

EOA, Inc.

Eisenberg, Olivieri & Associates
Environmental and Public Health Engineering

December 13, 2004

Scott Gromko
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Re: City of Sunnyvale Comments on October 14, 2004 Draft Record of Decision, Former
Naval Air Station Moffett Field – Site 27 – Northern Channel

Dear Mr. Gromko:

EOA, Inc. is a technical consultant to the City of Sunnyvale, assisting with review of technical documents related to former NAS Moffett Field, Site 27. EOA and City representatives have reviewed the subject document and the City staff has asked that we submit the following comments and suggestions for clarification.

Declaration Statement, pg vii - At the bottom of this page, in “Description of Selected Remedy” the last sentence contains the statement “Total polychlorinated biphenyls consisted of Aroclor-1254 and Aroclor-1260 because no other Aroclors were detected and the congener-specific data did not support the presence of other Aroclors”. This appears to be an over-simplification of the information presented in the November 6, 2003 Feasibility Study Report. We suggest that something like the following wording would be more correct: “Total polychlorinated biphenyls consisted of Aroclor-1254 and Aroclor-1260. Although some lighter and heavier congeners were detected, the congener-specific data did not support the presence of other Aroclors.....”.

Section 5.7 Nature and Extent of Contamination, pg. 16 – The first paragraph states that “storm water is known to be a major source of non-point pollution in urban and residential areas across the United States...” and that “Contaminants adsorb onto soil and sediment and can be transported with sediment to the storm drain system...”

It is not clear how these statements are relevant to the overall ROD or to this section specifically. If the intent is to explain that the northern channel was polluted by stormwater runoff from other locations on the former NAS Moffett Field, then that statement should be made clearly at the end of the first paragraph.

In the second paragraph it is stated that “concentrations of metals in sediment in the northern channel are found to be similar to concentrations in other sediments that receive

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urban runoff.” This statement is clearly not supported in the report by references or data. It is also probably not necessary for this discussion. We suggest that it should be deleted. If it is necessary to retain this statement, it should be supported by reference and/or data, and it should be clarified that this is not intended to imply that urban runoff was a source, other than drainage from the former NAS Moffett Field.

Figure 3, pg. 17 - It is our opinion that footnote 1 and the box denoting “Regional Surface Runoff” should be deleted if this figure is intended to refer specifically to the northern channel. If this figure is intended to apply at some point further downstream such as in the Moffett channel or the south bay, then that should be clarified in the title or the text that discusses the figure.

If you have any questions or wish to discuss any of these comments or suggestions, please contact me. Thank you for considering these comments and for your continued communication and cooperation with the City of Sunnyvale.

Sincerely,
EOA, Inc.



Don M. Eisenberg, Ph.D., P.E.
Principal Engineer