

**Response to Comments Submitted by Elizabeth Adams (CRWQCB)
on the Operable Unit 1 Draft RI Report for
NAS Moffett Field, California**

General Comments:

1. The "new" Golf Course Landfill has been investigated as part of the Additional Sites Investigation and the results have been presented in a report of the same title. It is not practical at this point to include this data in either the OU1 or OU2 RI process. Additionally, the "new" Golf Course Landfill is not defined in either OU. A work plan for further investigation of the additional sites is planned and the sites will be carried through the RI/FS process separately.
2. The ESA investigative sampling and analytical results for Sites 1 and 2 are included on the opening page of Chapters 4.0 and 5.0, respectively. The ESA monitoring well and soil boring locations for Sites 1 and 2 are shown in Figures 2.3-10 and 2.3-11, respectively.
3. Referenced Figure 2.3-11 as well as Figure 2.3-10 have been revised to reflect the "W01-" and "W02-" nomenclature consistent with Figure 4.1-2 and the text.

Specific Comments:

1. Operation and use of the pistol range ceased in early 1991. Additional text has been provided to reference this date.
2. The referenced section on page 1-11 states that TCE was found in groundwater samples (not soil samples) in trace amounts (5.5 ppb average). Analytical data from the soils in this area produced concentrations typical of other clean material.
3. The Navy distribution list for the SWAT report was not located. A copy of the report will be delivered to the CRWQCB.
4. Since the Draft OU1 RI Report was submitted, the Draft Final Additional Sites Investigation Report has been issued. That version of the Additional Sites Investigation Report states that the New Golf Course Landfill would be addressed in the base-wide FS, rather than in the OU2 FS, if an FS is appropriate for the site. The OU1 RI Report has been revised to reflect the most recent version of the Additional Sites Investigation Report.

Aside from treatment of the New Golf Course Landfill in the Additional Sites Investigation Report, the site will be addressed in the base-wide RI report. The site is not addressed (except in Section 2.2) in the OU1 RI Report because it is not a part of OU1. As discussed in recent monthly project meetings between the Navy and regulatory agencies, any new sites that are not included in the defined OUs will be

treated as appropriate in the base-wide RI report. This approach allows appropriate evaluation of new sites without delaying the RI and FS reports at the existing OUs.

5. The referenced text is indicating the landfill location as estimated by IT in relation to the landfill location as indicated by ESA. The text is correct in stating the IT estimated boundary is northwest of the ESA estimated boundary. Additional text has been provided to further clarify.
6. The San Francisco forktail damsel fly has been included in the list of endangered, threatened, and rare species.
7. The comment refers to the introductory paragraph that states some contaminants are persistent at the sites, detected in several media during several sampling events, and other contaminants are less persistent, detected in a limited number of media and during a limited number of sampling events. The Navy agrees that these isolated pockets should not be downplayed because the contaminants are not persistent. All contaminants are discussed in the appropriate Nature and Extent of Contamination and Contaminant Fate and Transport sections, whether they are present in isolated pockets or are limited in their areal extent. In addition, these detected contaminants are evaluated in the baseline risk assessment.

This introductory paragraph was only stating generalities and was not intended to be a conclusion or summary statement. This paragraph will be edited to more adequately define "persistence" and "isolated pockets."

8. Agreed. The text has been revised.
9. Agreed. The text has been revised.
10. All laboratory analytical results are presented in the previous chapters, Nature and Extent of Contamination. The Contaminant Fate and Transport section is intended to indicate the persistence of contaminants and their fate and movement in the environment. The Navy agrees the definition of persistence is not clearly stated in the Fate and Transport Chapter, although contaminant persistence is used in the EPA RI/FS guidance document. The text will be revised to eliminate the ambiguity of "not persistent."

The Navy agrees that naphthalene was consistently detected in leachate samples collected from leachate well W02-10(F). However, naphthalene was not persistent at Site 2. The reader may be confusing the use of the words "persistent" and "consistent" as defined in the OU1 RI.

11. This sentence was in error and will be corrected to state that PCBs are more persistent at Site 1 than Site 2.
12. This paragraph is only referring to Site 1 and has been revised to note that. No clay interval is reported to be underlying the Site 2 fill material. It is the Navy's position

that there are sufficient data to "indicate" a consistent clay interval underlying Site 1. However, the Navy understands that it cannot "prove" that a consistent clay layer is underlying Site 1 and does not intend to imply that in the discussion.

13. The description of downward migration on page 7-21, paragraph 4 is provided in Section 3.6 in the last paragraph on page 3-13 and the first paragraph of page 3-14.
14. Future residential land use at Moffett is considered unlikely. However, because it is not out of the question, future residential development has been assumed on the station and as close to OU1 as is reasonable. Future land use on OU1 will remain restricted due to coastal zoning laws.
15. TDS results for the leachate wells at Sites 1 and 2 are summarized in Tables 4.2-2 and 5.2-2 and are included in Appendix C.
16. The Navy agrees that a significant change in the geochemical conditions within the landfill material could increase the potential of contaminants leaching from the landfills. During the evaluation of the fate and transport of contaminants detected at Sites 1 and 2, it was determined that the geochemical conditions within the landfills had not significantly changed.

Actual field and laboratory data were used to evaluate the fate and transport of contaminants at Sites 1 and 2 instead of a computer simulation model. This is the suggested method in EPA's "Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA." The actual field data represents approximately 15 to 20 years of contaminant migration and is therefore a more accurate evaluation of contaminant fate and transport than a computer simulation.

As part of the Baseline Risk Assessment, worst case conditions are assumed to evaluate the risk to human health and environment from Sites 1 and 2. The Baseline Risk Assessment determined that a feasibility study needs to be conducted. The remedial action(s) evaluated in the feasibility study will determine the fate of contaminants in the future.

17. Agreed. Figure 4.1-2 as well as Figure 5.1-1 have been revised/corrected.