

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737



December 3, 1992

Mr. Stephen Chao
Department of the Navy
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Building 101
San Bruno, California 94066-0720

Dear Mr. Chao:

MOFFETT FIELD REVISED OU-6 WORK PLAN

The Department of Toxic Substances Control (Department) has reviewed the above report. Although significant improvement has been achieved in incorporating the agencies' initial comments, there are a few remaining issues which need further clarification. The attached comments are forwarded to you for your consideration.

Should you have any questions, please call me at (510) 540-3821 or Laura Valoppi at (916) 255-2052.

Sincerely,

A handwritten signature in black ink that reads "Cyrus Shabahari".

Cyrus Shabahari
Waste Management Engineer
Site Mitigation Branch

Enclosure

cc: See next page

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Mr. Stephen Chao
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cc: Roberta Blank
U.S. Environmental Protection
Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Elizabeth Adams
Regional Water Quality Control
Board
2101 Webster Street, Suite 500
Oakland, California 94612

Laura Valoppi
Department of Toxic Substances Control
Office of the Science Advisor
P.O. Box 806
Sacramento, California 95812-0806

Denise Klimas
c/o U.S. Environmental Protection
Agency
75 Hawthorne Street
San Francisco, California 94105

M e m o r a n d u m

To : Cyrus Shabahari
Site Mitigation, Region 2
700 Heinz Avenue, Building F,
Second Floor
Berkeley, California 94710

Date: November 18, 1992

From : Office of the Science Advisor
400 P Street, Fourth Floor
P. O. Box 806
Sacramento, California 95812-0806
Subject: (916) 255-2052

Moffett Field Naval Air Station, Draft Final Phase I Site-Wide Ecological Assessment Work Plan, PCA = 14650, Site = 200068-43

The Human and Ecological Risk Section (HERS) was requested by Region 2, Site Mitigation Branch, on November 6, 1992, to review and provide verbal comments on the document titled, "Naval Air Station, Moffett Field California, Draft Final Phase I Site-Wide Ecological Assessment Work Plan", prepared by PRC Environmental Management, Inc. and James M. Montgomery, Inc., and dated November 3, 1992.

This workplan is considerably improved over the previous submittal. The following is a summary of my major comments on this workplan, which we discussed in a telephone conversation on November 17, 1992.

1. It was agreed in the agency meeting of August 31, 1992 that recommendations for sampling and field investigation was to be part of Phase II. The reason for this is that a more comprehensive report on habitat, and the nature and extent of contamination in relation to important habitat, must first be compiled to provide a framework for a sampling plan. Therefore Sections 4.4, 6.3, 6.6, 7.0, 8.0, 10.0, 11.0, and 12.0 should be omitted from Phase I.

2. Areas on the base, or off-site, which received stormwater runoff from the Building 191 Lift Station may need further characterization in terms of habitat, as well as extent of contamination. For example, the workplan states Guadalupe Slough received stormwater runoff diverted through the lift station. At the mouth of Guadalupe Slough, clapper rails were observed (Orton-Palmer and Takekawa, 1992), and the presence of the saltmarsh harvest mouse in the slough cannot be ruled out, since trapping surveys in that slough are limited (Haas, 1991). Potential transport of stormwater runoff via Jagel and Devil's sloughs should also be assessed in the Phase I report.



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3. The significance of the hydrogeology described on pages 6 and 7, in relation to the potential discharge of contaminated groundwater to surface waters, now or in the future, should be described in the Phase I report. In addition, the potential for burrowing animals (e.g., burrowing owls) to come into contact with contaminated soil vapors emitted from contaminated groundwater should also be assessed.

4. Section 4.3 contains a detailed procedure for formal delineation of wetlands per Army Corps of Engineers (ACE) protocol. What is the purpose of such an intensive effort? Is the Naval Air Station proposing to dredge or fill the wetlands on the base? The state may consider wetland habitat, such as mudflats, as important habitat, even though such habitat may not be considered wetland under the ACE protocol.

5. Page 16 states that the location of habitat and nesting sites for state and federally-listed threatened and endangered species will be mapped. In addition, the habitat and nesting areas of California Species of Special Concern should also be mapped.

Laura Valoppi

Laura M. Valoppi, M.S.
Associate Toxicologist
Human and Ecological Risk
Section

Reviewed by: Michael J. Wade, Ph.D., DABT *MJW*
Senior Toxicologist
Human and Ecological Risk Section

cc: Cheng Liao, Ph.D., DABT
Region 2

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REFERENCES

Haas, J. July 26, 1991. Memorandum from Jim Haas, to 189,
Subject: Results of Preliminary Saltmarsh Harvest Mouse
Survey.

Orton-Palmer, A. and J.E. Takekawa. August, 1992. Breeding
Census for the California Clapper Rail (*Rallus longirostris
obsoletus*) at Naval Air Station Moffett Field and Guadalupe
Slough, 1992. Draft prepared by the U.S. Fish and Wildlife
Service, San Francisco Bay National Wildlife Refuge.