

MOFFETT FEDERAL AIRFIELD
RESPONSE TO COMMENTS ON
INSTALLATION RESTORATION PROGRAM
OPERABLE UNIT 2 - EAST RECORD OF DECISION

SEPTEMBER 12, 1994

This report presents point-by-point responses to regulatory agency comments on the Draft Operable Unit 2 - East (OU2-East) Record of Decision (ROD) prepared by PRC Environmental Management, Inc. (PRC) for Moffett Federal Airfield (Moffett Field), California. Mr. Michael Gill of the U.S. Environmental Protection Agency (EPA) submitted comments in a letter dated July 28, 1994. Mr. Joseph Chou of the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), submitted comments in a letter dated August 19, 1994.

Comments from Mr. Michael Gill, EPA

General Comments

Comment 1: Overall, the Naval Air Station Moffett Field - Draft Operable Unit 2 - East ROD contains the majority of the necessary elements identified by the Interim Final Guidance on Preparing Superfund Decision Documents (OSWER Directive 9335.3-02).

Response: *No response required.*

Comment 2: Please make it clear that the ecological assessment will not cause the ROD to be amended once the ecological assessment has been completed. Substantive changes could occur to the ROD as a result of ecological risks. This issue needs to be addressed in the ROD.

Response: *Risks to ecological receptors located within OU2-East are being evaluated under the station-wide ecological assessment. If ecological risks are identified at OU2-East, they will be addressed through the station-wide RI/FS and ROD; therefore, this ROD should not be amended based on the results of the ecological assessment. This has been clarified on page 10 of the draft final ROD.*

Comment 3: Site 19 is included in the operable unit and has been left out of the ROD in various sections. Please include it.

Response: Site 19 consists of four former underground storage tanks (USTs). These USTs are addressed through the Installation Restoration Program (IRP) petroleum sites program and, therefore, have been excluded from this ROD. A complete rationale for addressing this site under the IRP petroleum sites program is included in the Final IRP Petroleum Sites Characterization Report. The decision document for Site 19 is the IRP Petroleum Sites Corrective Action Plan.

Specific Comments

Comment 4: Page 1, Statement of Basis and Purpose, Paragraph 1. For consistency with the EPA guidance document, the words "to the extent practicable" should be inserted before "...the National Oil and Hazardous Substances Pollution Contingency Plan (NCP)."

Response: The referenced paragraph was amended as requested.

Comment 5: Page 1, Statement of Basis and Purpose, Paragraph 2. The presentation of the administrative record index in Attachment 1 of the ROD is unnecessary. A statement identifying that the information supporting the 'no action' decision is located in the administrative record and is sufficient. The administrative index may be placed with the administrative record file. If the Navy feels it wants to include this index, please explain why.

Response: The statement has been revised to identify that the information supporting the no-action decision is located in the administrative record.

Comment 6: Page 1, Statement of Basis and Purpose. The last sentence should read "The United States Environmental Protection Agency (EPA) and the State of California concur with the selected remedy."

Response: The ROD has been revised accordingly.

Comment 7: Page 1. An "Assessment of Site" section should be included between the "Statement of Basis and Purpose" and "Description of the Selected Remedy" sections on page 1. It can be as simple as:

"The identified contaminants of concern at OU2-East do not present any potential human health risks and therefore no action is necessary. A station-wide ecological assessment is being conducted and will be included in the station-wide ROD."

If there was a reason why this was not included in the draft ROD, please explain.

Response: The section has been added as suggested.

Comment 8: Page 1, Description of the Selected Remedy. This presentation should provide a brief summary of OU2-East and its relationship to the Moffett Field Naval Air Station basewide management strategy.

Response: The ROD has been revised to include a discussion of OU2-East and its relationship to the basewide management strategy.

Comment 9: Page 2. Please include Site 19 in both sections where the sites are listed.

Response: See response to general comment 3 above.

Comment 10: Page 2, Declaration Statement. This section should address the issue of whether hazardous substances remain on-site and whether a five-year review will be implemented.

Response: The Declaration Statement has been revised to indicate that although hazardous substances remain on site, they pose no risk to human health and no remedial action will be implemented. A 5-year review, therefore, is not required for OU2-East.

Comment 11: Page 2, Declaration Statement. The ROD signatures should be changed to replace the EPA remedial project manager (RPM) with the Region IX Federal Facilities Cleanup Office Branch Chief, Julie Anderson-Rubin. We are not sure whether the State RPM has signature authority for a ROD either.

Response: The ROD was changed to include Ms. Anderson-Rubin, rather than the EPA RPM. Also, DTSC has indicated the name of the appropriate state signatore.

Decision Summary

Comment 12: Page 1, Site Name, Location, and Description, Paragraph 3. The National Aeronautics and Space Administration (NASA) borders Moffett Field on the northern side as well.

Response: Page 1 of the decision summary has been modified to clarify this point.

Comment 13: Page 3, Site Name, Location, and Description, Last Paragraph. Please remove the sentence "The A and B aquifers are not presently used because they produce only low yields of brackish water over most of NAS Moffett Field." The statement is not true.

Response: The draft has been revised to remove the part of the sentence that explained the non-use of the aquifers.

