



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

September 8, 1995

Mr. Stephen Chao
Naval Facilities Engineering Command
Engineering Field Activity, West
900 Commodore Way, Bldg. 101
San Bruno, CA. 94066-2402

Re: *Draft Final Phase II Site-Wide Ecological Assessment Work Plan* Response to Comments,
dated August 25, 1995

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject response to comments. Although certain comments were not addressed to our final satisfaction, we agree with the proposal that remaining outstanding issues can be clarified at future meetings and addressed in technical memoranda to be included in the Phase II Site Wide Ecological Assessment (SWEA) Report. The workplan should now be finalized with the changes proposed in the response to comments. The following is a summary of the outstanding issues related to this response to comments. These issues do not need a response prior to finalizing the workplan, but should be agenda items at future Phase II SWEA meetings.

Reference Locations. Discussions at past meetings were directed at using a bioassay approach in lieu of using ER-L levels, and summarizing data related to biological responses. EPA believes that a 90% survival rate should be the necessary criteria for the control (e.g. home sediments), 80% survival is the necessary criteria for the reference site and ideally, the decision criteria for remediation should be a target response of 20% mortality or greater. Clarification of these issues can be made at future meetings.

Significant No Effects Criteria. Ideally, EPA believes that mortality would be considered significant if greater than 20% at a test or reference location. Based on examining the data already collected at Moffett Field, a preliminary site specific case has developed where there appears to be a mortality cutoff at 30%. This difference from the ideal case stated above (20%) is initially acceptable to EPA, but bioaccumulation effects still need to be considered.

Assessment and Measurement Endpoints. Site specific bioassay data need to be used in a ratio to show possible effects. With concurrence from DTSC and RWQCB, EPA would suggest that the LOAEC be used as opposed to the NOAEC as discussed previously. This is based on data collected on site, which presently suggests a cutoff at 30% for mortality level. This would be used as the denominator in the ratio. The numerator is the observed chemical concentration at locations where bioassays were not performed. If the ratio is less than 1, the concentration at this location is not significant. If the ratio is greater than 1, the concentration is significant and would indicate a problem at that particular location.

The Federal Facility Agreement schedule showed that this document was to be finalized on August 25, 1995, but we only received the response to comments. With issues still outstanding, we agree that it is in the best interest of all to delay finalizing any document until problems are resolved. In the future, we would ask that you provide us notice of your intent to delay a document's release ahead of time. The workplan should now be finalized with the changes proposed in the response to comments. If you have any questions, please call me at 415-744-2385 or Clarence Callahan for technical direction at 415-744-2314.

Sincerely,



Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

cc: C. Joseph Chou (DTSC)
Michael Bessette (RWQCB)
Ken Eichstaedt (URS)
Sandy Olliges (NASA)
Peter Strauss (MHB)
Mike Young (PRC) (Fax)