT**

Comment 1: EPA considers the operation of Building 191 to be a necessary component of the OU5 remedy. The responses to EPA comments were insufficient, as they state that its operation is not part of the Navy's remedy as an engineering or institutional control.

Since these responses were sent to us, Jeannie Cervera, EPA's attorney, has had discussions with Marvin Norman, Navy's legal counsel, wherein he has agreed that the operation of Building 191 is a necessary component of the OU5 remedy. Accordingly, we suggest the following language be inserted in the proper places of the ROD's text and Responsiveness Summary (see EPA Draft OU5 ROD comments 2, 25, 30).

"The continued operation of Building 191, the pump station, is necessary for successful implementation of the OU5 cleanup (and for continued runway operation) and is therefore considered part of the selected OU5 pump and treat remedy. Without its operation, flooding of the northern end of the runways and surrounding areas, including portions of the golf course, which overlie the OU5 east-side aquifers, could occur during the rainy season. In addition, saltwater infiltration could negatively impact the pump and treat

system. Therefore, the Building 191 pump station is a component of the groundwater remedy and must remain operational."

*Response: The Navy agrees that continued operation of the Building 191 pump station (or similar lift station operation) is necessary for successful implementation of the remedy selected for OUS. The Moffett Field drain system and pump station operation are also essential aspects of current land use by the National Aeronautics and Space Administration (NASA) as well as all other reasonably foreseeable future land uses. Without continued pump station operation, flooding of the northern portion of the base, including the northern end of the runways could occur during the rainy season. Therefore, the pump station operation is taken into account as an aspect of current land use and a component of the remedy that must remain operational. The operation of the pump station will be considered in the design and implementation of the remedy, with appropriate institutional controls implemented by the federal government to assure continued operation and maintenance of the pump station and drain system. Appropriate changes have been made to the Record of Decision (ROD) and responsiveness summary.*

## **EPA SPECIFIC COMMENTS**

**Comment 2:** Page DS-2, Third Bullet. Are there any ARARs that are triggered by discharging to a storm drain? If the drain runs to a publicly-owned treatment works (POTW), ARARs will not be triggered because a POTW is considered off-site for ARAR purposes. Are there any ARARs that can be triggered by the "other potential uses?"

*Response: The applicable or relevant and appropriate requirements (ARARs) which are triggered by discharge to the storm drain are listed in Table 6 of the ROD under the Surface Water Discharge heading. No further discussion of the ARARs is needed in the text of the declaration statement. The term "other potential uses at the facility" has been deleted from the document.*

Comment 3: Section 2.0, Page 26, Alternative 5A. It is particularly important to describe what the "groundwater restrictions" are, since this is the alternative that has been selected as the remedy.

*Response: The text has been changed to indicate that domestic use of groundwater in OU5 will be prohibited in the Master Plan for the government's land uses. Restrictions on use of groundwater at OU5 will remain in effect until the cleanup standards are achieved.*

Comment 4: Section 3.0, Page 27, ARARs Requirements. As we have indicated in previous comments, please provide a discussion on what an ARAR is (chemical, action, and location), when it applies, where it applies (on site/off site), how ARARs are selected, etc. See comment 23 and attachment 1 of EPA's comments on the Draft OU1 ROD for example information. It will give you an example of an ARARs discussion.

*Response: This section has been revised using information contained in Attachment 1 of EPA's comments on the Draft OU1 ROD as appropriate.*

Comment 5: Section 3.1, Page 28, Table 4. Do not cite any regulations/laws that are not ARARs. Delete the discussion on maximum contaminant level goals (MCLGs) and secondary maximum contaminant levels (SMCLs) (state and federal).

*Response: Citations of regulations and laws which are not ARARs have been deleted from Table 4.*

Comment 6: Section 3.1, Page 30, Table 4, Resolution 92-49. This section is confusing. Do you intend to say that Resolution 92-49 is relevant and appropriate rather than applicable? You cite Section G. Is this the section you believe to be relevant and appropriate? If so, state so more clearly.

*Response: The citation of Resolution 92-49, Section G as relevant and appropriate has been included.*

Comment 7: Section 3.2, Page 32, Table 5, Flood Plain. In the ROD, a regulation must be definite. The regulation must either be applicable or relevant and appropriate. You cannot state that it "may be applicable" because the ARARs freeze at the time of signing the ROD. Thus, the regulation either is or is not an ARAR.

*Response: The regulation is not an ARAR for the remedy. Therefore, it has been deleted from Table 5.*

Comment 8: Section 3.2, Page 32, Table 5, Critical Habitat. Again, ARARs freeze in the ROD. You cannot postpone making an ARAR determination for some future time.

*Response: The final OUS Feasibility Study Report (PRC 1995) has indicated that there is no risk to ecological receptors at OUS. Therefore, this entry will be deleted from the table.*

Comment 9: Section 3.3, Page 33, Table 6, Surface Water Discharge. A POTW for ARAR purposes is considered off-site. Thus, discharges to a POTW will have to meet both substantive and administrative requirements. If you have identified the NPDES regulations because of the POTW discharge you can either delete it, because it is not an ARAR, or you can explain that both administrative and substantive requirements will be met.

