MOFFETT FEDERAL AIRFIELD

RESPONSE TO COMMENTS ON DRAFT OPERABLE UNIT 1 ALTERNATIVES ANALYSIS TECHNICAL MEMORANDUM

APRIL 14, 1997

This report presents point-by-point responses to regulatory agency comments on the draft Operable Unit 1 (OU1) Alternatives Analysis Technical Memorandum submitted February 3, 1997 by PRC Environmental Management, Inc. (PRC) for Moffett Federal Airfield (MFA), California. Mr. Michael Gill of the U.S. Environmental Protection Agency (EPA) submitted comments in a letter dated February 18, 1997. Mr. Joseph Chou of the California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC) provided comments in a letter dated February 25, 1997.

EPA SPECIFIC COMMENTS

Comment 1. We appreciate that the Navy has included a thorough summary of Operable Unit 1's regulatory history in this document. This is important due to the unusual sequence of events surrounding these sites. Please include a similar description in the record of decision (ROD) for clarification.

Response: *A similar discussion of the regulatory history of OU1 will be included in the ROD.*

Comment 2. Table 1. The applicable or relevant and appropriate requirements (ARARs) listed here may not represent the final result of the stringency comparison analysis between federal and state ARARs that are still being discussed. All ARARs issues obviously need to be resolved for the ROD to be finalized.

Response: *The Navy acknowledges that the discussion of state versus federal requirements remains to be resolved between Navy and EPA legal counsels. A footnote will be added to Table 1 to indicate that ARARs are still being finalized.*

Comment 3. Section 1.2.2, Page 7, Last Sentence. "Municipal-type wastes were found to be isolated in a trench..." Please clarify if this is the "bathtub" originally describing the waste area or one of the numerous trenches dug out in the pipeline investigation. The wording here seems to indicate that this trench is larger than one of the investigation trenches.

Response: *The trench in the description represents the waste area, not one of the investigation trenches. The text will be revised to clarify the waste location by referring to the waste area rather than the waste trench.*

Comment 4. Section 3.5, Page 19, Paragraph 2. Please elaborate on what steps will be "taken to allow animals to migrate off site during construction and return after completion".

Response: *Removal of fencing and staging construction activities (that is, planning activities so that they progress gradually across an area rather than affecting the entire area at once) are examples of steps that may be taken to minimize effects on local animal communities. However, a detailed plan to address the affects of construction on local species is beyond the scope of the*

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alternatives analysis technical memorandum. Such a plan is appropriate and will be part of the remedial design for OU1. This information will be added to Section 3.5.

Comment 5. Section 4.0, Page 20, Last Sentence. Groundwater monitoring should be performed in accordance with California Code of Regulations (CCR) Title 23, Chapter 15 requirements (see letter from DTSC dated November 20, 1996, page 2).

Response: *CCR Title 14 regulations incorporate requirements in CCR Title 23. As the ARARs listing in Table 1 indicates, most of the citations for groundwater monitoring requirements are from 23 CCR. A similar situation exists for cap construction requirements and postclosure maintenance requirements. The reference to 14 CCR in the general description of the capping alternative in Section 4.0 is preferred to maintain the clarity and simplicity of the description. Details, such as the further references to 23 CCR, are more appropriate in the ARARs table.*

Comment 6. Sections 5.1 and 5.2. These sections appear to provide an adequate description of the seven criteria necessary for evaluating the appropriateness of a corrective action management unit (CAMU). However, because this portion of the Resource Conservation and Recovery Act (RCRA) has been delegated to the State of California, they (DTSC) have the final authority to grant the CAMU designation, with concurrence from EPA.

Response: *Comment noted.*

Comment 7. Section 5.3.1, Page 27. "Minor modifications to the area may be necessary during remedial design...". Any impacts to the wetlands surrounding Site 1 need to be agreed to by the natural resource trustees, as it provides useful habitat to various ecological receptors.

