



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

August 9, 1994

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

Re: Responses to Comments on Draft Site-Wide Ecological Assessment, dated July 18, 1994

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document. As agreed to by all parties to the Federal Facility Agreement (FFA), included in the document were responses to comments, an updated executive summary and tables in an agency format that show screening for chemicals of potential concern. We appreciated the opportunity to discuss various issues in our conference call of August 3, 1994, but a few of these issues remain unresolved. The comment of most concern centers around the lack of justifiable information presented when using toxicity to screen a chemical of potential concern. An alternative to providing satisfactory reference justification for eliminating chemicals based on toxicity would be to provide justification by way of a biological approach (e.g. bioassays, more sampling, etc.). This will provide a valid impact assessment of the chemicals at the site. Then the steps of risk characterization and risk management can be performed in Phase II of the SWEA.

As specified in the FFA (§9.9), the period between the draft final and the final submittal of a primary document is considered an informal dispute period. If the regulatory agencies have issues that need to be addressed, the document cannot be approved as final. Several comments follow that need to be addressed. If these comments are addressed satisfactorily, then the document should be finalized by August 18, 1994. If there are still disagreements, then we should meet to discuss proceeding with the formal dispute process. Please call Bobbye Smith at 415-744-2366 or Clarence Callahan at 744-2314 if you have any questions, as I will out of the office until approximately September 6, 1994.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Gill".

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

cc: C. Joseph Chou (DTSC)
Ken Eichstaedt (URS)
Ron Gervason (RWQCB)
Sandy Olliges (NASA)
Peter Strauss (MHB)
Mike Young (PRC) (Fax)

**Comments on Moffett Field Draft Final Phase I Site-Wide Ecological Assessment,
dated July 18, 1994**

RESPONSE TO COMMENTS

1. Response to EPA Specific Comment # 31 (M. Gill). The response to this comment regarding the statement that plants metabolize VOCs and petroleum products was inadequate. Please provide the page numbers in the citation (Alexander et al.) and possibly provide copies of the pages for our files because of uniqueness of this response.
2. Response to EPA Specific Comments 40, 41 (M. Gill). This document should have included the actual responses, not just a statement saying "the text will be revised...".
3. Response to EPA Specific Comment 45 (M. Gill). Please be sure to include this response in the text.

EXECUTIVE SUMMARY

1. The Executive Summary was modified to include the criteria for screening chemicals of potential concern. These criteria were developed through numerous meetings and communicated to the Navy in the May 6, 1994 letter included in this document. The June 6, 1994 letter responding to the Navy may have provided some clarification, but should not have changed any of the criteria. There are some differences between those criteria sent to the Navy and the table in the executive summary. These discrepancies are listed here and need to be corrected.

a. Upland Terrestrial Soil/Organics

Landfills

- ALL pesticides / PCBs are to be retained as COCs unless more justification / documentation can be provided when using toxicity as a screening criteria.
- ALL organic compounds, including PAHs are to be retained as COCs unless more justification / documentation can be provided when using toxicity as a screening criteria.

Non-Landfills

- Include the potential for receptor exposure based on the depth of the sample location as a criteria.
- Need clarification on how the site conceptual model will help to identify "hot spots".
- The third bullet "chemicals based on bioavailability,..." was not agreed upon. Please remove it.

b. Groundwater and Surface Water/Organics

Please remove "persistence of compound" from bullet 4.

c. Sediment/Organics

Please explain why the detection limits for PAHs will be adjusted if frequency of detections is less than 5%. If there is a question regarding detection limits of PAHs, it is up to the Navy to provide a different type of analysis for these areas to achieve lower detection limits. This appears to be the same issue that we have discussed and are working to resolve at OU6. It is also important to consider the order in which the screening criteria are used in this case, as is communicated in the May 6, 1994 letter. This provides the best way to evaluate total impact to receptors.

Please include the common lab contaminant screening criteria as appears in the May 6, 1994 letter.

CHEMICALS OF CONCERN TABLES

Provided here are some general comments regarding Tables C-1 through C-6.

1. Reference documentation is needed for more justification where toxicity data is used for eliminating COPCs, possibly in the footnotes. If one looks at the tables, certain contaminants appear to be a concern, but are screened because of toxicity, for example:

Table C-1	Uplands	JP-5	6,760 ppm
	Wetlands	Motor Oil	130,000 ppm

As mentioned in the cover letter, if you cannot or do not want to provide satisfactory reference justification for eliminating chemicals based on toxicity, we would encourage you to provide justification by way of a biological approach (e.g. bioassays, more sampling, etc.). This will allow you to obtain the response of organisms to the toxicity actually present in the ecological areas at the site. The steps of risk characterization and risk management can then be performed in Phase II of the SWEA. Has the Navy considered using the U.S. Fish and Wildlife Service Vegetation Management in the Coastal Plain/Piedmont (Final Environmental Impact Statement) of January 1989 as a reference for toxicity? Section 6 contains a wildlife and aquatic species hazard analysis that may be useful as one additional reference.

2. At least two values in Table C-2 (for calcium) have mistyped commas in the entered values. Please reconcile this problem. Other tables (C-3, C-4, C-5, C-6) do not use commas at all. Was a different database used? Is there a potential for incorrect data here?
3. Many tables (C-3, C-4 and C-6) have entries where decimal points are obviously missing. This can easily lead to misinterpretation of the data.
4. Occasional entries have mean values greater than maximum detected concentration values.

In discussions with Montgomery Watson, the reason for this occurrence was because non-detected chemicals were also included in the calculation of the mean. More explanation needs to appear in the footnotes of the table.

5. Phosphorus and nitrogen never appear in the tables as detected chemicals. In the conference call, Montgomery Watson stated that these chemicals were included in the suite of analyzed chemicals and will be included in the final document. This is important because of the potential for these chemicals to impact the receptors. The agencies need to know about all potential impacts.