



MONTGOMERY WATSON

N00296.002204  
MOFFETT FIELD  
SSIC NO. 5090.3

April 19, 1995

Mr. Stephen G. Chao, P.E.  
Engineering Field Activity West  
Naval Facilities Engineering Command  
900 Commodore Way, Code 1813SC  
San Bruno, CA 94066

Contract No: N62474-88-D-5086  
CTO 0236

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Subject: Moffett Federal Airfield Remedial Investigation/Feasibility Study  
Response to EPA Comments on the Draft Final Phase I Site-Wide Ecological  
Assessment (SWEA) Report

Dear Stephen:

Enclosed please find three (3) copies of the above referenced document. These responses to EPA comments supplement the responses to DTSC/RWQCB comments that were transmitted to you on April 11, 1995. This document is in partial fulfillment of Contract No. N62474-88-D-5086, Contract Task Order 0236. We will finalize the Phase I SWEA Report, pending approval from the regulatory agencies on these responses to comments.

Should you have any questions please contact either Ruth Siegmund or Joe LeClaire at (510) 975-3400. Thank you for your attention to this matter.

Sincerely,

*John D. Walsh for Kimberly Walsh*

Kimberly A. Walsh  
Project Scientist

*Joseph P. LeClaire*

Joseph P. LeClaire, Ph.D.  
Project Manager

2204

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**ENVIRONMENTAL PROTECTION AGENCY  
DRAFT - FINAL PHASE I SITE-WIDE ECOLOGICAL ASSESSMENT  
NAVAL AIR STATION - MOFFETT FIELD**

Comments by Michael Gill, Remedial Project Manager, provided via facsimile dated April 17, 1995

**Comment No. 1:**                    **Table ES-1 - Where are the PAH's? Even though the indicator chemical has not been agreed on at this point, PAH's should be in here as a COC. They are reflected in the text and should be in the table too. Also, is this table a lot different than Tables 6-1/7-1 or are Tables 6-1/7-1 just more detailed?**

**MW Response:**                    The following footnote has been added to Table ES-1:

Note: The following chemicals will be retained pending further evaluation in the Phase II SWEA Work Plan:

- Volatile organic compounds (VOCs) because of the potential risk to the burrowing owl from VOCs in the burrows.
- One or more polycyclic aromatic hydrocarbon (PAH) indicator compounds as determined by the toxicity profile for PAH compounds.
- Non-PAH semivolatile organic compounds (SVOCs) because of elevated reporting limits.

Table ES-1 is a summary of the chemicals of concern (COCs) retained in the different media of the wetlands, landfills, and uplands. The chemicals listed in Tables 6-1, 6-2, and 7-1 through 7-6 have been detected at least once in the medium described in the title of the table. The footnotes on each individual table provide rationale for whether a chemical was retained or eliminated as a COC. All individual compounds that remained COCs were shaded. Detailed comments were provided for chemical classifications that were retained pending further evaluation (such as VOCs, PAH compounds, and non-PAH SVOCs described in the footnote above).

**Comment No. 2:**                    **Table ES-2 - This table appears to be out of order. Please put location and media in every column so that no questions arise as to which criteria apply to which locations.**

**MW Response:**                    Table ES-2 has been modified to provide more clarity.

**Comment No. 3:**                    **p. ES-11 - Why did you take out the section on habitat value of the NE corner of the eastern diked marsh? It appears in the draft version, but not here.**

**MW Response:**                    The following paragraph has been added to the Executive Summary:

The diked brackish marshes (eastern and western diked marshes) provide habitat of moderate value. The northeast corner of the eastern diked marsh has a relatively high chemical load, resulting from historical discharge of storm water from Lindbergh Avenue storm drain channel. A potentially completed pathway exists between chemical sources and receptors in this habitat.

**Comment No. 4:** Are the two sections presented as Chapter 6 going to be combined in the final? The same question applies to Chapter 7. It makes the most sense for sake of the RAB and other uninitiated parties to do this. Another option to clear up any confusion is to address this problem in the Executive Summary.

**MW Response:** Please see response to California EPA/DTSC's General Comment No. 1.

**Comment No. 5:** Figures 6-28 thru 6-43 are missing in my copy. Also, Figures 6-45 and 6-46.

**MW Response:** Montgomery Watson apologizes for the omission of these figures in the EPA's copy of the Draft-Final Phase I Site-Wide Ecological Assessment (SWEA). A copy of Figures 6-28 through 6-43, 6-44, 6-46, and 7-2 through 7-14 will be sent to the EPA to Michael Gill's attention.

**Comment No. 6:** Figures 7-2 thru 7-14 are missing in my copy.

**MW Response:** Please see response to EPA's Comment No. 5 above.

**Comment No. 7:** As discussed at the SWEA Phase II meeting of January 9, 1995, chlordane in wetland sediments should be retained as a chemical of concern because of the following reasons:

- it is detected in 25% of detections (Table 6-2)
- there are detected concentrations above the ERL level.

**MW Response:** Please see response to California EPA/DTSC's General Comment No. 7.

**Comment No. 8:** Please mention VOCs as being considered in further analysis with regard to burrowing owls in a footnote to the table of COCs.

**MW Response:** Please see response to EPA's Comment No. 1.