

**Response to Comments Submitted by Roberta Blank (U.S. EPA)  
on the Operable Unit 1 Draft RI Report for  
NAS Moffett Field, California**

**General Comments:**

1. Verification documentation detailing the presence of methylene chloride and acetone in blanks, including laboratory analytical data sheets with detection limits listed for each analyte and laboratory quality assurance/quality control documentation sheets, was not included in the Operable Unit 1- Draft Remedial Investigation Report because this type of documentation is not typically included in remedial investigation reports and would add volumes to the present report. Raw analytical data from Site 1 and Site 2 soil and water samples have been previously presented in the December 1988 Quarterly Report (IT, 1988) and/or the August 1989 Quarterly Report (IT, 1989). Also, previous NAS Moffett Field operable unit remedial investigation reports have not included this information. IT has attempted to thoroughly describe (Section 2.4) its data validation procedures rather than provide an unmanageable amount of documentation within the body of this report.
2. CRQLs for organics analysis on soils/sediments, as provided in the EPA Contract Laboratory Program, Statement of Work for Organics Analysis, are based on wet weight. The quantitation limits calculated by the laboratory for soil/sediment are calculated on a dry weight basis, as required by the contract, and will subsequently be higher. The CRQLs listed in Appendix B are the low soil/sediment CRQLs. The medium soil/sediment CRQLs for volatiles are 125 times the low soil/sediment CRQL; semivolatiles are 60 times the low soil/sediment CRQL; and pesticide/PCBs are 15 times the low soil/sediment CRQL. Additionally, CRQLs for both water and soil/sediments are highly matrix dependent and are provided as guidance with the acknowledgement within the statement of work that they may not always be achievable. IT believes that the reported detection limits are consistent with the guidance and that the interpretation of the data in determining the nature and extent of contamination is appropriate.
3. The burn pits were identified during the Initial Assessment Study. Information on the existence and approximate location of the pits was based on interviews with base personnel. The figures in the RI Report show the reported locations of the burn pits.

IT and the Navy were unable to confirm the existence or location of the burn pits through review of aerial photographs or during field reconnaissance for the RI field work. It is, therefore, unknown if the pits actually exist.

4. The Navy has not attempted to downplay or be inattentive to possible metals contamination in the unsaturated soils. However, based on historical review, previous reports, and current practice at NAS Moffett Field, there are no known sources for metals contamination (i.e., plating operations, manufacturing). Inorganic contamination is reviewed in the nature and extent discussion of the RI and is evaluated in the baseline risk assessment (BRA).

### Specific Comments:

1. The trench and associated boundaries at Site 1 were primarily determined by historical photographs. The terrain conductivity measurements and vertical electrical soundings, because they distinguish between areas of fill and native soil, are unable to delineate the exact trench boundaries because the trench has been filled with the same material that occupies the rest of the landfill. However, these geophysical surveys do confirm the appropriate trench location as specified in the photographs. For example, the deepest areas of the fill material, as seen in the geoelectric profiles (Figure 2.3-4), correlate to the trench locations in the photograph.

The geophysical investigation study summaries have been removed from Section 2.1 and are now summarized in Section 2.3 only. The referenced contradiction does not exist in Section 2.3.

2. The highest detected concentration of acetone is 3,200 ppb (W01-09[F]). The text has been corrected.
3. As stated in Section 4.2, the highest detected concentration of arsenic in leachate samples from Site 1 was 43 ppb. The referenced elevated quantification limits are a result of circumstances previously noted in General Comment Response #2. Arsenic was not detected at levels above background in the landfill material samples, making it unlikely that the source of the referenced detections in samples MOF-485, SED-04, and SED-05 is the landfill, or that any migration has occurred. As stated in Sections 4.5 and 5.5, elevated levels of metals in surface water and sediment samples is expected because these samples were collected adjacent to or within the salt evaporation ponds, and were subjected to the evaporation process. The Navy has not attempted to downplay the effect of any contaminant and arsenic is fully evaluated in the baseline risk assessment for this OU.
4. A total of 20 landfill material samples were collected at Site 2. Of these samples, only two had concentrations of arsenic above the background concentration at 5.6 ppm. W02-06(41) and W02-10(F) had concentrations of 39.6 ppm and 17.6 ppm, respectively. These data do not support the conclusion that the Site 2 landfill is a source of the arsenic concentrations found in the referenced surface water and sediment samples. The only detected arsenic concentration in a sediment sample occurred in SED-03 at a concentration of 8 ppm, which is above the Hetch-Hetchy background of 5.0 ppm but within the MV18 background range at 5.9 to 11 ppm. Of the two surface water samples, arsenic was detected in only the wet season sample and it is not expected to have originated from the landfill. The Navy has not attempted to downplay the effect of any contaminant and arsenic is fully evaluated in the baseline risk assessment for this OU.
5. During validation of CLP laboratory data, data are evaluated for the presence of contamination in laboratory and field QC blanks to delineate contamination from sources other than the sample matrix. The sample data result is compared to all associated blank results. If the sample concentration is less than five or ten times (depending on the compound) the amount of any blank concentration and if the original result was less than

the CRQL and qualified as nondetected (U), the result is raised to the CRQL. If the original sample result was originally greater than the CRQL, the detected concentration remains and the result is qualified as nondetected (U). The elevated methylene chloride "detection limit" does not indicate noncompliance with validation procedures. Rather, it indicates that the detected concentration was due to contamination either in the field or in the laboratory. Text on validation procedures for sample data with associated blank contamination is included in Section 2.4.

6. The referenced sentence has been deleted.
7. Agreed. The text has been corrected.