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MOFFETT FIELD
SSIC NO. 5090.3.A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco CA 94105-3901

July 9, 1998

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, 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., HQ_1, HQ_2, etc. EPA does not agree that an HQ_3 should be used for avian and mammalian receptors and HQ_4 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 potenital 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. HQ_3 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. HQ_3 should not be used.

6. p9, No. 33. Allowable Exposure Levels. HQ_3 should not be used.

7. p10-11, No. 40. Areas of Attainment. HQ_3 should not be used.

8. p11, No. 41. Areas of Remediation. The response to comment No. 40 does not address the comment. HQ_3 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.HQ_3 should not be used.

11. p13, No. 48.HQ_3 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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