



April 27, 1993

Mr. Stephen Chao / Ms. Camille Garibaldi
 Department of the Navy
 Western Division (WESTDIV)
 Naval Facilities Engineering Command
 900 Commodore Way
 San Bruno, California 94066-0720

CLEAN Contract Number N62474-88-D-5086
 Contract Task Order 0170

RE: Transmittal of Draft Naval Air Station (NAS) Moffett Field Operable Unit 1 (OU1)
 Feasibility Study (FS) Report, Proposed Plan, and Response to Comments on the OU1
 Technology Screening Report

Dear Stephen and Camille:

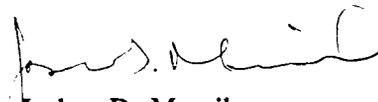
Enclosed are three copies of the draft OU1 FS report and the draft proposed plan for OU1. Also enclosed are PRC Environmental Management, Inc.'s (PRCs) responses to comments by the U.S. Environmental Protection Agency (EPA) on the NAS Moffett Field OU1 technology screening report prepared by Montgomery Watson (Montgomery) and PRC, dated October 30, 1992. The comments have been incorporated into the draft OU1 FS report. For ease of reference, the enclosure provides EPA comments followed by PRC responses.

If you have any questions, please call me at (303) 295-1101.

Sincerely,

PRC Environmental Management, Inc.


 Thomas J. Peters
 Project Engineer


 Joshua D. Marvil
 Project Manager

TJP/alc

cc: Michael Gill, EPA (1 copy)
 Fred Molloy, SAIC (1 copy)
 Elizabeth Adams, RWQCB (1 copy)
 Cyrus Shabahari, DTSC (1 copy)

LT Suzanne Openshaw, NASMF (letter only)
 Don Chuck, NASMF (2 copies)
 Joe LeClaire, Montgomery Watson (1 copy)
 Jeff Pile, IT (1 copy)
 PRC File

ADMIN RECORD

1715
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NAVAL AIR STATION MOFFETT FIELD OPERABLE UNIT 1

RESPONSE TO COMMENTS TECHNOLOGY SCREENING REPORT

1.0 INTRODUCTION

This report provides PRC Environmental Management Inc.'s (PRC's) responses to the U.S. Environmental Protection Agency (EPA) comments on the operable unit 1 (OU1) technology screening report (TSR) prepared by Montgomery Watson (Montgomery) and PRC, dated October 30, 1992. The TSR identified and screened preliminary remedial alternatives that address contamination at OU1. The comments were incorporated into the draft OU1 feasibility study (FS) prepared by PRC, dated May 3, 1993. OU1 contains two landfills. The purpose of the TSR and FS are to develop remedial alternatives that address contamination in landfill contents and hazards associated with landfill gas. Any ground water contaminated by the landfills will be addressed under OU5 activities. OU5 is defined as the west side aquifers, and OU1 is located within OU5 boundaries.

2.0 RESPONSE TO COMMENTS ON TECHNOLOGY SCREENING REPORT

Comments from Roberta Blank, EPA

GENERAL COMMENTS

Comment 1: Identification of an entire section of regulation, such as 40 Code of Federal Regulations (CFR) 264, as an applicable or relevant and appropriate requirement (ARAR) is not acceptable. Citations of specific regulatory requirements which are either applicable or appropriate and relevant to site-specific chemicals, site location, or site-specific actions are required.

Response: The ARAR section of the FS report has been revised to include specific citations, where appropriate.

Comment 2: The summary of the baseline risk assessment (BRA) provided in this report does not reflect the conclusions of the BRA submitted in the November 1992 draft remedial investigation (RI) report. Future revisions of the TSR should attempt to utilize the most current version of the BRA to minimize any further inconsistencies.

