

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
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April 28, 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:

NAVY RESPONSE TO AGENCY COMMENTS ON THE DRAFT FINAL ECOLOGICAL ASSESSMENT TECHNICAL MEMORANDUM, OPERABLE UNIT 1, MOFFETT FEDERAL AIRFIELD

The California Environmental Protection Agency (Cal/EPA) has reviewed the subject document. Comments have been prepared by the Department of Toxic Substances Control (DTSC) and the San Francisco Regional Water Quality Control Board (RWQCB). The revisions may be done in several ways: by submitting revised pages with the reason for the changes noted, by the use of strikeout and underline, or by cover letter stating how each of the comments here have been addressed. Furthermore, the comments should be incorporated in the Final OU1 Feasibility Study and any other applicable future documents as well.

SPECIFIC COMMENTS

1. Page 6, Response to Comment 7

The State has previously expressed concern with the potential for leachate formation under landfill 1 and 2, with subsequent movement to the surface, since the landfill material appears to be in contact with shallow groundwater. Page 6 indicates a subsurface interceptor trench is added to the recommended alternative for site 1. The trench is to be located between the landfill and the storm-water retention ponds (SWRP) to collect leachate plumes that migrate towards the SWRP.

The draft final OU1 feasibility study mentioned that groundwater in the A1-aquifer zone in the northern part of MFA flows in the direction of the storm sewer lift station (Building 191). The groundwater will then be further discharged to Northern Channel. Therefore, an interceptor trench should also be placed between the landfill and Building 191.

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The potential impacts on aquatic receptors in the storm-water retention pond(SWRP) or in the Northern Channel could be monitored by conducting aquatic toxicity tests on the groundwater(obtained during monitoring). The State suggests such tests be considered as part of the monitoring requirements for the landfills if there is uncertainty concerning release of leachate from the landfills to surface waters.

2. Page 7, Response to Comment 8

If gamma emitting radionuclides are present in the landfills, then gamma radiation may penetrate the proposed soil cap and complete the exposure pathway at the surface. As noted in the response to comments, radionuclides may also be added to the groundwater monitoring program, if requested by the State. As indicated in our previous comments, radionuclides may be contaminants of concern due to uncertainties in site characterization and in materials disposed. Therefore, the Navy should provide previous radiological survey results for regulatory agencies' review; otherwise, a survey should be conducted prior to OU-1 remedial design.

3. Page 2 and 8, Responses to Comments 5 and 12

The responses to Comments 5 and 12, regarding wetlands destruction, does not conform to California Department of Fish and Game(DFG) criteria for wetlands delineation, which is different from the U.S. Army Corps of Engineers(COE) criteria used. The Navy should assure that DFG's comments will be taken into consideration in the selection of remedial actions.

4. Page 11, Response to Comment 19

Comment #19 regarding possible impacts to burrowing owls during cap construction activities has not been adequately addressed. Although the landfill areas are accessible by roadways, as noted in the Response to Comments, burrowing owl activity may be disrupted by cap construction due to the presence of earth-moving equipment or excess noise. Because the burrowing owls have been observed in the vicinity of the landfills, the issue of disturbance should be taken into account in the remedial design phase.

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If you have questions regarding these comments, please contact me at (510) 540-3830 to ensure a coordinated approach for all regulatory comments.

Sincerely,



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Remedial Project Manager
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Office of Military Facilities

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