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October 23, 1995

Mr. Stephen Chao  
Engineering Field Activity - West  
Naval Facilities Engineering Command  
900 Commodore Drive - Building 101  
San Bruno, California 94066-2402

**Comments**

**Draft Proposed Plan - OU5  
Moffett Federal Airfield**

Dear Mr. Chao:

As a member of the Technical, Historical, and Educational (THE) Committee of the Moffett Federal Airfield (Moffett Field) Restoration Advisory Board (RAB), I have reviewed the Draft Proposed Plan (Plan) for Moffett Field Operable Unit 5 (OU5). The Plan was distributed with the September 15, 1995, letter from Michael Young of PRC Environmental Management, Inc. To help coordinate my comments with those of the state regulatory agencies, I have discussed the comments with Joseph Chou of the California Department of Toxic Substances Control (DTSC) who has passed them on to Mr. Young. I am sending this letter to confirm my comments for the record and to thank you for the opportunity to review the draft document. My comments follow.

- 1) I believe that the Plan would be more useful to the lay public if it provided a clearer statement of how OU5 fits into the overall Moffett Field environmental restoration program. For example, the Plan should include a brief description of the overall subdivision of Moffett Field into Installation Restoration Sites (IR Sites), OUs, petroleum and Superfund programs, etc., and a statement of how OU5 fits into this scheme in terms of geography, chemicals to be addressed, and schedule.
- 2) The Plan maps should be revised to clarify the identities and locations of all IR Sites, of OU5, and of the plumes to be addressed in OU5. In particular, Figure 2 should better identify OU5 and all current IR Sites. Figure 4 should better distinguish the northern and southern plume areas, the location of the boundary between groundwater having total dissolved solids (TDS) concentrations over and under 3,000 parts per million (ppm), and the extent to which the northern and southern plume areas are interpreted to be separated by relatively less contaminated groundwater, rather than being arbitrarily divided by the 3,000 ppm TDS boundary.
- 3) The Plan should be revised to accurately reflect the history of environmental investigations at Moffett Field. 1984 is the date given in the Plan for the start of such programs, but by then groundwater investigations had been underway for several years and had already confirmed the existence of significant Navy sources of chlorinated solvents to OU5 groundwater.

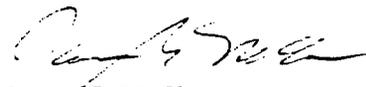
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- 4) The Plan should be revised to accurately reflect the current roster of IR Sites, which now number over 20.
- 5) The Plan should be revised to accurately reflect past and current uses of groundwater at Moffett Field. The Plan currently states that none of the aquifers at Moffett Field have been used for drinking water purposes to date. I believe that at least former Navy Wells 14M01 and 14M02 were installed as drinking water supply wells in the 1930s.
- 6) The description of the degree to which identified remedial alternatives meet the nine feasibility study evaluation criteria should be clarified in light of the unusual (for the San Francisco Bay Area) headings under which some features of some alternatives were evaluated (e.g., the assertion that Alternatives 1 and 2 have the greater short-term effectiveness than active remediation, because it will take essentially no time to implement "no-action" alternatives).

In addition, I concur with the comments submitted by Mr. Chou in his October 5, 1995, letter to you.

I understand from Mr. Chou that he has discussed these comments with Mr. Young in context with the State of California's comments and that Mr. Young has indicated that PRC will attempt to modify the Plan to address these issues before the Plan is released to the general public. Again, thank you for the opportunity to have this input. If you or PRC have any questions, please call.

Yours very truly,



James G. McClure  
Moffett Field RAB, THE Committee member

cc: Michael Young  
Michael Bessette  
Joseph Chou  
Michael Gill  
Elizabeth Adams  
Sandy Olliges  
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