

**COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION NAVY (CLEAN)
Northern and Central California, Nevada, and Utah
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Prepared For

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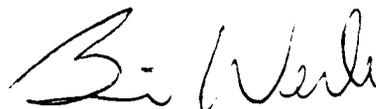
**MOFFETT FEDERAL AIRFIELD
CALIFORNIA
(formerly Naval Air Station Moffett Field)**

**RESPONSE TO COMMENTS ON
REVISED FINAL OPERABLE UNIT 6
REMEDIAL INVESTIGATION REPORT**

March 5, 1996

Prepared By

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**RESPONSE TO COMMENTS
ON
REVISED FINAL OPERABLE UNIT 6
REMEDIAL INVESTIGATION REPORT**

MARCH 5, 1996

This report presents point-by-point responses to comments from the U.S. Environmental Protection Agency (EPA) and the California Environmental Protection Agency Department of Toxic Substances Control (DTSC) on the Base Realignment and Closure Cleanup Team review version of the Revised Final Operable Unit 6 (OU6) Remedial Investigation (RI) Report dated July 20, 1995 for Moffett Federal Airfield, California. Mr. Michael Gill (EPA) submitted comments in a letter dated August 16, 1995, and Mr. Joseph Chou (DTSC) submitted comments in a letter dated August 21, 1995. Response to these comments was delayed while issues regarding risk assessment exposure scenarios were resolved.

EPA COMMENTS

Comment 1: The conclusion states that remediation is not necessary at OU6 to mitigate human health risks. However, the Navy wishes to wait for the Site-Wide Ecological Assessment (SWEA) Phase II before making a final decision regarding remediation at OU6. Human health risks were calculated based on both EPA and DTSC assumptions. There are cases in this risk assessment where the reasonable maximum exposure (RME) risk probably exceeds 10^{-4} when using DTSC assumptions (see Tables 6-62 and 6-63). All of these higher risks appear to be driven by dermal contact with soils containing Arochlor 1254, Arochlor 1260, and arsenic, typically in the Lindbergh Avenue ditch and along the Northern Channel. We believe remediation is necessary at portions of OU6 because of these human health risks. The sentence regarding the "primary conclusion" in Section 7.4 should be removed.

Response: The Navy agrees that results of the Phase II SWEA are required to make remedial decisions regarding OU6 and has made the suggested revision to Section 7.4.

Comment 2: The conclusion section of the document should also mention how the remedial investigation/feasibility study (RI/FS) process will proceed. At the scoping stage, the

parties agreed that if risks were high enough to warrant remediation, a separate FS, record of decision (ROD), and proposed plan would be written for OU6. This is cited in the federal facilities agreement. As discussed at the August 10, 1995 remedial project managers meeting, because of incomplete SWEA Phase II data, we propose that it would be more cost effective and expeditious to include any necessary future OU6 work (FS, ROD, and proposed plan) as part of the station-wide documents. In addition, the highlighted changes in Chapters 6 and 7 of this draft version of the Final OU6 RI should be proofread for spelling errors.

Response: Section 7.4, Conclusions, has been revised to state that future OU6 activities will be included in the station-wide FS, ROD, and proposed plan. Spelling errors have also been corrected.

DTSC COMMENTS

Comment 1: Comments 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.

Response: Explanations regarding DTSC and EPA risk estimates have been limited to descriptions of the actual differences between the estimates.

Comment 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 television. 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.

Response: Risk assessment Tables 6-13 through 6-17 provide both DTSC and EPA exposure values for recreational scenarios and have been given equal consideration. The DTSC-recommended recreational exposure duration for dermal contact with surface soil of 5 hours per week was included in Table 6-14 as suggested. The exposure duration of 3 hours per week shown in the EPA value column in Table 6-14 was obtained from the 1989 EPA Exposure Factors Handbook. A reference has been added to Table 6-14 for this value.

Comment 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.

Response: As stated by DTSC in Comments 14 and 15, it was not necessary to spend additional time addressing this issue and further changes were not required. The Navy, however, recognizes DTSC's position that the toxicity of arsenic and chromium may be understated.

Comment 4: Section 7.4. The Department can not 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 10^{-6} as a point of departure and the level of 10^{-4} is subject to remediation. However, the Phase II SWEA work is still in progress. Therefore, the remediation decisions should be made after the SWEA is completed.

Response: The conclusions have been revised to simply state the results of the EPA and DTSC risk estimates. Additional explanation has been added to state that remedial decisions for OU6 will be included in the station-wide FS, ROD, and proposed plan after the Phase II SWEA has been completed.

Comment 5: Executive Summary. The inconsistencies between the Executive Summary and Section 7.0, Summary and Conclusion, should be corrected. The DTSC exposure parameters should be included in the Executive Summary.

Response: The inconsistencies between Section 7.0 and the Executive Summary have been reconciled. Rather than include the DTSC exposure parameters in the executive summary, however, EPA exposure parameters have been removed and replaced with a summary of the results from both the EPA- and DTSC-derived risk estimates.