

DEPARTMENT OF TOXIC SUBSTANCES CONTROLREGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

August 19, 1994

Commander
Western Division
Naval Facilities Engineering Command
Attn: Mr. Stephen Chao, Project Manager
900 Commodore Drive, Bldg. 101
San Bruno, California 94066-2402

Dear Mr. Chao:

DRAFT OPERABLE UNIT 2-EAST RECORD OF DECISION(ROD), NAVAL AIR STATION MOFFETT FIELD

The California Environmental Protection Agency (Cal/ EPA) has received the subject document. Comments have been prepared by the Department of Toxic Substances Control (DTSC) and San Francisco Regional Water Quality Control Board (RWQCB). If you have questions, please contact me at (510) 540-3830.

1. Page 2, Declaration Statement

Please note that Mr. Anthony J. Landis, Chief of Operations, Office of Military Facilities, Department of Toxic Substances Control, California Environmental Protection Agency is the State representative to sign the ROD.

2. Page 3, first paragraph, last sentence

The Navy should clarify sentence as follows: "With the exceptions of several small ponds maintained on the NAS Moffett Field golf course as water hazards, stormwater drainage ditches, and standing water after floodings or rainfall, and the wetlands described above, no other surface water features are present at NAS Moffett Field."

3. Page 3, last paragraph

The Navy should clarify that the A and B aquifers are not presently used at NAS Moffett Field. It is possible that water from these aquifers may be used elsewhere (i.e., private wells) in Santa Clara Valley. In addition, the Navy must clarify that the upper aquifers are considered potential drinking water sources according to the San Francisco Bay Basin Plan and because they meet the criteria

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as set forth in the State Water Resources Control Board Resolution 88-63 (as described on page 4, second paragraph of the document). The brackish water were only found in the northern part of the base adjacent to the stormwater retention pond and the Cargill evaporation pond.

4. Page 4, second paragraph, first sentence:

The Navy must modify the sentence as follows: "Current and potential beneficial uses applicable to main groundwater basins in the San Francisco Bay region are . . ."

5. Page 6, last paragraph

Site 9, 14 and 19 (Tank 2, 43 and 53) should be included in OU2-West; site 19 (Tank 14) is part of OU2-East.

6. Page 11, Scope and Role of Response Action

The schedule of Station-Wide ROD should be included in the table.

7. Table 2

Hazard Quotient(HQ) is the ratio of single substance exposure level. Hazard Index(HI), the sum of more than one hazard quotient for multiple substances and multiple pathways, should be used to represent total noncarcinogen risks.

8. Table 2

Beryllium should not be removed in calculating ILCRs and HIs. It should be included as any other inorganics found at Moffett Field.

Sincerely,



C. Joseph Chou
Remedial Project Manager
Base Closure Unit
Office of Military Facility

cc: See next page

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cc: Mr. Ron Gervason
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Mr. Michael D. Gill
U.S. Environmental Protection Agency
Region IX, Mail Stop H-9-2
75 Hawthorne Street
San Francisco, California 94105