



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

N00296_004281
MOFFETT FIELD
SSIC NO. 5090.3.A

29 May 2001

Ms. Andrea Muckerman
BRAC Environmental Coordinator
Southwest Division, Naval Facilities Engineering Command
BRAC Operations Office
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8517

Re: Evaluation of Navy Response to Comments on the Draft Addendum to the Revised Final Stationwide Feasibility Study, No Further Action Sites, Moffett Federal Airfield, dated May 2, 2001.

Dear Ms. Muckerman:

Attached please find EPA's comments on the Navy Response to Comments on the Draft Addendum to the Revised Final Stationwide Feasibility Study, No Further Action Sites. Many of the Navy's responses to EPA comments can only be evaluated after review of additional information that will be presented in the Draft Final version of the Addendum, such as tables summarizing analytical data from each of the sites. Additionally, the Navy's rationale for a No Further Action (NFA) determination at Marriage Road Ditch, North Patrol Road Ditch, and within several exposure areas evaluated for human health risks, does not appear to be sufficient.

Please contact me if you have any further questions on this or any other matter. We appreciate the opportunity to provide comments to you on this project.

Sincerely,

A handwritten signature in blue ink that reads "John A. Hamill".

John A. Hamill
Acting Remedial Project Manager

cc: Lyn Suer, RWQCB
Michelle Schutz, EPA
Don Chuck, NASA
Dennis Mishek, RWQCB
Jim Hass, USFWS
Lenny Siegel, RAB
Dr. James McClure, RAB
Tom Mohr, RAB

**Evaluation of Navy Response to Comments on the Draft Addendum to the Revised Final
Stationwide Feasibility Study, No Further Action Sites
Moffett Federal Airfield, California**

GENERAL COMMENTS

1. The response to this comment appears to be adequate, pending review of the additional text that will be included in the Draft Final version of the report.
2. The response to this comment appears to be partially adequate. The response states that all requested information was provided in Table 1, which will be referenced in the document. However, Table 1 does not provide sufficient information to address the comment. For example, Table 1 does not describe why the Weapons Storage Bunkers were not evaluated for human health risk under a residential or recreational scenario. The summary of each site proposed for no further action (NFA) should provide additional information regarding the identification and evaluation of human health and ecological receptors.
3. The response to this comment appears to be adequate, pending review of the additional text that will be included in the Draft Final version of the report.
4. The response to this comment appears to be adequate. The Draft Final version of the report should include this information describing the Record of Decision for groundwater in Operable Unit 5.
5. The response to this comment does not appear to be adequate. The response states that action levels for PAHs are based on EPA Preliminary Remediation Goals (PRGs), but does not specify which PRGs (e.g., residential, occupational) were used as action levels. Further, the response implies that PRGs for industrial sites were used as the action levels for soils. If the action levels were based on PRGs for industrial use, these sites may require an institutional control to prevent future residential use. Further information regarding PAH detections at the NFA sites should be included in the Draft Final version of the report.
6. The response to the comment appears to be adequate, pending review of the additional text that will be included in the Draft Final version of the report.

SPECIFIC COMMENTS

1. The response to this comment appears to be adequate.
2. The response to this comment appears to be adequate.
3. The response to this comment appears to be partially adequate. It is appropriate to evaluate Golf Course Fill Area 3 as "upland soil" habitat. However, risk to ecological receptors exposed to upland soils has not been appropriately summarized in the Draft Final version of

the report (General Comments 1, 2, and 6). The response appears to be adequate, pending review of the additional information that will be included in the Draft Final version of the report.

4. The response to this comment appears to be adequate.
5. The response to this comment is partially adequate. The Navy should provide additional information regarding the two human health exposure areas in the Draft Final version of the report.

However, the second paragraph of the Navy's response is confusing. The response states, "the values listed in the Total Hazard Index and Total Cancer Risk columns for Exposure Area 4093 should be reversed... no cancer risk was identified". This information is inconsistent with the text summarizing the human health risks, which refers to Exposure Area 4093 and states, "the cancer risk is a result of Aroclor 1260". Please resolve this discrepancy. To resolve this discrepancy, it is important that the Navy provide summary tables of analytical data for each site recommended for NFA, as requested in General Comment 3.

