



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

N00296_004282
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: Review of the Draft Proposed Plan for Site 25, Moffett Federal Airfield, dated April 2001.

Dear Ms. Muckerman:

Attached please find EPA's comments on the Draft Proposed Plan for Site 25. Several changes to the Proposed Plan are necessary before the plan is finalized, including a more detailed description of the hydrologic regime at the site, a clear description of institutional controls that will be enacted as part of the remedy, and more detail regarding further sediment sampling and other activities that will occur during the construction (Remedial Design/Remedial Action) phase of the project.

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

**Review of the Draft Proposed Plan for Site 25
Moffett Federal Airfield, California**

GENERAL COMMENTS

1. The report states that a channel will be created between the Eastern Diked Marsh and the stormwater retention pond. Since this has not been previously discussed in the Feasibility Study, the purpose of creating this channel should be discussed. Alternatively, reference to the channel should be removed from the Proposed Plan, and the discussion reserved for subsequent remedial design documents.
2. The Proposed Plan states that confirmation sampling of sediment and surface water will be conducted after excavation to ensure that the remedy has been completed according to the guidelines established in the Record of Decision (ROD); however, only Remedial Action Objectives (RAOs) for sediments are presented. Please revise the Proposed Plan to present the guidelines for surface water (i.e., promulgated state Water Quality Criteria) that will be established in the ROD.
3. The Proposed Plan repeatedly refers to seasonal drying as a “natural process” and states that institutional controls will be enacted “to ensure that the ecosystem functions as it has in the past”. However, the term “natural processes” is misleading. Whether seasonal drying (or any part of the current hydrologic regime) of the stormwater retention pond is a “natural process” is subject to debate, since this area was probably a natural tidal wetland prior to its use by humans as a diked pond. The text should be revised to reflect that seasonal drying will continue to occur to ensure the protectiveness of the remedy to ecological receptors.

Additionally, the report should include a “site characterization” section that describes the natural functions of this habitat. For example, Dr. Keith Miles of the U.S. Geological Survey has conducted numerous wildlife surveys (as cited in the Feasibility Study) that could be summarized in the Proposed Plan. Alternatively, a previous version of the Draft Proposed Plan distributed to the regulatory agencies in October 1999 (prior to finalization of the Feasibility Study) contained the following text, which could be incorporated into the current Proposed Plan:

The Eastern Diked Marsh is seasonally saturated but rarely covered with fresh stormwater. The stormwater retention pond is seasonally covered by 1 to 5 feet of stormwater, but is usually dry in the late summer and fall. The Eastern Diked Marsh functions as an upland habitat during late summer and fall, but provides wetland habitat during other seasons. The area is currently covered with a mixture of salt-tolerant plants such as pickleweed and other species such as cattails. The marsh provides habitat for several species of insects including mosquitoes, damselfly nymphs, and midge fly larvae. Pickleweed and widgeon grass grow on the shoreline of the stormwater retention pond. Blue-green algae grow in the pond. The Eastern Diked Marsh and stormwater retention pond provide habitat for bird feeding and nesting. Both waterfowl (for example mallard ducks and American coots) and shorebirds (for example black-necked stilts, American avocets, and dowitchers) feed or nest there.

SPECIFIC COMMENTS

1. **First bullet, Page 1:** The text states that sediment will be removed above “limits considered safe for the most sensitive ecological receptors”. Since RAOs were derived with consideration given to factors in addition to that of protecting avian ecological receptors (i.e., ambient levels in San Francisco Bay, which may not in fact be safe for the most sensitive ecological receptors), the text should be revised to reflect that the limits were developed with consideration given to protection of populations of birds, which are considered the most sensitive ecological receptors to use Site 25.
2. **Fourth bullet, Page 1:** The text states that a streambed for freshwater flow will be created. Since this aspect of the remedy has not been previously discussed in the Feasibility Study, the purpose of creating this channel should be discussed.
3. **Fifth bullet, Page 1:** The text states that institutional controls will be enacted to ensure that “natural processes are not disrupted and occur in the ecosystem as they have in the past”. The term “natural processes” is misleading. Whether seasonal drying (or any part of the current hydrologic regime) of the stormwater retention pond is a “natural process” is subject to debate, since this area was probably a natural tidal wetland prior to its use by humans as a diked pond. The text should be revised to reflect that institutional controls will ensure that the stormwater retention pond and Eastern Diked Marsh are used for flood control (as they have been for the last 50 years), and to ensure that use of the site by birds and other ecological receptors remains the same. Additionally, the institutional controls (i.e., seasonal drying and maintenance of the sediment settling basin) should be specified here.
4. **Site History, Page 2:** The text in the third paragraph describing the sediment settling basin is confusing. The section describing how the area became contaminated should be presented prior to the description of the NASA sediment settling basin.
5. **Figure 2, Site Map, Page 3:** The figure is so small that it is difficult to read. Please enlarge the figure.
6. **Human Health Risk Scenarios, Pages 3 and 4:** The text states that three risk scenarios were assessed: residential, recreational, and occupational. However, the text on page 4 then states that risks to residents were not evaluated. Please revise the Proposed Plan to correct this discrepancy.
7. **Human Health Risk Scenarios, Page 5:** The text states that unacceptable carcinogenic and noncarcinogenic risk was identified in some areas of Site 25, yet cleanup goals were developed for ecological receptors. The text goes on to state that “cleanup goals established to protect ecological receptors are also protective of human health”. However, the text does not clearly specify which human health receptors the cleanup goals will protect (i.e., just occupational receptors?). Please revise the text to clearly state whether the cleanup goals (designed to be protective of ecological receptors) are protective of all human receptors.