Response: *Modifications to any wetland areas at Site 1 will be coordinated with the natural resource trustees. Specific details will be incorporated within the OU1 remedial design.*

CAL/EPA SPECIFIC COMMENTS

Comment 1. Section 1.2.2, Page 7, Paragraph 2. The State suggests the Navy should consider working with Pacific Gas and Electric Company (PG&E) to relocate the 36-inch main pipeline at Site 2 prior to commencement of Site 2 remedial construction. We understand that the existence of the pipeline may not have any immediate impacts for either of the two remedial alternatives. However, pipeline relocation will minimize future maintenance problems and will provide more incentives for unrestricted land use. In addition, the relocation work can be very helpful in determining the extent of the waste at Site 2.

Response: *The Navy does not intend to pursue relocating the underground gas pipeline at Site 2 at the present time. Pipeline relocation would delay the cleanup of Site 2 by at least 1 year based on discussions with PG&E staff and on weather-related construction considerations. In addition, future land uses are unknown and relocating the pipeline may not provide further incentives. It is possible that relocating the pipeline could even discourage some uses. PG&E inspectors considered the pipeline in good condition and relocation and subsequent construction of a new pipeline segment would not appreciably reduce maintenance*

requirements. The Navy believes that the waste at Site 2 is adequately identified to proceed with design and construction activities.

Comment 2. Figure 4, Page 10. Please explain how to determine the existence and extent of the sand layer in cross section A-A'. There is no soil boring or trenching data shown in the southern part of the cross section. Similarly, in cross section B-B', there is no direct data between T8 and EB2-1 to support the assumption of discontinuity (dotted line) of waste material.

Response: *The sand layer indicated on cross section A-A' was observed in borings EB2-2 and SB2-17, both located approximately 40 feet west of the cross section. This sand layer also was observed in other borings on the eastern side of Site 2 (for example, at well W2-12). The interpretation shown on cross section A-A' assumes the presence of the sand layer based on this information. The separation of the two waste deposits shown on cross section B-B' is based on two observations. First, no waste was observed during trenching to locate the gas pipeline near the location of boring EB2-1. Second, it is unlikely that PG&E would install a pipeline within waste materials. Either the waste materials were never present at the location of the pipeline or PG&E likely would have removed the waste and replaced it with clean fill material. In either case, cross section B-B' would show a separation of the two waste deposits.*

Comment 3. Table 1, Page 16. Title 22 closure requirements should be considered as ARARs for the OU1 ROD. This concern has been brought to your attention by the State several times through the remedial project manager meetings and our OU1 comments letter (July 18, 1996). The sections listed below are to help the Navy revise the ARARs table: 22 CCR, Division 4.5, Chapter 11, Articles 1 to 5; 22 CCR Division 4.5, Chapter 12, Article 1; 22 CCR Division 4.5, Chapter 14, Articles 1 to 4, 7, 9, 11, and 12; 22 CCR, Division 4.5, Chapter 18, Articles 1 to 5.

Response: *The hazardous waste identification regulations in the pertinent sections of Title 22 CCR Division 4.5, Chapter 11, Articles 1, 2, 3, and 5 are applicable to the characterization of liquid waste and containerized wastes excavated from Site 2. However, observations of the waste materials at Site 2 in trenches and soil borings indicate waste materials at Site 2 are solid wastes, not hazardous wastes. The Navy has concluded that citation of additional Title 22 CCR requirements would impose unnecessary restrictions on the remedial action and are not applicable or relevant and appropriate based on knowledge of the site.*

Comment 4. Section 5.0, Page 24, Paragraph 3. In this section, a concise summary of CAMU regulations has been presented by the Navy. However, the procedure of CAMU designation was not discussed in this section. The Navy should submit the request of CAMU designation for regulatory agency review and approval and the CAMU requirements shall be incorporated into the OU1 ROD.

Response: *Section 5.0 presents the criteria and rationale for designation of Site 1 as a CAMU. This information also will be added to the OU1 ROD. Regulatory agency approval of the ROD also will serve as approval of the CAMU.*

Comment 5. Section 5.1, Page 25, Paragraph 2. Please specify that the seven criteria are from 22 CCR 66264.552(c).

Response: *The text has been modified accordingly.*

Comment 6. Section 5.3.4, Page 30, Paragraph 2. Detailed site-specific information establishing closure requirements at Site 1 should be provided in the text.

Response: *Presentation of detailed site-specific information regarding closure requirements is beyond the scope of the alternatives analysis technical memorandum. This information will be included as part of the OU1 remedial design.*