



California Regional Water Quality Control Board

San Francisco Bay Region



Winston H. Hickox
*Secretary for
Environmental
Protection*

Internet Address: <http://www.swrcb.ca.gov>
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 or FAX (510) 622-2460

N00296_004283
MOFFETT FIELD
SSIC NO. 5090.3.A

Gray Davis
Governor

May 31, 2001

Commander
Attn: Ms. Andrea Muckerman
BRAC Environmental Coordinator
Naval Facilities Engineering Command, Southwest Division
1220 Pacific Highway
San Diego, CA 92132-5190

SUBJECT: 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:

The SF Bay Regional Water Quality Control Board (RWQCB) concurred with EPA's April 23, 2001 comments on the Draft Addendum to the Final Stationwide FS, No Further Action Sites. RWQCB Staff have completed a review of the Navy's response to EPA's comments, as well as EPA's May 24, 2001 evaluation of the Navy's responses.

We concur with EPA's May 24, 2001 evaluation of the subject document and are particularly concerned that there is not sufficient information for a No Further Action (NFA) determination at Marriage Road Ditch and North Patrol Road Ditch. Surface water quality has not been adequately characterized, because dissolved metal concentrations were not measured during the RI Phase. NASA's receiving water monitoring under their NPDES permit is not adequate for characterizing extent of contamination and risk.

A similar lack of data existed for Site 25. At that site the Navy and agencies agreed that water quality sampling, to determine compliance with Ambient Water Quality Criteria, would be conducted during the construction phase of remediation. Since the Navy is not proposing remediation at Marriage Road Ditch and North Patrol Road Ditch, then water quality samples should be analyzed to determine compliance with water quality objectives, before an NFA determination can be made.

We are also concerned that the next iteration of this document, which is the Draft Final, will include a large amount of additional information, not previously reviewed by the agencies. We suggest that the Navy forward the proposed revisions for agency review prior to producing the Draft Final. Hopefully, this will streamline the process, so that additional iterations will not be needed.

California Environmental Protection Agency

If you have any, please contact me at (510) 622-2390, e-mail: dam@rb2.swrcb.ca.gov , Lynn Suer at (510) 622-2422, als@rb2.swrcb.ca.gov, or Adriana Constantinescu at (510) 622-2353, ac@rb2.swrcb.ca.gov.

Sincerely,

Dennis Mishek, Sr WRCE
Section Leader, DOD/DOE

cc:

Mr. John Hamill, USEPA
Ms. Sandy Olliges, NASA
Mr. James McClure, RAB
Mr. Peter Strauss, RAB
Mr. Kevin Woodhouse, City of Mountain View
James Boarer, MEW Co. Representative