6. The response to this comment appears to be adequate, pending review of the additional information that will be included in the Draft Final version of the report.
7. The response to this comment does not appear to be adequate. The comment requests clarification regarding the assessment of ecological risk due to chemicals detected in soil in this area. The response does not address whether ecological risk was evaluated at this site. Please provide information in the Draft Final version of the report that describes how ecological risk due to Aroclor and nickel detected in soil in this area was evaluated.
8. The response to this comment, provided that the additional information is included in the Draft Final version of the report.
9. The response to this comment appears to be adequate, provided that revised Figure 4 is included in the Draft Final version of the report.
10. The response to this comment is not adequate for several reasons.

Protection of Aquatic Life

First, the response does not discuss how the Navy plans to comply with ARARs, given that chemicals at concentrations in excess of promulgated Water Quality Criteria were measured at Marriage Road Ditch. The results of surface water bioassays do not address these measured exceedances with regard to ARARs, and the Navy is erroneous in relying upon the results of the bioassays as the sole rationale for concluding that no further action is necessary at Marriage Road Ditch.

Second, because "no attempt was made to identify the dissolved fraction" of chemicals in surface water, the Navy does not have evidence to argue that "the risks are likely to be

significantly overestimated" using total chemical concentrations. EPA does not concur that risks due to exceedence of a promulgated standard are "likely to be overestimated" using total chemical concentrations.

Third, bioassay results from Site 25 do not provide an acceptable line of evidence regarding risks to aquatic receptors at Marriage Road Ditch.

Surface Water Quality

The response states that elevated concentrations of metals in the ditch would be detected through NASA's water monitoring program. However, it is not clear whether NASA's monitoring was being conducted at the time when samples were collected in preparation for the Site Wide Ecological Assessment, when exceedences of Water Quality Criteria were measured at this site.

Soil/Sediment

The response argues that detected concentrations of PCBs in Marriage Road Ditch do not exceed, "the RAO". It appears that the Navy is referring to the Remedial Action Objective for Site 25. However, this site-specific RAO at Site 25 is not applicable to conditions at Marriage Road Ditch, where presumably water flows year round. One of the conditions for the RAO at Site 25 is that this site does not support fish due to seasonal drying.

Since PCBs were detected at elevated concentrations in sediment at Marriage Road Ditch, and exceedences of promulgated Water Quality Criteria were measured at this site, the Navy should provide further rationale (and/or interpretation of existing data) to support an NFA determination.

11. The response to this comment does not appear to be adequate. The Navy should clarify whether chemical detections in surface soil at these human health exposure areas were evaluated in the ecological risk assessment for upland soil.
12. The response to this comment appears to be adequate, pending review of the additional information that will be included in the Draft Final version of the report.
13. The response to this comment does not appear to be adequate. The response states that human health exposure area 3974 is on Site 22, Golf Course Landfill 2. However, in the revised Figure 2 distributed as part of the Navy's response to comments, this exposure area (even the northwestern corner of the exposure area, where PCBs were reportedly detected from Sampling Location SBGC2-11) does not appear to be within the boundaries of Site 22. Further, the preferred alternative for remedial action for Site 22 does not include removal of soil at the border of the site. Please provide additional clarification regarding how the remedial action at Site 22 will address this soil contamination. Alternatively, please clarify why the Navy believes that a noncancer risk (Hazard Index) of 4.9 and a noncancer

risk of 5.2E-04 to the occupational receptor is considered acceptable.

14. The response to this comment appears to be adequate.
15. The response to this comment does not appear to be adequate. The response states, “if residential development were to take place, the North Patrol Road Ditch would be filled before residences could be built..”. If the ditch must be filled in order to make the property acceptable for residential use, an institutional control is necessary. An institutional control constitutes an action. Therefore, the Navy’s designation of this site for no further action is not clear. Further rationale is necessary to support an NFA determination.
16. The response appears to be adequate, if the Navy provides the additional information from the response in the Draft Final version of the report.