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Ser 09ER5/L5024  
21 Oct 1994

Mr. Michael Gill  
Remedial Project Manager  
U.S. EPA Region IX, Mail Stop H-9-2  
75 Hawthorne Street  
San Francisco, CA 94105

**Subject: Schedule for NAS Moffett Field Phase I Site-Wide Ecological Assessment**

Dear Mr. Gill:

The Navy has received the additional comments on the Draft Phase I SWEA provided by EPA in a letter dated October 13, 1994 and the additional comments provided by DTSC in a letter dated October 17, 1994. The subject report is a secondary document and all parties (EPA, DTSC, the Navy) have been in consultation and in agreement that significant progress has been made. The EPA letter of October 13, 1994 requested a response by October 16, 1994 (the target date for the draft final Phase I SWEA). The Navy has since been in contact with both the EPA and DTSC (phone calls between you and I of October 19 and 20, 1994; my meeting with Joseph Chou of DTSC on October 18, 1994 here in San Bruno; and the phone conference call of October 20, 1994 between yourself, Joseph Chou, and myself) to clarify the comments in their respective letters and per these conversations all parties have mutually agreed that this letter shall satisfy any agency requirements for a timely response.

The contents of this letter outlines the agreement reached by all parties and satisfies all concerns of the agencies including those stated in the EPA letter dated October 13, 1994 and DTSC's letter dated October 17, 1994.

- Per our discussions, the Navy will provide to you the Phase I SWEA reports which will include the following:

1) Methodology for searching the toxicological literature. A summary of the literature will be incorporated into the existing toxicity profiles presented in the draft Phase I SWEA report for the following chemicals:

- a) Vanadium
- b) Boron
- c) Cobalt
- d) Manganese
- e) Barium
- f) Beryllium
- g) Molybdenum
- h) Thallium
- i) TPH weathered
- j) TPH (motor oil) in relation to site specific contamination
- k) TPH (diesel) in relation to site specific contamination
- l) Chlordane

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2) A revised list of contaminants of concern (COC) to include: the 13 COCs of the draft Phase I SWEA; endrin and endrin aldehyde; copper, zinc, nickel, silver and antimony; motor oil, diesel, and TPH unknowns; and PAHs (which will be represented by an indicator chemical to be determined following a toxicity profile in the Phase II work plan.) (This is also to include a revision of Table C1) A total of approximately 24 COCs will be examined.

3) The "Executive Summary" will include a discussion pertaining to:

- i) what will now be included in the Phase I SWEA; the Phase II SWEA work plan; and the Phase II SWEA report;
- ii) the Phase II SWEA work plan which will include the COC list that will be subject to revision depending on the results of the additional sampling that has already occurred (in the "Additional Sites Investigation" (ASI)); and
- iii) the Phase II SWEA report that will include the toxicity profiles for the approximately 24 COCs which will be performed per the EPA letter dated October 13, 1994.

4) Revisions in the wetlands, uplands, preliminary conclusion, and preliminary recommendations sections of the draft phase I SWEA; revision to existing tables to include sediment grain size data; and reformatted tables due to agency comments and new available data.

• The Phase II SWEA work plan shall include:

- 1) Scope of work for the Phase II SWEA report.
- 2) Toxicity profile for determining a PAH as an indicator chemical.
- 3) Summary of the ASI and OU6 RI sample results (which should answer agency questions pertaining to detection limits).

• The Phase II SWEA report shall include:

- 1) Risk assessments for approximately 24 COCs (depending on the sampling results and toxicity profiling, this number could change).
- 2) Modeling of possible contaminant migration to Cargill Salt evaporator ponds.
- 3) Evaluation of VOC risk to burrowing owls.
- 4) Other tasks as scoped in the Phase II SWEA work plan.

By incorporating "over-the-shoulder" reviews and applying more resources to the task, the draft final phase I report will be submitted by December 12, 1994. Additionally, per our phone conversations, by implementing only the changes reflected above, all parties would agree this would provide a complete and comprehensive evaluation of ecological risks at Moffett Federal Air Field.

Since the draft final phase I SWEA is essential in producing the draft phase II work plan, and in order to incorporate the data from the ASI which should be available from the validators at the end of November, 1994, the Navy requests an extension for submittal of the draft phase II SWEA work plan to January 9, 1995.

If you have any questions regarding the Navy's position, please call me at (415) 244-2563.

Sincerely,

Original signed by:

**STEPHEN CHAO**  
BRAC Environmental Coordinator

Copy to:

Department of Toxic Substance Control (Attn: Mr. Joseph Chou)  
Regional Water Quality Control Board (Attn: Michael Bessette)  
NASA (Attn: Sandra Olliges)  
MHB Consultants (Attn: Peter Strauss)  
Regional Water Quality Control Board (Attn: Susan Gladstone)

Blind copy to:

09CMN  
Dr. Joseph P. LeClaire/Montgomery Watson  
Mr. Mike Young/PRC Environmental Management, Inc.  
Admin. record (2 copies)  
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File: NAS Moffett