

National Aeronautics and  
Space Administration  
**Ames Research Center**  
Moffett Field, CA 94035-1000

N00296.002984  
MOFFETT FIELD  
SSIC NO. 5090.3



Reply to Attn of

DQH: 218-1

FEB 25 1997

Mr. Stephen Chao  
Department of the Navy  
EFA West  
900 Commodore Way, Building 210  
San Bruno, California 94066-0720

Dear Mr. Chao:

The National Aeronautics and Space Administration has reviewed the *Draft Final Station-Wide Feasibility Study Report* submitted for review on November 8, 1996 and provides the following comments.

1. Page ES-2, EXECUTIVE SUMMARY, third paragraph, second sentence. Does the EPA consider the consolidation of landfills a remedial action option?
2. Page 1, Section 1.0, INTRODUCTION, first paragraph, first sentence. Moffett Federal Airfield is located at Moffett Field, California.
3. Page 6, Section 1.2.2, Land and Aquifer Use, second paragraph, first sentence. MFA is "centrally located in Santa Clara Valley (aka Silicon Valley), an industrial and technological center."
4. Page 12, Section 1.2.3, Restoration Sites, Potential Runway Wetland, first paragraph, second sentence. This well was located and has been properly abandoned.
5. Page 14, Section 1.3.1, Human Health Risk Assessment, fifth paragraph, fifth sentence. Please remove the hard return following exposure time ...
6. Page 15, Section 1.3.1, Human Health Risk Assessment, eighth paragraph, fifth sentence and Page 43, Section 2.1.1.2.1, Human Health Risk-Based PRGs, Carcinogenic Risks, first paragraph, first sentence. Please reference Plate 2, Summary of Residential and Occupational Risks from Soil.

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7. Page 15, Section 1.3.1.1, Carcinogenic Risk, Occupational Scenario, first paragraph, fifth sentence. Please reference Plate 2, Summary of Residential and Occupational Risks from Soil.
8. Page 35, Section 1.4.2.1, Contaminated Soil and Sediment, first paragraph, fourth sentence and Page 35, Section 1.4.2.1.1, Potential Federal Chemical-Specific ARARs, first paragraph, third sentence. Please correct "COPC" to "COPEC."
9. Page 35, Section 1.4.2.2, Potential Federal and State Location-Specific ARARs, first paragraph, second sentence. Please note that within the San Francisco Bay Area, the local Coastal Zone Management Act program is the Bay Plan, prepared pursuant to the McAteer- Petris Act of 1965, overseen by the San Francisco Bay Conservation and Development Commission (BCDC). The program is codified as the San Francisco Bay Plan.
10. Page 46, Section 2.1.1.2.1, Ecological Risk-Based PRGs, third paragraph, fourth sentence. Please include the following statement: HI exceeds 10 *but less than 100*.
11. Page 49, Section 2.2.1, Sediments, Containment, second paragraph, last sentence. Please include which remediation response action(s) containment will be considered.
12. Page 55, Section 3.1.4, Removal, first paragraph, last sentence. It has been stated that ecological receptors are in direct contact with the top 2 feet of sediment and that there is contamination located below the proposed excavation level of 1 foot. Will there be some institutional controls to insure the removal of the higher contaminated sediment areas that are located at depths greater than 1 foot?
13. Page 67, Section 3.2.5.2, Glycolate Dehalogenation, first paragraph, third sentence. Please edit the sentence to read: the polyethylene glycol ~~to~~ replaces halogen molecules and renders the compound nonhazardous.
14. Page 90, Section 5.1.3, Removal and Off-Site Disposal, second paragraph, third sentence. Page 55 states that ecological receptors are in direct contact with the top 2 feet of sediment. Here it is stated the exposure pathway is contained within the top 1 foot of sediments. Please be consistent with the depths of exposure contact and pathways.
15. Page 98, Section 5.2.2, Multilayer Cap, Compliance with ARARs. There are no comments referring to the location-specific ARARs. Is the multilayer cap in compliance with location-specific ARARs?

16. Page 100, Section 5.2.2, Multilayer Cap, Cost, first paragraph, sixth sentence. What defines "severe weather"? Please expand on the costs that would be incurred with the "severe weather".
17. Page 105, Section 6.2.2, Balancing Criteria, Long-term Effectiveness and Permanence, first paragraph, first sentence. Please correct the following grammatical error: Alternatives 2 is more effective...
18. TABLE 3, SPECIAL STATUS ANIMAL SPECIES KNOWN OR POTENTIALLY OCCURRING AT MOFFETT FEDERAL AIRFIELD. Please reference the Status letters of "SE" and "ST" in the footnote.
19. FIGURE 8, HABITAT FOR SMALL MAMMALS, INSECTS, KESTREL, PLANTS AND BIRDS. Figure should be revised to include the Shenandoah Plaza area. This is a large landscaped area with extensive lawn and mature trees, which provides habitat for wildlife species; especially colonies of urbanized birds.

Thank you for the opportunity to comment on the Draft Final Station-Wide Feasibility Study Report. If you have any questions or 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  
Michael Gill, U.S. EPA  
Joseph Chou, DTSC  
Derek Whitworth, DTSC  
Michael Rochette, RWQCB  
Don Chuck, Navy MFA  
Ingrid Chen, Raytheon Co.  
Tom Jones, Schlumberger Corp.  
Peter Strauss, MHB