

Memorandum

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MOFFETT FIELD
SSIC NO. 5090.3

To: Ms. Adriana Constantinescu
Regional Water Quality Control Board (SFRWQCB)
San Francisco Bay Region
1515 Clay Street, Suite 1400
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Date: December 21, 2004

From: Jim Hardwick, Staff Environmental Scientist
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OPTIONAL FORM 99 (7-90)		FAX TRANSMITTAL		# of pages ▶ 5
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Subject: Review of the Addendum to the Final Station-Wide Remedial Investigation, Site 25, Former Naval Air Station Moffett Field, CA (SITE: 200068) received November 30, 2004.

Background

The California Department of Fish and Game, Office of Spill Prevention and Response (DFG-OSPR) received the subject document on November 30, 2004. The 2,200 acre former Naval Air Station Moffett Field (NASMF) is in Santa Clara County and about 10 miles north of the city of San Jose. It is adjacent to Stevens Creek and former salt evaporation ponds on the shores of south San Francisco Bay. Site 25 is currently a seasonal wetland comprised of a small storm water settling basin (about 3 acres), the 20-acre Eastern Diked Marsh and the 210-acre Storm Water Retention Pond. The Storm Water Retention Pond is subdivided into three parcels: the central (100 acres) and northeast (55 acres) basins, and the Mid-peninsula Regional Open Space District (MROSD) Parcel (55 acres). Storm water from the western portion of NASMF flows through storm drains into the small storm water settling basin, through the Eastern Diked Marsh, through culverts into the central basin, and then into either the Northeast basin or the MROSD parcel. Levees have kept tidal water from reaching site 25 for about 100 years. Since then the storm water retention pond has filled with fresh water in the winter, and dried out in the summer and fall. National Aeronautics and Space Administration (NASA) plans to manage the pond so that in the future it will contain water throughout the year and support fish life. The South Bay Salt Pond restoration project and NASA are studying the feasibility of restoring tidal action to site 25, and converting the habitat from seasonal wetland to tidal wetland.

The potential sources of contamination include storm water and sanitary sewer lines, the Runway Landfill, the Engine Test Stand area, a sump and oil/water separator, and the historical use of pesticides. The subject document presents an evaluation of the risks to wildlife from contaminants at site 25.

The comments that follow are provided as part of our role as a natural resource trustee for the State of California's fish and wildlife and their habitats. The DFG has

statewide jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of these resources. Further, the DFG has also been designated as the CERCLA Section 107 natural resources co-trustee for these resources.

General Comments

Overall the document is well organized with applicable tables and figures included.

CDFG-OSPR does not concur with the identification of chemicals with high toxicity reference value (TRV)-based hazard quotients (HQs) between one and five as "negligible risk," and not as risk drivers, particularly for special status species.

CDFG-OSPR agrees with the conclusion that a feasibility study is needed to evaluate remedial alternatives to reduce risk from lead, zinc, total DDTs, and total PCBs.

Specific Comments

1. Page ES-2. Please clarify if the second sentence in the third paragraph refers to average site concentrations of lead and zinc.
2. Page 16. Please include the 95th upper confidence limit (UCL) for the reference marsh data as well. In addition, please note that the San Francisco ambient values are calculated as the 85th percentile with α of 0.05 as the tolerance interval bounds.
3. Page 28. Please include a discussion of detection limits in the text for total DDTs and total PCBs, and evaluate whether elevated detection limits affected the apparent distribution of contamination. In addition, please explain how the total values were calculated.
4. Pages 31 and 44. Many factors may prevent the water on-site from being primarily influenced by ambient tidal conditions, and may create localized areas where diffusion of chemicals from sediment will affect concentrations in the overlying surface water over a significant period. These areas could be due to surface depressions or limited tidal exchange due to restrictions in the size of the levee opening.
5. Page 32. Please clarify if all storm water and/or sewer lines that discharge into Site 25 have been cleaned or closed. Any lines for which this has not been done may act as an ongoing source that should be addressed.

6. Page 40. Please note that the previous ecological risk assessment (ERA) is still relevant as it relates to potential risk due to current seasonal wetland conditions in combination with the evaluation of future tidal marsh conditions.
7. Page 41. Changes in sediment condition at Site 25 due to tidal connection will be based on the accretion rate of presumably cleaner sediment and the gradual burial of contamination over time. If data are not currently available for local sediment accretion rates, these data should be collected.
8. Page 47. Please note the different in sample depth range used (i.e., 0–0.5 feet versus 0–2 feet) between the human and ecological risk assessments in the second paragraph of Section 6.1.1. Please clarify if the ambient concentrations were different between the human and ecological risk assessments as inferred by statements such as “greater than the ambient concentration for the baseline HHRA [human health risk assessment] only.” Table 1 presents the two comparisons as differing on the depth range considered, not different ambient concentrations for the two risk assessments. Please resolve this discrepancy.
9. Page 48. CDFG-OSPR concurs with the conclusion that further evaluation and remedy development is needed.
10. Page D-12. Please define the abbreviation “CP” used for the peregrine falcon on Table D-1.
11. Page D-49. Please distinguish concentrations as wet or dry weight units.
12. Page D-50. Please note in the footnotes the species or class of organisms from which the bioaccumulation factors (BAFs) were originally derived.
13. Pages D-60 and D-61. CDFG-OSPR does not concur that chemicals with high toxicity reference value (TRV)-based hazard quotients (HQs) between one and five are not risk drivers and have “negligible risk,” particularly for special status species. Therefore, please revise risk drivers to include zinc for California clapper rail and total DDTs and total PCBs for great blue heron.
14. Page D-69. As mentioned in the previous comment, please remove the classification of chemicals with high TRV-based HQs between one and five as having “negligible risk,” particularly for special status species. As a result, lead should be included as a risk driver for salt marsh wandering shrew.
15. Page D-76. CDFG-OSPR agrees with the conclusion that a feasibility study is needed to evaluate remedial alternatives to reduce risk from lead, zinc, total DDTs, and total PCBs.

Conclusion

The DFG-OSPR concurs with the decision that further evaluation and remedy development is needed to address unacceptable risk to ecological receptors, and looks forward to working with the Navy to develop a plan to eliminate the potential risk to ecological receptors. Thank you for the opportunity to review the subject document. If you have any questions regarding this review or require further details, please contact Beckye Stanton by telephone at (916) 327-0916, or e-mail (bstanton@ospr.dfg.ca.gov).

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