



July 18, 1996



Cal/EPA

Department of
Toxic Substances
Control

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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

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

Dear Mr. Chao:

**FINAL STATION WIDE REMEDIAL INVESTIGATION(SWRI) REPORT,
MOFFETT FEDERAL AIRFIELD**

The Department of Toxic Substances Control (DTSC) has reviewed the subject document, with particular attention to items that were agreed to in the meeting of February 23, 1996 or were discussed in DTSC's comment letters of January 24 or April 30, 1996. Significant improvements have been made from the Draft Final SWRI Report. However, as described below, there are several items that are either not in accordance with DTSC's guidance or fail to address our previous comments adequately. In order to utilize resources more effectively, it is not recommended to prepare a revised final SWRI report. Instead, the Navy should submit revised pages, or a response letter to clarify the issues mentioned below and document all the discrepancies. Upon our review and acceptance of revised pages or a response letter, then the document can be considered final. If you have any questions, please call me at (510) 540-3830.

Sincerely,

C. Joseph Chou
Remedial Project Manager
Base Closure Unit

Enclosure

cc's on next page

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CODE 184



Mr. Chao
July 18, 1996
Page Two

cc: Mr. Michael Bessette
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U.S. Environmental Protection Agency
Region IX, Mail Stop H-9-2
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Ms. Sandy Olliges
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Mr. Peter Strauss
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Mr. James G. McClure, Ph.D.
Moffett Field RAB, THE Committee
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Mr. Michael J. Wade, Ph.D.
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Office of Scientific Affairs
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Mr. Chao
July 18, 1996
Page Three

cc: Mr. John P. Christopher, Ph.D.
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COMMENTS

1. The discussion on Page 6-18 regarding exposure areas and lot sizes is not satisfactory to DTSC and is contrary to what was agreed to in our meeting of February 23, 1996. The discussion at the bottom of Page 6-18 should indicate that a value of one-half acre was chosen for residential exposure area because, due to the sampling density, using a smaller exposure area did not change the results and because the one-half acre size provided a better graphical presentation. Page 6-18 should reference the discussion of Exposure Area Size on Page F-5 and F-6 (Section F.5), which in general provided a good discussion of the issue. In any risk management decisions at Moffett Field regarding actual or planned future residences, any increase in risk as a result of the use of the larger exposure area size should be individually assessed, and if indicated, risks recalculated using an appropriate value for lot size.

2. As outlined in DTSC's Preliminary Endangerment Assessment Manual, the DTSC default value for adherence of soil to skin is 1.0 mg/cm². At both military and non-military sites where U.S. EPA and DTSC have joint oversight, it has been our uniform practice to follow the more health protective guidance where guidance between the two agencies differs. Use of 0.2 mg/cm² as a dermal adherence factor is not acceptable to DTSC except in the specific case of "Cal Modified" Region IX PRGs which may only be used for site screening at military bases. In the present document, a risk assessment is presented, not site screening using Region IX PRGs. Therefore a value of 1.0 mg/cm² must be used for the document to be acceptable to DTSC.

3. We noted several other portions of the document that were not in conformance with our guidance, but they do not by and of themselves render the document unacceptable to DTSC. In our comment letter of April 30, 1996, we noted that while DTSC is not recommending a reevaluation of the ambient (background) concentration of metals at Moffett Federal Airfield, nevertheless, in general, the methods presented in the

Mr. Chao
July 18, 1996
Page Two

Station Wide Risk Assessment are not favored by DTSC and do not meet with our endorsement. DTSC has prepared a guidance document on estimation of ambient levels of inorganics which should be utilized in any new investigation of ambient concentrations of metals. Regarding the Toxicological Profiles of Chemicals of Concern (Section 6.5.2), these were improved over earlier versions, however we found portions of several chemicals (e.g. cobalt and chromium), which we do not think present an accurate portrayal of the chemical's toxicity.