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Ser 09ER5HC/4250
June 8, 1994

US Environmental Protection Agency
Office of Superfund Programs
Attn: Mr. Michael D. Gill
75 Hawthorne Street (H-9-2)
San Francisco, CA 94105-3901

Subj: NAVAL AIR STATION MOFFETT FIELD DRAFT FINAL PHASE I SITE-WIDE ECOLOGICAL ASSESSMENT (SWEA) REPORT

Dear Mr. Gill:

Per our discussion during the agency meeting of June 7, 1994 and pursuant to section 27 of the Federal Facility Agreement (FFA), an extension is hereby requested for the submittal date of draft final phase I SWEA report and the final phase I SWEA investigation report.

The Navy has reviewed the suggested selection criteria provided by the agencies in the letter dated May 6, 1994. It is the Navy's position that the phase I SWEA was conducted in accordance with the agency-accepted final phase I SWEA work plan (PRC and JMM 1993) and was unfortunate that some of the Agencies' comments for the draft final phase I SWEA could not have been incorporated in the final phase I SWEA work plan. The attached clarification is provided to verify our understanding of the Agencies' requirements. Furthermore, the Navy will provide the following in the draft final phase I SWEA:

i. apply the agency criteria and present the results of the re-selection of chemicals in an appendix the the draft final phase I SWEA.

ii. provide within the executive summary a summary of tables of COPCs based on application of the agencies criteria and references to the appendix

iii. and provide within the executive summary, an explanation of the re-selection of chemicals.

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In order for the Navy to implement the above revisions, a new deadline for the draft final phase I SWEA investigation report of July 15, 1994 is required. All efforts will be taken to deliver the aforementioned document as early as possible to accelerate the program. In addition, the draft phase II SWEA schedule will not be affected by the proposed changes in the draft final phase I SWEA investigation report submittal dates.

If there are any questions concerning this submittal or you need additional information, please contact me at (415) 244-2563.

Sincerely,

Stephen Chao
Brac Environmental Coordinator

Copy to:
Department of Toxic Substance Control (Attn: Mr. Joseph Chou)
Regional Water Quality Control Board (Attn: Mr. Ron Gervason)
NAS Moffett Field (Attn: LT. Susanne Openshaw)
NASA Ames Research Center (Attn: Ms. Sandy Olliges)
MHB Technical Associates (Attn: Mr. Peter Strauss)
PRC Environmental Management, Inc. (Attn: Michael Young)

Blind copy to:
09ER5, 09ER5ST, 09ER5DC, 09ER5HC
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ATTACHMENT

Navy Clarification to Agency Criteria

The regulatory agencies provided detailed criteria for selection of chemicals of potential concern (COPCs) during the Phase I SWEA (letter dated May 6, 1994). The following clarification applies to criteria presented in the letter. All page number and paragraph references refer to the May 6, 1994 letter.

Organics in the Landfills (p.2, paragraph 1):

The agencies noted that common laboratory contaminants may be screened with documentation according to Part A of EPA RAGS guidance. In general, the Navy objects to the application of human health guidance to ecological assessments. The common laboratory contaminants will be evaluated using the National Functional Guidelines for Organic Data Review (EPA 1991), a more recent reference than that provided in RAGS Volume 1 (Part A). Documentation of the application of this approach is recorded during the data validation process.

The Menzie paper presents data on PAH concentrations in various environmental media. While the thrust of the paper is an exploration of human exposure to carcinogenic PAHs, ecological receptors may be exposed to these same PAHs. The concentration of PAHs in soil is the same regardless of the receptor. Moreover, the fact that the data presented in the paper are not site-specific should not automatically discount review of these data in the context of the site. For example, background data presented by IT Corp. and accepted by the agencies were from non site-specific sources. Data presented in the Menzie paper indicate that ambient concentrations of PAHs are commonly present in soil and sediment. Although this information should be considered in interpreting data from NAS Moffett Field, the Navy agrees to include PAHs detected in the landfills rather than continue to dispute the issue.

Organics in the Non Landfill Upland Areas (p.2, paragraph 2):

See clarification regarding common laboratory contaminants presented above.

The agencies have not provided supporting rationale for the change from 10 percent to 5 percent. This change has no basis in ecological receptor exposure assessment. The application of RAGS Volume 1 (Part A) to ecological assessments is inappropriate. The Navy believes that the 10 percent frequency limit is appropriate for the following reasons:

- For those chemicals not selected as COPCs based on the 10 percent frequency limit, the spatial distribution of detections did not show a pattern, but were apparently randomly distributed. This results in lower exposure to potential receptors than if the detected concentrations were clustered in a particular geographic area.

- The purpose of the Phase I SWEA was to identify the potential for risks to ecological receptors by developing a conceptual site model. The 10 percent frequency limit was selected based on best professional judgment of the number of detected concentrations scattered within each of the habitat types (wetland, ruderal upland landfills, non-landfill uplands) that could potentially result in harm to a receptor population. This judgment was also based on the understanding that large-scale remediation for scattered low-level chemical concentrations detected at

less than 10 percent frequency would likely result in extensive disruption that could render the site unsuitable for receptor species.

While the Navy believes that the 10 percent frequency limit is appropriate and that no rationale has been provided for the change to a 5 percent frequency limit, the Navy agrees to include change to a 5 percent frequency limit rather than continue to dispute the issue.

Organics in Groundwater and Surface Water (p.2, paragraph 4):

The Navy will use all criteria referenced in the December 1991 EPA Eco Update. These criteria include magnitude and frequency of detections, bioavailability, bioaccumulative/bioconcentration potential, toxicity, and persistence of the compounds.

Organics in Sediment (p. 3, paragraph 1):

The application of RAGS Volume 1 (Part A) to ecological assessments is inappropriate. The common laboratory contaminants will be evaluated using the National Functional Guidelines for Organic Data Review (EPA 1991), a more recent reference than that provided in RAGS Volume 1 (Part A). Documentation of the application of this approach is recorded during the data validation process.

Organics in Sediment (p. 3, paragraph 2):

The agencies noted that they require a verification step if no risk is shown during evaluation of PAHs as a mixture. This verification step may include bioassays, additional chemical analysis, or a more refined literature survey specific to the issue.