

**RESPONSES TO HAZWRAP COMMENTS (DATED FEBRUARY 3, 1993)
ON WEST SIDE GROUNDWATER SITE CHARACTERIZATION REPORT
NAS MOFFETT FIELD**

Specific Comments

Comment 1 All future correspondence will have the proper zip code.

Comment 2 The following text will replace the existing text of section 1.5 titled "Operable Unit Definition"

Operable Unit Definition

In December 1991, the U.S. EPA, the California Department of Toxic Substances Control, the California Regional Water Quality Board (CRWQCB), and Moffett Field formally agreed to the designation of six operable units (OU) at Moffett Field and an accelerated investigation and remediation schedule. The revised schedule was a modification to the Federal Facility Agreement schedule.

The OU designations organized the existing 19 IRP sites (Figure 1.5-1) into independent groups with different schedules. Each OU is scheduled to proceed through the RI/FS stages to a Record of Decision (ROD) that is specific to that OU. A station-wide FS and ROD will be prepared after completion of the OU RODs. Prior to the designation of OUs, the 19 IRP sites at Moffett Field were subject to the same schedule.

The objective of grouping the IRP sites into OUs was to expedite cleanup at the sites. By preparing a ROD for each OU, permanent cleanup can begin at OU sites before the station-wide ROD is issued. This approach allows sites to proceed through the RI/FS stages to the ROD and remediation stages "at their own pace." If additional work is required at any of the OUs, it would not impact the schedule of other OUs and could be implemented without waiting for investigation and reporting activities to be completed on the other OUs.

The IRP sites at Moffett Field were grouped into OUs based on physiographic setting. In addition to separating sites into different OUs, soil was separated from groundwater to reflect the status of the different investigations and to lessen the schedule impacts of any focused follow-up soil or groundwater investigations that might be required.

Because separate RI Reports, FS Reports, and RODs are required for each OU, the number of OUs was limited to six in order to minimize the administrative and reporting burden while still accomplishing the objective of expediting remediation.

The six OUs were defined as:

- OU1 - Sites 1 and 2 Soils
- OU2 - Sites 3 through 11, 13, 14, and 16 through 19 Soils
- OU3 - Sites 12 and 15 Soils
- OU4 - West Side Aquifers
- OU5 - East Side Aquifers
- OU6 - Wetland Areas.

Subsequent to this, the U. S. EPA determined that the west side aquifers (OU4) and the OU2 sites that overlie the regional groundwater plume or are within the regional study areas are addressed by the EPA in the 1989 ROD for the MEW Study Area. The EPA decided that the Navy is no longer required to submit the OU4 deliverables, including the RI/FS and the baseline risk assessment. However, the U. S. EPA requested that the information contained in the OU4 RI that is important to source identification be repackaged as a site characterization report (letter dated 10/21/92 U. S. EPA to WESTDIV). This repackaged report is identified as the "West Side Groundwater Site Characterization Report."

- Comment 3 The discussion of the Site 10 Runway Area has been changed as requested.
- Comment 4 The text has been revised in Sections 1.6.6 and 2.3 (Site 15) for consistency and correctness. A sump summary section including Sump 64 has been added to Section 1.6.6 and 2.3.
- Comment 5 The title of the document was incorrect. The word Memorandum has been added to the title of the referenced document.
- Comment 6 See comment response 4.
- Comment 7 This sentence has been deleted from the text.
- Comment 8 The words "Phase I" have been added to the text.
- Comment 9 The sentence has been reworded as requested.
- Comment 10 The words study and characterization have been capitalize as requested.

- Comment 11 The words Feasibility Study (FS) have been deleted from the text.
- Comment 12 The correct footnote has been added to Table 2.1-1
- Comment 13 The corrections to the footnote and table have been made as requested.
- Comment 14 The table note has been changed as requested.
- Comment 15 The units on Tables 4.2-3, 4.2-5 and 4.2-7 have been changed from mg/l and ug/l to ppm and ppb, respectively. All table units are now either ppm or ppb.
- Comment 16 The footnote "a" has been changed to a table note.
- Comment 17 The footnotes "a, b, and c" have been moved as requested. All acronyms are capitalized as requested.
- Comment 18 The units of feet have been added to Table 3.6-3.
- Comment 19 The units of feet have been added to Table 3.6-4.
- Comment 20 The units of ppb have been added to Tables 4.1.1 and 4.1-1a.
- Comment 21 The footnote call-out has been changed as requested.
- Comment 22 The units have been corrected and are changed to ppb for consistency.
- Comment 23 The estimated concentration on Figure 4.2-6 has been corrected to ug/l. What about footnote "a"?

**RESPONSES TO NAS MOFFETT FIELD DEPARTMENT OF PUBLIC WORKS,
ENVIRONMENTAL DIVISION COMMENTS (DATED FEBRUARY 3, 1993) FOR
WEST SIDE GROUNDWATER SITE CHARACTERIZATION REPORT
NAS MOFFETT FIELD**

Specific Comments

Comment 1 Table 5.2-5 has been corrected as requested.

Comment 2 Figure 3.5-2 has been added to the document and table of contents as requested.

Comment 3 Table 3.6-1a has been added to the document and table of contents as requested.

Comment 4 Table 4.1-1a has been added to the document and table of contents as requested.