TE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY
PARTMENT OF TOXIC SUBSTANCES CONTROL
ION 2
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N00296.002399
MOFFETT FIELD
SSIC NO. 5090.3

October 5, 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:

THE DRAFT PROPOSED PLAN, OPERABLE UNIT-5, MOFFETT FEDERAL AIRFIELD

The Department of Toxic Substances Control (DTSC) and the San Francisco Regional Water Quality Control Board (RWQCB) have reviewed the subject document and prepared following comments for your consideration. If you have any questions, please contact me at (510) 540-3830 to ensure a coordinated approach for all regulatory comments.

Sincerely,

C. Joseph Chou
Remedial Project Manager
Base Closure Unit
Office of Military Facilities

cc: Mr. Michael Bessette
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Mr. Michael D. Gill
U.S. Environmental Protection Agency
Region IX, Mail Stop H-9-2
75 Hawthorne St.
San Francisco, California 94105

Ms. Sandy Olliges
Assistant chief
Safety, Health and Environmental Services
National Aeronautics and Space Administration
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To Stephen Chao	From Joseph Chou			
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2399

Mr. Peter Strauss
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1723 Hamilton Avenue, Suite K
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COMMENTS

1. Page 2, Figure 2; Page 3, Facility Background

Please explain why only 19 sites were addressed. Twenty-four sites have been identified at Moffett Federal Airfield (MFA) and were mentioned in other current documents.

2. Page 4, Hydrogeology

The statement "Although water quality is not good in the deeper aquifers" is confusing and should be deleted from the document.

3. Page 4, Summary of Site Risks

It is inappropriate to state that "Chemicals associated with the highest risks include arsenic and beryllium, but these inorganic elements occur naturally". In fact, according to the OU5 Remedial Investigation Report (1993), antimony, chromium, manganese and thallium also may pose significant risks to public health. In addition, as we have pointed out in our comments on the OU5 Feasibility Study, the inorganics found at OU5 groundwater aquifers may be caused by natural processes or anthropogenic sources as well. Therefore, the Navy should clarify the differences between "ambient level" and "naturally occurring" in the Proposed Plan.

4. Page 4, Summary of Site Risks

The statement of "unacceptable risks" is incorrect. DTSC considers that 10^{-6} as a point of departure and the level of 10^{-4} are subject to remediation. According to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), unacceptable risk is generally referred to an excess upper bound life time cancer risk to an individual exceeds 10^{-4} risk level.

5. Page 4, Summary of Site Risks

Please rewrite the paragraph started with "Because the OU5 northern area groundwater....does not present unacceptable risk to occupational receptors". It is difficult to understand how "occupational risk-based concentrations" was derived and why not using site specific concentration to determine the risk level.

6. Page 4, Summary of Site Risks

Clarification should be given in the last paragraph to explain why the OU5 contaminants were not identified as SWEA COCs.

7. Page 6, Alternative 2

Please explain what is "nature degradation". In the same paragraph, "background concentration" should be replaced by "ambient concentration".

8. Page 6, Alternative 5A

Because many uncertainties of reinjecting treated groundwater into the contaminated aquifer, it may be appropriate to leave the discussion of specific discharge methods to future Remedial Design activity stage.

9. Page 8, Comparison of alternatives

Please see Comments number 3 and 7.

10. Page 9, Reduction of Toxicity, Mobility, and Volume

It is important to address how the hydraulic, especially active, controls will reduce toxicity, mobility and volume of contaminants in a much shorter time frame.

11. Page 10, Summary of the Preferred Alternative

A diagram summarizes the comparison between different alternatives will be helpful for readers to visualize why the preferred alternative was selected.