



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

December 16, 1992

Stephen Chao
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Bldg. 101
San Bruno, CA 94066-0720

Dear Mr. Chao:

The U.S. Environmental Protection Agency has reviewed the Draft Operable Unit 1 Technology Screening Report for NAS Moffett Field. Comments prepared by our representative, SAIC, Inc., are enclosed. Please call me if you have any questions at (415) 744-2385.

Sincerely,

A handwritten signature in cursive script that reads "Roberta Blank".

Roberta Blank
Remedial Project Manager

cc: Elizabeth Adams, RWQCB
Cyrus Shabahari, DTSC

1851



Science Applications International Corporation
An Employee-Owned Company
Technology Services Company

November 25, 1992

DCN: TZ4-C09015-RN-M15425

Ms. Roberta Blank (H-9-2)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Ref: EPA Contract No. 68-W9-0008; Work Assignment No. C09015
SAIC/TSC Project No. 06-0794-03-0630
Draft Operable Unit 1 (OU1), Technology Screening Report
NAS Moffett Field, Mountain View, California

Dear Roberta:

SAIC/TSC has completed its technical review of the referenced document. The review was performed by Garrett Michael Turner, P.E., SAIC/TSC Environmental Engineer and Sophia M. Serda, Ph.D., SAIC/TSC Environmental Toxicologist. As you requested, only items that will make a major impact upon the selected remedy for the site were commented upon.

If you have any questions, please call me at (415) 399-0140.

Sincerely,

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
Technology Services Company

A handwritten signature in cursive script that reads "Fred Molloy". The signature is written in black ink and is positioned above the typed name and title.

Fred Molloy
Work Assignment Manager

cc: Garrett Michael Turner
Sophia M. Serda

TECHNICAL REVIEW OF
DRAFT OPERABLE UNIT 1
TECHNOLOGY SCREENING REPORT
NAVAL AIR STATION, MOFFETT FIELD
MOUNTAIN VIEW, CALIFORNIA

NOVEMBER 25, 1992

Submitted to:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105

Submitted by:

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
TECHNOLOGY SERVICES COMPANY
20 CALIFORNIA STREET, SUITE 400
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EPA CONTRACT NO. 68-W9-0008
EPA WORK ASSIGNMENT NO. C09015
SAIC/TSC PROJECT NO. 06-0794-03-0630

TECHNICAL REVIEW OF
DRAFT OPERABLE UNIT 1
TECHNOLOGY SCREENING REPORT
NAVAL AIR STATION, MOFFETT FIELD
MOUNTAIN VIEW, CALIFORNIA

November 25, 1992

GENERAL COMMENTS

1. Identification of an entire section of a regulation, such as 40 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.
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 Technology Screening Report should attempt to utilize the most current version of the BRA to minimize any further inconsistencies.

SPECIFIC COMMENTS

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.

2. Section 1.2.5.1, Page 24, Paragraph 1

The maximum detected concentration of ethylbenzene in the landfill material soils is 68 $\mu\text{g}/\text{kg}$ in well W01-10(F) in the 7-8.5 foot below land surface sampling interval. Please correct the discrepancy.

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.

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.

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 applicable or relevant and appropriate requirements for the site but also the ARARs that have been eliminated.

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 need to be reviewed again for technology feasibility.

7. Pages 59 and 61 through 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."

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?

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).

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 2E-04 to 5E-04 but should be 2E-7 to 4E-7; the future residential child receptor is listed as 3E-6 to 9E-6 but should be 4E-6 to 1 E-5; and the future residential adult receptor is listed as 3E-6 to 7E-6 but should be 3E-6 to 9E-6.

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 $3E-05$ to $5E-05$ but should be $4E-6$ to $8E-6$; the current adult recreational user is listed as $3E-5$ to $6E-5$ but should be $6E-6$ to $1E-5$; the current worker receptor is listed as $2E-3$ to $3E-3$ but should be $3E-7$ to $6E-7$; and the future residential adult receptor is listed as $5E-6$ to $1E-5$ but should be $6E-6$ to $1E-5$.

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 $6.5E-05$ to $8E-05$ and the future residential adult is listed as 0.0011 to 0.0013 but should be 0.022 to 0.035.

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 $3.9E-6$ to $6.5 E-6$ but should be $5.4E-3$ to $6.9E-3$ and the current worker is listed as 5.4 to 6.9 but should be $1.1E-4$ to $1.3E-4$.

14. Section 1.4, Page 68, Paragraph 1

The statement that the majority of the noncancer hazard is due to potential exposure to 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.