



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

N00296.003155
MOFFETT FIELD
SSIC NO. 5090.3

July 31, 1998

Mr. Stephen Chao
Naval Facilities Engineering Command
Engineering Field Activity, West
900 Commodore Way, Bldg. 210
San Bruno, CA 94066-2402

Re: Response to June 9, 1998 Responses to Comments on Revised Draft Final Station-Wide Feasibility Study Report, Moffett Federal Airfield (January, 1998)

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has reviewed the subject response to comments, which addressed EPA's previous comments on the Revised DF Station-Wide Feasibility Study Report.

EPA has four remaining concerns regarding this document. Some of these concerns may be addressed in the Proposed Plan and Record of Decision. However, the first two of these concerns must be addressed in the Final Feasibility Study Report, and EPA approval of the Report is contingent upon the Navy's response.

1. The Navy's Response to Comment 36 is insufficient. Even though the Inland Surface Water Plan and Enclosed Bays and Estuaries Plan are not in force, the Porter-Cologne Water Quality Control Act is an applicable ARAR for which the Water Quality Control Plan (Basin Plan) for the Regional Water Quality Control Board, San Francisco Bay Region is a requirement. The Basin Plan implements actions for setting soil or sediment cleanup levels when water quality is threatened. The Water Quality Objectives set forth in the Basin Plan are, therefore, applicable standards.

In addition, the U.S. EPA Ambient Water Quality Criteria are action-specific ARARs, as potential exceedances of these criteria must be considered in setting clean-up goals for contaminated sediments. The Proposed California Toxics Rule (Federal Register Vol. 62, No. 150, Tuesday, August 5, 1997), which promulgates numeric criteria for priority toxic pollutants for the State of California, should also be considered since these criteria will supersede the U.S. EPA Ambient Water Quality Criteria when the Rule is finalized.

The above-cited ARARs should be included in the Final FS Report.

2. The Final FS Report should provide the contaminant concentrations that correspond to the Hazard Quotients proposed as alternative clean-up levels.
3. The rationale for establishing sediment clean-up levels based on Hazard Quotient values is not well supported. Attached are comments by Dr. Clarence Callahan on this topic. These comments must be addressed in the development of clean-up levels for the Proposed Plan.
4. The long-term monitoring plan has not been discussed in detail, and the Navy proposes that it be developed during the remedial design phase. EPA recommends that the scope of the monitoring plan, including contingencies for further remedial action, be incorporated into the Record of Decision. We look forward to working on this Plan in conjunction with the Navy, other agencies, and resource trustees.

If you have any questions, please call me at (415) 744-2396.

Sincerely,



Lynn Suer, Ph.D.
Remedial Project Manager
Federal Facilities Cleanup Branch

Attachment

cc: J. Chou
K. Eichstaedt (URS) (email)
T. Mower (Tetra Tech EM Inc.) (email)
S. Olliges (NASA)(email)
P. Strauss (PM Strauss and Associates)(email)



MEMORANDUM

SUBJECT: Review of the Responses to Comments on te Revised
Draft Final Station-Wide Feasibility Study Report,
Moffett Federal Airfield, January 9, 1998

FROM: Clarence A. Callahan, PhD Biologist, *C. Callahan*
Technical Support Team (SFD-8B)

TO: Michael Gill, Remedial Project Manager
Navy Section (SFD-8-2)

Specific comments.

1. p4, No. 18. Use of various HQ estimates. As stated in the EPA comments, there are many problems with the use of the HQ approach and even more uncertainty and even inaccuracy with the various estimates of HQs i.e., HQ₁, HQ₂, etc. EPA does not agree that an HQ₃ should be used for avian and mammalian receptors and HQ₄ in other areas. There are other comments related to this problem (Nos. 23, 31 and 33) that could be addressed simply by recognizing that the estimates of risk at Moffett like other Navy sites is directly related to exposure concentrations as well as other factors. The most realistic and logical approach, however, to estimating risk at any site is to use the site specific concentrations observed at the site to estimate the range of exposure for site receptors. Again, the Navy approach in using four estimates of HQ does not provide the range of exposure for receptors that best represents the site because the exposure estimates are based on artifacts of the approach. Life history information (e.g., young of the year, adult, food choices, residency time, etc.) should be integrated with the site conditions (e.g., contaminant distribution, concentration of contaminants, etc.) to produce a realistic range of exposure doses that should be compared to the Navy-BTAG TRVs. In this process, a range of HQs would be estimated from which a significant risk would be identified.

The use of the most realistic HQ estimate would seem to be a logical strategy for estimating potential risk at Moffett. This is an area of the overall approach that needs more clarification and discussion between the Navy and the Agencies.

2. p6, No. 23. HQs and HIs for avian and mammalian receptors. See comments above for response to comment no. 18. EPA doesn't believe that the response addresses the comment. The comment states that the different estimates of HQ values as performed by the Navy is not acceptable, so maps displaying these values will not be of use.

3. p7, No. 26. "...most common benthic macroinvertebrate..." EPA requested a citation to support the statement. Whether or not the statement is quoted from the SWEA is immaterial. Please provide a citation from relevant literature or remove the statement because it is not supported by any data collected from the site.

4. p7, No 27. HQ₃ should not be used, see comment No. 18. The paragraph may be a direct quote from the SWEA, however, questions still remain about its accuracy especially after the site visit by Keith Miles. The paragraph should be rewritten to reflect the actual situation with the incorporation of the material provided by Dr. Miles.

5. p8-9, No. 31. RAOs. HQ₃ should not be used.

6. p9, No. 33. Allowable Exposure Levels. HQ₃ should not be used.

7. p10-11, No. 40. Areas of Attainment. HQ₃ should not be used.

8. p11, No. 41. Areas of Remediation. The response to comment No. 40 does not address the comment. HQ₃ should not be used..

9. p11, No. 44. Innovative Technologies. EPA would like to be involved in the "Bench- and pilot-scale treatability studies..." performed by the Navy.

10. p12, No. 47. HQ₃ should not be used.

11. p13, No. 48. HQ₃ should not be used.

12. p14, No. 52. Long-term Monitoring. EPA and other resource agencies would like to discuss the requirements for long term monitoring.

13. The Navy's responses to Comments 53 - 60 are the same as No. 52 with the implication that all of these comments are related to the long term monitoring effort. Using this approach, the Navy places a lot of expectations in the monitoring plan suggesting a very comprehensive, thorough and well planned document. EPA is eager to participate in the discussions of such a plan.

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