



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

MAR 16 1993

Stephen Chao
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Bldg. 101
San Bruno, CA 04066-0720

Dear Mr. Chao:

On March 2, 1993 we submitted our comments to you on the Draft Final Baseline Risk Assessment for Operable Unit 2 at NAS Moffett Field. Subsequently, we held a phone conference call on March 11 with you and your consultants to discuss resolution of the comments. In addition, our consultant, Dr. Sophia Serda os SAIC, Inc., had a phone conference with Cindy Hasson of IT Corporation regarding somme additional OU 2 risk assessment comments as outlined in the enclosed letter. While these comments were not addressed in our March 2, 1993 letter, we felt the quality of the risk assessment document would be improved by addressing them. Please let me know if you have any questions. I can be reached at (415) 744-2385.

Sincerely,

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

Roberta Blank
Remedial Project Manager

cc: Cyrus Shabahari, DTSC
Elizabeth Adams, RWQCB

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Science Applications International Corporation
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Technology Services Company

March 11, 1993

DCN: TZ4-C09015-EP-M16478

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; EPA Work Assignment No. C09015
SAIC/TSC Project No. 06-0794-03-0630
Documentation of Telephone Conversation with Cindy Hasson Regarding
Additional Comments on the Baseline Risk Assessment
Draft Final Remedial Investigation Report - Operable Unit 2
NAS Moffett Field, Mountain View, California

Dear Roberta:

Sophia discussed the following issues with Cindy Hasson of IT on March 11, 1993:

1. Tables 20.3-15 through Tables 20.3-110

The calculation for each exposure scenario intake factor must be presented. This information can be easily incorporated in the text of the BRA. All chemicals of concern (COCs) for each site should be presented for each pathway. This will allow immediate understanding of how each COC contributes to the hazard or risk for each individual pathway at the site. Additionally, the intake factor units for soil ingestion are incorrectly referred to as day-1 and should be kg(soil)/kg/day.

Explain how concentrations of volatile organic compounds (VOCs) in air were calculated. Additionally, how were COCs determined to be VOCs?

2. Table 20.4-1: Summary of Cancer Slope Factors

This table is incomplete! Where are the carcinogenicity data for tetrachlorethene and N-dinitrophenylamine? Also, all COCs for OU2 should be listed in this table.

3. Table 20.4-2: Summary of Noncarcinogenic Reference Doses

This table still contains numerous errors, which were identified in

Ms. Roberta Blank
March 11, 1993
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previous comments from the DTSC, RWQCB, EPA, and SAIC/TSC. Additionally, all COCs for OU2 should be listed in this table.

4. Page 20-53

It is not acceptable to only cite the Jones and Owen paper and not present the rationale used for identifying which chemicals the oral absorption factors would be applied to for purposes of calculating dermal RfDs.

5. DTSC's lead model used in the BRA was only briefly evaluated but appears to be applied correctly. Final evaluation of DTSC's lead model should defer to DTSC's expertise on this model.
6. Methylene chloride was included as a COC for Sites 10, 11, and 19 in the Draft Final BRA for OU2 but now is not listed as a COC for these sites. This deletion should be explained.
7. For several of the sites (4, 5, 6, 7, and 13), JP-5 is identified as a COC. However, an evaluation of individual components was not presented.

If you have any questions regarding these comments, please contact myself or Dr. Sophia Serda at (415) 399-0140.

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
Technology Services Company

A handwritten signature in cursive script that reads "Fred Molloy".

Fred Molloy
Work Assignment Manager

FM/ks