



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

June 11, 2007

Darren Newton, BRAC Environmental Coordinator  
Southwest Division Naval Facilities Engineering Command  
1455 Frazee Road, Suite 900  
San Diego, CA 92108

Re: EPA Comments on the Navy's Draft Final Addendum to the Revised Final Station-Wide Feasibility Study, Site 25, Former Moffett NAS, dated April 6, 2007

Enclosed are EPA's comments on the Navy's Draft Final Addendum to the Final Station-Wide Feasibility Study for Site 25 at the former Naval Air Station Moffett Field, Santa Clara County, California. If you have questions regarding these comments, please feel free to contact me at (415) 947-4117.

Sincerely,

A handwritten signature in black ink, appearing to read "Yvonne Fong".

Yvonne W. Fong  
Remedial Project Manager

Enclosure

cc: Elizabeth Wells, RWQCB  
Scott Gromko, Moffett  
Sandy Olliges, NASA  
Bob Moss, Moffett RAB Community Co-chair

## GENERAL COMMENT

1. The Navy has provided the figures and tables EPA previously requested in our March 14 and August 17, 2006 comment letters. The figures enhance the clarity of the report with regard to which polygons will be remediated. With some corrections and addition of explanatory material as discussed below, the Addendum is acceptable.
2. There are a number of instances (some identified below) where polygons with all or most of the COECs above criteria are not being removed while others with lower concentrations of COECs are being removed. The Navy should explain why this is the case since the public will likely question those decisions.

## SPECIFIC COMMENTS

### *TEXT OF THE ADDENDUM*

1. Section 1.5.2.3, "Other Upland Soil Sites" appears to have been revised to update and limit the discussion of other sites that were investigated for PCBs and found to not require additional investigation or remediation. The Addendum would be more comprehensive if this section continued to include information on all historical investigations and actions at these sites. Please include this information for these sites.

### *APPENDIX A*

1. Under the "Sample Identification No." column, some of the samples are recorded as "averaged." Please explain what "averaged" means in this context.
2. When comparing the concentrations of the COECs to the criteria, there are many instances where some of the COECs exceeding the criteria are not named as "Chemicals Driving Remediation." Please add an explanation to the table (perhaps as an introductory page) that explains why some are "drivers" and some are not.
3. Review of the lists of samples shows that there are many instances where there are gaps in the numerical sequences. For example, in the PCSS group, 7, 9, 11, 13, 17, 30, 48, 52, 59, 63, 64, 67, 81, 112, 117, 136 are missing. In the PDG series, 7 and 8 are missing. EMB 1 and 3 are missing. M-H004 is missing. Please add an explanation of why these samples are missing.
4. There are instances where one polygon, such as PCSS-101, is being removed for a single contaminant (lead) yet PCSS-100 with three COECs exceeding criteria remains. Please review to see this decision is correct. If it is, please add an explanation why this happens in a number of instances.
5. Please correct the coloring on PDG-10. It is colored as remaining on Figure A-3 but the table indicates it will be removed.

6. There are some samples (i.e. MH001) where it is stated in footnote a that "concentration is calculated from adjacent polygons." Please explain how this was done and why it was necessary either in the footnote or as part of the introductory material.
7. Please correct the coloring on RP-H008. It is colored as remaining but the table says it will be removed.
8. Please verify that RP-H011, SSRP-12 and SSWL-010 are on the figures. We could not locate them in our review.
9. Please verify that the polygon surrounding SSRP-006 is to remain. The DDT concentration is very high.
10. SSRP-024 also has high concentrations of contaminants and should probably be removed.
11. SSRP-031 is marked as remaining at Site 25 in the table. On Figure A-2 (lower middle part of the figure) it seems to be on a "remove" quad which is not labeled. Please check this and correct as appropriate.
12. SSRP-33 has high PCBs yet is not being removed (see Figure A3, upper right). Please review to see if this decision is appropriate or should be changed.