*Response: The NPDES requirements have been identified as ARARs because treated groundwater may be discharged to local surface waters if water reuse and discharge to a POTW are infeasible. The comment column has been revised to clarify this issue.*

Comment 10: Section 3.3, Page 33, Table 6, Surface Water Discharge #2. Federal WQC are not ARARs if the state has established numeric discharge limitations for surface water discharges that are more stringent than the federal WQC. If the federal WQC is not an ARAR, it should be deleted.

*Response: The water quality criteria (WQC) contained in the Water Quality Control Plan, San Francisco Bay Region 2, are more stringent than the federal WQC. Therefore, the federal WQC are not considered ARARs and have been deleted from Table 6.*

**Comment 11:** Section 3.3, Page 35, Table 6, Air Emissions. Provide citations for the air rules and regulations. Without seeing a summary of the nuisance rule/regulation, it is difficult to tell whether it is an ARAR.

*Response: The citation of San Francisco Bay Area Air Quality Management District (BAAMQD) Regulation 8-47 has been added to Table 6.*

**Comment 12:** Section 3.3, Page 35, Table 6, Land Treatment. Is land treatment of hazardous waste a part of this remedy? If it is, the ARARs must be more specific. If it is not, these regulations are not ARARs.

*Response: The regulation is not an ARAR for the remedy. Therefore, it has been deleted from Table 6.*

**Comment 13:** Section 3.3, Page 35, Table 6, Incineration. Is incineration of hazardous waste a part of this remedy? If it is, the ARARs must be specifically identified. "Certain requirements could be relevant and appropriate" is not an appropriate identification of ARARs.

*Response: The regulation is not an ARAR for the remedy. Therefore, it has been deleted from Table 6.*

**Comment 14:** Section 3.3, Page 36, Table 6, Storage or Treatment of Tanks; Thermal Treatment; Chemical, Physical, or Biological Treatment; Miscellaneous Units. Specifically identify what requirements are relevant and appropriate. "Certain requirements could be relevant and appropriate" is not an appropriate identification of ARARs.

*Response: The text has been changed to indicate that the requirements in 22 California Code of Regulations (CCR), Chapter 30, Articles 24 and 25 are relevant and appropriate because storage tanks will be used for storage and treatment during the remedy. The other citations have been eliminated as ARARs.*

**Comment 15:** Section 3.3, Page 36, Table 6, Disposal in Landfill. Will waste be disposed of in a landfill as part of this remedy? If no, the regulation is not an ARAR. In addition, if you dispose of waste off site, the regulations would not be ARARs because it is an action that is taking place off site. However, all applicable laws will have to be complied with for all off-site actions.

*Response: No waste will be disposed of in a landfill, therefore this citation has been deleted from Table 6.*

**Comment 16:** Section 4.0, Page 39, Last Paragraph, Sentence 2. Explain what you mean by the following sentence: "Specific requirements for action-specific ARARs may be different for various alternatives." The ROD should specifically state all requirements that are ARARs.

*Response: The text has been changed to remove the sentence cited.*

**Comment 17:** Section 5.0, Page 43. The ROD selects the groundwater standards for the remedy. These standards are enforceable numbers that determine when the system can be turned off, i.e., when the ARAR has been met. Accordingly, change groundwater cleanup "goals" to groundwater cleanup "standards."

*Response: The text has been changed as suggested. In addition, cleanup of the groundwater to the cleanup standards using the selected remedy may not be significantly faster than through natural processes.*

Comment 18: Section 6.0, Page 43, Sentence 1. You mention that access will be restricted. Is the "access restriction" the same as the "groundwater restrictions" you mention on page 26? What are the access restrictions? What are the groundwater restrictions?

*Response: The text has been revised to clarify that restrictions will be emplaced on use of the shallow aquifer at OU5 for domestic purposes. This restriction will be noted in the Master Plan for the government's land uses until the treatment standards are met.*

Comment 19: Table 9, Page 44. The State of California MCL for vinyl chloride is 0.5 parts per billion (ppb) and should be substituted for the less stringent federal MCL noted in this table.

*Response: The text has been revised as suggested.*

Comment 20: Declaration Statement, Page DS-3. Please delete Julie Anderson's name from this signature page, as she has accepted a new position outside of the Federal Facilities Cleanup Office here at EPA. Leave the title in for an acting director to sign the ROD.

*Response: The text has been revised as suggested.*

#### **DTSC GENERAL COMMENTS**

Comment 1. The long-term operation and maintenance (O&M) of the pump station at Building 191, is critical for the successful groundwater remedial actions at OU5 and other OUs. The ceasing of Building 191 operation will cause flooding at the northern part of Moffett Field which could cause the need for more extensive remedial work. Therefore, it is necessary to clearly address that the Building 191 pump station will remain operational in the final ROD.

