

DEPARTMENT OF TOXIC SUBSTANCES CONTROL400 P STREET, 4TH FLOOR
SACRAMENTO, CA 95814

August 21, 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:

**REVISED FINAL OPERABLE UNIT-6 REMEDIAL INVESTIGATION(RI) REPORT
AND NAVY'S RESPONSE TO AGENCIES COMMENTS, MOFFETT FEDERAL
AIRFIELD DATED JULY 20, 1995.**

The Department of Toxic Substances Control (DTSC) has received and reviewed the subject documents. We're pleased that most of our comments have been adequately addressed. However, the following comments still remain unresolved and should be revised in the final report. To our understanding, the Navy will respond to the following comments and provide the revised pages for the Department's review and approval prior to the issuance of the Final RI report. The Department considers that the parties of the Federal Facility Agreement (FFA) are in the informal dispute resolution phase. We are invoking the informal dispute resolution if such action has not been taken by any of the parties. If you have any questions, please contact me at (510) 540-3830.

COMMENTS

1. Comment 2 and 6: We are concerned with the wording "appropriate narrative". We feel strongly that opinions and comments should be removed from the main body of the risk assessment and put into the uncertainty section. Any discussion of differences between the regulatory agencies guidance should be limited to a description of actual differences. The narrative should not attempt to create or magnify perceived differences in guidance between the different agencies involved.
2. Comments 10, 12, and 18: The exposure scenarios should be located adjacent to each other and given "equal weight" in the text and tables. We are not aware that the 3 days per week scenario represents EPA's position. In addition, DTSC has sometimes designated a fractional exposure for apportioning exposure from a site. We would imagine that the majority of an

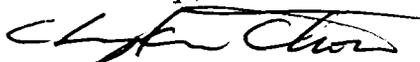
adult's soil exposure would occur during active outdoor activity (where dust levels are higher) as opposed to more passive indoor activities such as office work, reading or watching TV. Therefore, we would suggest that about one eighth of an individual's daily soil exposure would come during their one hour outdoor recreational time and that the daily exposure parameters be calculated accordingly.

3. Comments 14 and 15: The responses to comments 14 and 15 of "comment noted" is ambiguous. It seems to indicate the Navy will not change the document. DTSC is still of the opinion that the toxicity profiles of arsenic and chromium do not reflect current understanding of their toxicity and will not be able to support the corresponding portions of the risk assessment in public meetings or other forums.

4. Section 7.4: The Department cannot concur with the Navy that remediation is not necessary for OU6 to mitigate human health risks. The cumulative human carcinogenic risks, mainly due to Arochlor 1254 and Arochlor 1260, are greater than 10^{-4} as it was mentioned in Section 7.3. DTSC considers that 10^{-6} as a point of departure and the level of 10^{-4} are subject to remediation. However, the Phase II Site Wide Ecological Assessment (SWEA) work is still in progress. Therefore, the remediation decisions should be made after the SWEA is completed.

5. Executive Summary: The inconsistencies between the Executive Summary and Section 7.0 Summary and Conclusions should be corrected. The DTSC exposure parameters should be included in the Executive Summary as well.

Sincerely,



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Remedial Project Manager
Base Closure Unit
Office of Military Facilities

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