930421.02

RE:044-0170irfsu1/moffett/ou1/tar.rtc/4-14-93tjp

Response: *The TSR was prepared based on a working copy of the draft RI report. This was necessary because the RI report and TSR were prepared simultaneously to meet concurrent schedules. As a result, several inconsistencies between the TSR and subsequent RI reports were evident. The draft FS report has been prepared based on current information presented in the draft-final RI report, dated March 1993, to minimize inconsistencies.*

SPECIFIC COMMENTS

Comment 1: Section 1.2.5.1, Page 22, Paragraph 3: Comparing the locations of the landfill gas migration wells (LGMWs) shown on Figure 9 with the description in the text reveals an inconsistency. Figure 9 shows LGMW1-3 to be located due west of the landfill, while the text describes the wells as being located at the east, southeast, and southwest corners of the landfill. Please correct this discrepancy.

Response: *The text in the FS report has been revised to state that LGMWs are located west, southwest, and southeast from the landfill.*

Comment 2: Section 1.2.5.1, Page 24, Paragraph 1: The maximum detected concentration of ethylbenzene in the landfill material soils is 68 µg/kg in well W01-10(F) in the 7-8.5 foot below land surface sampling interval. Please correct the discrepancy.

Response: *The text in the FS report has been revised to correct this discrepancy.*

Comment 3: Section 1.2.5.1, Page 34, Paragraph 2: The statement that benzene, vinyl chloride, tetrachloroethene (PCE), and trichloroethene (TCE) were detected at maximum concentrations in the northeastern portion of the landfill is not correct. The maximum concentrations for PCE and TCE were in well LGCW1-5 which is located in the northwestern corner of the landfill. Please change the text to reflect this correction.

Response: *The text in the FS report has been revised to correct this discrepancy.*

Comment 4: Section 1.2.5.1, Page 35, Paragraph 1: The Aroclor-1242 and Aroclor-1260 detections in water samples collected within the landfill material are not listed in Table 3. Please verify that the numbers are correct and modify either the table or the text.

Response: *The text is correct; the tables in the FS report have been modified to correct this discrepancy.*

Comment 5: Sections 1.3.2 and 1.3.3, Pages 58 through 64: It is not clear from reviewing this section whether a full ARAR analysis has been completed. Some location-specific ARARs appear to have been missed, specifically, location within 61 meters of a fault displaced in Holocene time or location adjacent to a wildlife refuge. Please redo the analysis and list not only the ARARs that are ARARs for the site but also the ARARs that have been eliminated.

Response: The ARAR analysis has been revised as suggested to include ARARs that have been eliminated.

Comment 6: Section 1.3.1, Page 58: The statement "risk-based cleanup levels for soils have not been developed" implies that these levels will be developed in the future. Please be aware that when these levels are established, the technologies proposed in this document may need to be reviewed again for technological feasibility.

Response: The comment has been noted; however, cleanup levels developed for soils are not likely to be applicable or relevant and appropriate for most landfills.

Comment 7: Pages 59 and 61-62, Tables 14 and 15: Please correct the regulatory citations in these tables to match the citations provided in the "CERCLA Compliance with Other Laws Manual U.S. EPA 1988" and the "CERCLA Compliance with Other Laws Manual: Part II. Clean Air Act and Other Environmental Statutes and State Requirements, U.S. EPA 1989."

Response: Regulatory citations in the FS report are consistent with the EPA RI/FS guidance documents referenced in the FS report.

Comment 8: Section 1.4, Page 64, Paragraph 2: When and in what document will the soil gas inhalation and the landfill water ingestion pathways be quantitatively evaluated for the current potential recreational receptors?

Response: An initial screening level risk evaluation for soil gas inhalation was included in the OU1 RI appendix. This evaluation is summarized in the FS report. In addition, an Air Solid Waste Assessment Test (Air SWAT) report was submitted in August 1992 to the Bay Area Air Quality Management District (BAAQMD) for review and recommendations. The BAAQMD has not yet issued a response. The landfill water ingestion pathways will be quantitatively evaluated for current potential recreational receptors in OU5 RI/FS documents.

Comment 9: Section 1.4, Page 64, Paragraph 3: An additional complete exposure pathway for workers is the ingestion and dermal contact with leachate contaminated water. This pathway was identified in the BRA for Operable Unit 1 (OU1).