*Response: The Navy agrees that continued operation of the Building 191 pump station (or similar lift station operation) is necessary for successful implementation of the remedy selected for OU5. The Moffett Field drain system and pump station operation are also essential*

*aspects of current land use by NASA as well as all other reasonably foreseeable future land uses. Without continued pump station operation, flooding of the northern portion of the base, including the northern end of the runways could occur during the rainy season. Therefore, the pump station operation is taken into account as an aspect of current land use and a component of the remedy that must remain operational. The operation of the pump station will be considered in the design and implementation of the remedy, with appropriate institutional controls implemented by the federal government to assure continued operation and maintenance of the pump station and drain system. Appropriate changes have been made to the ROD and responsiveness summary.*

Comment 2. Neither Table 5 nor Table 6 includes any column for "ARAR determination." It looks as though the Navy has included some determinations in the column entitled "Comments," but the determinations have not been made for all citations. Additionally, where determinations have been made in the "Comments" column, they are not particularly clear. For example, the citation "Coastal Zone Management Act and California Coastal Act of 1976" (Table 5, page 32), the comment is "OU5 is a coastal zone. For any RA involving discharge in the coastal zone, this would be applicable." By this comment the Navy does not specify whether it intends to discharge into the coastal zone, nor whether these two coastal acts' requirements are applicable to the remedy selected in this OU. On the same page, with respect to the first citations (40 CFR 6, Appendix A; 40 CFR 264.18(b), and 40 CFR 761.75) the Navy's comment does not commit to a position on the applicability of these requirements. Similar noncommittal ARAR determinations can be found elsewhere in Tables 5 and 6 as well. This issue should be clarified and resolved before the ROD is finalized to limit chances of future conflict over applicable requirements.

*Response: Tables 5 and 6 have been revised to show the specific ARAR determination for each citation listed.*

## DTSC SPECIFIC COMMENTS

Comment 1. Page 8, Third Paragraph, Section 1.3. Please note that the Silicon Valley Toxic Coalition (SVTC) received two technical assistance grants (TAGs) in 1993 and 1994 to assist the community understand environmental cleanup technical issues at Moffett Field. In addition, since the technical review committee (TRC) was formed in 1989, it might be appropriate to discuss the function of TRC first.

*Response: The text has been revised to indicate that the TRC was formed in 1989 and that SVTC has received two technical assistance grants for Moffett Field.*

Comment 2. Page 42 to 43, Section 5.0. Please include the selected remedy for the northern plume in this section. In addition to the long-term groundwater monitoring, the Navy should identify a contingency plan to ensure that proper actions will be taken, if elevated concentrations of chemicals of concern (COCs) are found in the monitoring wells.

*Response: The text has been revised to indicate that no action except for groundwater monitoring is required for the northern plume. The selected remedy will be reviewed in accordance with CERCLA Section 104 within 5 years after commencement of remedial action to verify that the remedy continues to provide adequate protection of human health and the environment. If groundwater concentrations in the northern plume exceed water quality criteria for protection of aquatic life (see Table 9 of the ROD), potential risks to ecological receptors could occur. In this situation, the Navy will address the elevated concentrations consistent with emergency response procedures outlined in CERCLA and the NCP. The Navy does not believe that identification of a contingency plan is warranted at this time.*

## RWQCB GENERAL COMMENTS

Comment 1. Because of the uncertainty surrounding the final discharge method of treated groundwater, include Board Resolution 88-160 as an action-specific ARAR. To summarize, the resolution states the Board's position urging reclamation of extracted

groundwater and thus allowing a discharge to POTW only after finding reclamation is to be technically and economically infeasible. Subsequently, only after both reclamation and a discharge to a POTW are found to be technically and economically infeasible will the Board adopt NPDES permit.

*Response: The text of Section 5.0 has been revised to indicate that the evaluation of the specific discharge option will conform to the procedures outlined in RWQCB Resolution 88-160.*

**Comment 2.** Revise all discussions of treated groundwater discharge "to the Moffett Storm Drain" and replace with a discharge "to local surface waters under an NPDES permit."

*Response: The text has been revised as suggested.*

**Comment 3.** Specify the institutional controls for restricting use and access to the groundwater and overlying property. Any use or access restrictions should be incorporated into the property deed prior to ROD signature and not an unspecified future land transfer date.

*Response: The institutional controls for this remedy will be noted in the Master Plan for the government's land uses. In the event of any future conveyance or alternate land use, the subsequent landowners will be required to re-evaluate the remedy in light of their intended land uses and implement other appropriate institutional or engineering controls.*

**Comment 4.** Pumping operations at Building 191 need to be identified as part of the remedial system and discussed within the text regarding groundwater hydraulic control and surface water flood control.

*Response: The text has been revised to indicate that continued operation of Building 191 and the associated drainage system is a portion of the selected remedy.*

## **RWQCB SPECIFIC COMMENT**

Comment 1. Table 6. Include San Francisco Bay RWQCB Resolution 88-160 as an action-specific ARAR for Potential Actions of Surface Water Discharge, Discharges to Groundwater and, to the previously unidentified action, Discharges to POTWs.

*Response: The text of Section 5.0 has been revised to indicate that the evaluation of the specific discharge option will conform to the procedures outlined in RWQCB Resolution 88-160.*

## **REFERENCES**

PRC Environmental Management, Inc. (PRC) 1995. Final Operable Unit 5 Feasibility Study Report, Moffett Federal Airfield, California. August.