8. **Figure 3, Site Plan, Page 4:** It is not clear whether sediment and surface water samples were collected for the entire stormwater retention pond and Eastern Diked Marsh areas or only from the four smaller areas shown on Figure 3. For clarity, please revise the Proposed Plan to indicate how many samples were collected and from which areas of Site 25.

Additionally, it is not clear which area(s) comprise the stormwater retention pond shown on Figure 3, and it is also unclear what the dots on Figure 3 represent (e.g., sediment samples?). The existing dots on the figure do not appear to represent all sample locations at Site 25. Please clarify the information presented on Figure 3.

9. **Summary of Remedial Alternatives, Page 7:** The Proposed Plan indicates that additional sediment testing would occur prior to excavation; however, it is not clear whether additional testing would be conducted over the entire area or only in the four small areas shown on Figure 3. Additionally, it is not clear whether this additional testing is intended to define the lateral or vertical extent of contamination. Please clarify where additional sediment testing would be conducted.
10. **Figure 4, Excavation and Backfill details, Page 7:** The figure is so small that it is difficult to read. Please enlarge the figure.
11. **Alternative 2, Page 7:** The term “federally listed species” is confusing. Please revise the text to refer to “threatened and endangered species”. Additionally, please include a definition of “threatened and endangered species” in the glossary.
12. **Alternative 2, Page 7:** The description of Alternative 2 describes the disposal of impacted sediments; however, the disposal of existing vegetation is not described. Since vegetation may be contaminated, please revise the Proposed Plan to indicate how removed vegetation will be disposed of.

The text in the final paragraph on page 7 states that backfill “may be treated to control weed species”. Treating soil/sediment with herbicide does not appear to be practical for a site on which 1) pesticides are one of the chemicals of concern, 2) minimization of habitat impacts is a concern, and 3) replanting will be conducted on the backfilled areas. Please clarify what kind of “treatment” is intended, or remove the statement from the Proposed Plan.

13. **Alternative 2, Page 8:** The text in the first paragraph on page 8 states that a small water channel between the Eastern Diked Marsh and stormwater retention pond will be created. The purpose of creating this channel is not clear, nor has it been previously discussed as part of the remedy. Please describe the purpose of this channel, or remove this statement from the Proposed Plan.
14. **Alternative 2, Page 8:** The text states, “a biological monitor would be present during... construction activities”. The text should be clarified as follows: “A trained wetland biologist would be present to monitor all onsite construction activities”.

15. **Alternative 2, Page 8:** The Proposed Plan indicates that a sediment basin is in place to prevent impacted sediment from reaching the Eastern Diked Marsh; however, it is not clear how contaminants present in stormwater will be addressed. Please revise the Proposed Plan to indicate whether stormwater sampling and/or treatment will be conducted to ensure that the habitat remains suitable for wildlife.

16. **Evaluation of Alternatives, Page 11:** The Proposed Plan states that the PCB regulatory limit for unrestricted use (of treated sediment) is 1 mg/kg; however the following sentence states that if the sediment is to be reused at Moffett Federal Airfield after treatment, the PCB concentrations must be less than the selected RAO (which is 470 µg/kg). These statements appear to be contradictory. Also, the Proposed Plan does not discuss lead, zinc, and DDT concentrations with respect to reuse of treated soil. Please revise the Proposed Plan to clarify the requirements for reuse of treated soil at MFA.

17. **Table 3, Comparative Evaluation of the Remedial Alternatives:** A note to the table states that “the remaining two criteria will be evaluated after the Public Comment Period”. For clarity, please list the remaining two criteria in Table 3.