

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2  
700 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737

(510) 540-3724



February 1, 1995

Commander  
Department of the Navy  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
Attn: Mr. Stephen Chao, Project Manager  
900 Commodore Drive, Bldg. 101  
San Bruno, California 94066-2402

Dear Mr. Chao:

**BASE REALIGNMENT AND CLOSURE CLEANUP PLAN (BCP) REVISION 2,  
MOFFETT FEDERAL AIRFIELD**

The Department of Toxic Substances Control (DTSC), has reviewed the subject document dated December 9, 1994 and forward the following comments for your consideration.

**GENERAL COMMENTS**

According to the Federal Facility Agreement, six Operable Units (OUs) and nineteen potentially contaminated sites were identified at the Moffett Federal Airfield (MFA). In the revised FFA, four more sites have been added to the original list, OU-3 has been removed from CERCLA process, OU-4 was deleted and is subject to Middlefield-Ellis-Whisman (MEW) Superfund site Record of Decision (ROD). However, a new numbering system, including 30 IRP sites, 12 study areas and operable units (OUs), is introduced in the BCP. If the new numbering system and OU/Study area designation are proposed, the Navy should first consult with the regulatory agencies and make all the necessary changes in a consistent manner and in accordance with the NCP and requirements of CERCLA.

**SPECIFIC COMMENTS**

1. Page ES-3, 3rd Paragraph

Please explain how to define "study areas", what are the differences between "OUs" and "study areas", what kind of decision documents and response actions will be associated with the "study areas"?

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2. Page 3-6, Section 3.1.2

Please clarify if it is appropriate to assign a site number for OU5, OU6, SWEA, Station-Wide RI, and West Side Aquifers. In addition, please explain why Site 20 is reassigned to OU-6, it was designated to "Zook Road fuel spill".

3. Page 3-21, Section 3.3.1.1

Please note that on August 23, 1993, California Governor Pete Wilson designated the Secretary of California Environmental Protection Agency (Cal-EPA) and the Secretary of the California Resources Agency as California's State Natural Resources Trustees for natural resources within their respective purview. The DTSC and the Department of Fish and Game were further delegated with the natural resource trustee responsibility.

4. Page 4-11, Table 4-1

The Department has not received any Remedial Design documents from the Navy, and not to our knowledge that Site 8 was part of OU2 Remedial Action Plan.

5. Page 5-5, Figure 5-1

Please provide the correct schedule for Site-Wide Ecological Assessment. Site 24 and 25 should be included in Figure 5-1.

6. Page 6-14, Section 6.20

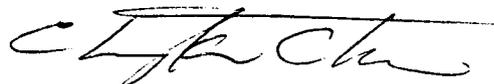
In addition to the station-wide RI, there still are other ongoing investigation such as SWEA and active petroleum sites investigation.

7. Page 6-16, Table 6-1

Please clarify the "limited recreational uses" for OU1.

If you have any questions, please call me at (510) 540-3830.

Sincerely,



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

cc: See next page

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cc: Mr. Michael Bessette  
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