Response: In the draft-final OUI RI report, ingestion and dermal contact with leachate was not identified as a complete exposure pathway because leachate is not used to supply either drinking or industrial water. Ingestion and dermal contact with leachate-contaminated ground water is a complete exposure pathway and is evaluated in the OU5 RI BRA.

Comment 10: Section 1.4, Pages 66 and 67: The estimated total excess cancer risks for Site 1 are inconsistent with Table 7.6-1 of the RI Report, Summary of Potential Carcinogenic and Noncarcinogenic Health Risks. For example the current worker receptor is listed as 2×10^{-4} to 5×10^{-4} but should be 2×10^{-7} to 4×10^{-7} ; the future residential child receptor is listed as 3×10^{-6} to 9×10^{-6} but should be 4×10^{-6} to 1×10^{-5} ; and the future residential adult receptor is listed as 3×10^{-6} to 7×10^{-6} but should be 3×10^{-6} to 9×10^{-6} .

Response: The values listed have been revised. The FS report has been prepared based on data presented in the draft-final OUI RI dated March 1993. See the response to general comment 2.

Comment 11: Section 1.4, Page 67: The estimated total excess cancer risks for Site 2 are also inconsistent with Table 7.6-1 of the RI Report Summary of Potential Carcinogenic and Noncarcinogenic Health Risks. For example the current child recreational receptor is listed as 3×10^{-5} to 5×10^{-5} but should be 4×10^{-6} to 8×10^{-6} ; the current adult recreational user is listed as 3×10^{-5} to 6×10^{-5} but should be 6×10^{-6} to 1×10^{-5} ; the current worker receptor is listed as 2×10^{-3} to 3×10^{-3} but should be 3×10^{-7} to 6×10^{-7} ; and the future residential adult receptor is listed as 5×10^{-6} to 1×10^{-5} but should be 6×10^{-6} to 1×10^{-5} .

Response: The values listed have been revised. The FS report has been prepared based on data presented in the draft-final OUI RI report dated March 1993. See the response to general comment 2.

Comment 12: Section 1.4, Page 67: The estimated total hazard index values for Site 1 are inconsistent with Table 7.6-1 of the RI report. For example the current worker is listed as 0.8 to 0.9 but should be 6.5×10^{-5} to 8×10^{-5} and the future residential adult is listed as 0.0011 to 0.0013 but should be 0.022 to 0.035.

Response: The values listed have been revised. The FS report has been prepared based on data presented in the draft-final OUI RI report dated March 1993. See the response to general comment 2.

Comment 13: Section 1.4, Page 68: The estimated total hazard index values for Site 2 are also inconsistent with Table 7.6-1 of the RI report. For example the current child recreational user is listed as 3.9×10^{-6} to 6.5×10^{-6} but should be 5.4×10^{-3} to 6.9×10^{-3} and the current worker is listed as 5.4 to 6.9 but should be

1.1x10⁻⁴ to 1.3x10⁻⁴.

Response: **The values listed have been revised. The FS report has been prepared based on data presented in the draft-final OUI RI report dated March 1993. See the response to general comment 2.**

Comment 14: Section 1.4, Page 68, Paragraph 1: The statement that the majority of the noncancer hazard is due to potential exposure to polychlorinated biphenyls (PCBs) in soil is incorrect. There are no current EPA or Cal EPA approved noncarcinogenic toxicity data to evaluate the noncarcinogenic exposure to PCBs in the soil.

Response: **This incorrect statement is not included in the FS report.**

N00296.001715
MOFFETT FIELD
SSIC NO. 5090.3

ENCLOSURE 1

DRAFT FEASIBILITY STUDY REPORT

DATED 27 APRIL 1993

IS FILED AS ADMINISTRATIVE RECORD NO.
N00296.001713

ENCLOSURE 2

DRAFT FINAL
PROPOSED PLAN FOR
OPERABLE UNIT 1

THIS ENCLOSURE WAS NOT SUBMITTED TO THE
ADMINISTRATIVE RECORD FILE.

QUESTIONS MAY BE DIRECTED TO:

**DIANE C. SILVA, RECORDS MANAGER
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132**

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E-MAIL: diane.silva@navy.mil**