Comment 14: Page 4, Site Name, Location, and Description, Paragraph 2. Please remove the sentence "However, potential uses for the A aquifer zone are limited due to various physical, environmental, health and economic factors." This is obviously a subject of great discussion and does not belong in this document.

Response: The sentence has been removed as suggested.

Comment 15: Page 10, Site History and Enforcement Activities. Please include a description of Site 19 in this section.

Response: See response to general comment 3.

Comment 16: Page 10, Highlights of Public Participation. Please include some mention of the Technical Assistance Grant (TAG), the Technical Review Committee (TRC) and the future involvement of the Restoration Advisory Board (RAB).

Response: This section has been modified to include a discussion of these subjects.

Comment 17: Page 11, Scope and Role of Response Action. Please elaborate on the "first phase" of source control activities for Site 12.

Response: The reference to the first phase of source control activities for Site 12 was removed to clarify that Site 12 activities are still underway.

Comment 18: Page 11, Scope and Role of Response Action. Please update the ROD schedule for OU5 (assuming a new schedule is agreed upon).

Response: A scheduled completion date for the OU5 ROD has not been agreed upon.

Comment 19: Page 11, Scope and Role of Response Action. Please include the site-wide ROD and its schedule.

Response: The station-wide ROD and its scheduled completion date have been added to the list of RODs.

Comment 20: Page 12, Site Characteristics, Paragraph 3. Please provide a statement describing how data quality was determined and used in the ROD. Example language might read

"The quality of data for the sampling and analysis at this site was considered in the selection of the remedies for OU2-East in accordance with the NAS Moffett Field Quality Assurance Project Plan of July 1992."

Response: A statement describing how data quality was determined and used in the ROD has been added to this section.

Comment 21: Page 17, Summary of Site Risks, paragraph 2. Please change the description of the transfer to NASA to the past tense.

Response: The ROD has been revised as suggested.

Comment 22: Page 17, Summary of Site Risks, Paragraph 3. The second sentence should be modified to read "EPA generally considers an incremental lifetime cancer risk (ILCR) greater than 1×10^{-4} to be unacceptable although risk management decisions are considered for an ILCR range of 1×10^{-6} to 1×10^{-4} ." The value 1×10^{-4} is a departure point.

Response: The sentence has been modified as suggested.

Comment 23: Page 17, Summary of Site Risks, paragraph 4. The text describing beryllium should amplify the point that no past uses of beryllium have been identified at Moffett Field and therefore there is no potential for fate and transport. It should provide a clear explanation as to why beryllium is not a risk at this site.

Response: The Navy modified the ROD to include a discussion of no past uses of beryllium. Also, an explanation of why beryllium is not a risk at the site has been added. (However, the potential for fate and transport of background constituents has not been evaluated.)

Comment 24: Page 21, Summary of Site Risks, Paragraph 2. The fact that no feasibility study was conducted should be mentioned. It should also be explained that this is why there is no mention of remedial alternatives in this ROD.

Response: The ROD has been modified on page 16 to discuss these issues.

Comment 25: Table 2. ILCRs and hazard quotients (HQs) should not have been recalculated after removing the risks attributable to beryllium. The ROD should present the same data as the remedial investigation (RI) and the proposed plan. Please include this data and communicate why it is an acceptable risk.

Response: The values in Table 2 have been revised to include risks attributable to beryllium. The table also includes a statement indicating that beryllium is not a site risk because it is at background levels.

Comment 26: Reference List. Please include a reference list, if applicable.

Response: A reference list has been added.

Comments on Responsiveness Summary

The responsiveness summary and transcript of the public meeting were received at EPA on July 25, 1994. We have no comments on either. Please be sure to include the responsiveness summary in the final version of the ROD.

Response: No response required.

Comments from Mr. Joseph Chou, DTSC

General Comments

Comment 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.

Response: The Navy revised the ROD to include Mr. Anthony J. Landis as the state signatore.

Comment 2: Page 3, First Paragraph, Last Sentence. The Navy should clarify the sentence as follows: "With the exceptions of several small ponds maintained on the NAS Moffett Field golf course as water hazards, stormwater drainage ditches, standing water after floodings or rainfall, and the wetlands described above, no other surface water features are present at NAS Moffett Field."

Response: The ROD has been modified as suggested.

Comment 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 (that is, 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 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 was only found in the northern part of the base adjacent to the stormwater retention pond and the Cargill evaporation pond.

Response: The text has been modified to clarify that the A and B aquifers are not presently used at Moffett Field and the upper aquifers are considered potential drinking water sources.

Comment 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 . . ."

Response: The sentence has been revised as suggested.

Comment 5: Page 6, Last Paragraph. Sites 9, 14 and 19 (Tanks 2, 43 and 53) should be included in OU2-West; Site 19 (Tank 14) is part of OU2-East.

Response: Sites 9, 14, and 19 are part of the IRP petroleum sites program since they are petroleum UST sites. This is explained on pages 6 and 10 of the draft final ROD.

Comment 6: Page 11, Scope and Role of Response Action. The schedule of station-wide ROD should be included in the table.

Response: The station-wide ROD has been added to the list of RODs.

Comment 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.

Response: Table 2 has been revised to include HI values, rather than HQ values.

Comment 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.

Response: Table 2 values have been corrected to include risks attributable to beryllium.