

Former McClellan Air Force Base



**LRA Initial Parcel Record of Decision #1
Responses to Regulatory Agency Comments**

Data Item No. A001B; SOW Paragraph No. 9.7.5

**Project No. PRJY20027222
Contract No. F41624-03-D-8595**

Task Order 29

**Prepared for
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13. ABSTRACT (Maximum 200 words) This document provides the responses to regulatory agency comments on the draft and draft final LRA Initial Parcel Record of Decision #1. The Record of Decision documents the selected remedy for seven sites within the Initial Parcel at the former McClellan Air Force Base. The sites are PRL S-014, PRL S-033, PRL S-040, SA 003, SA 035, SA 041, and SA 091. The selected remedy addresses non-volatile organic compounds in soil.				
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**Response to Comments on the
Draft Final Document**

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	Responses to Comments					Specific Comment 3:	The response addresses the comment and has been incorporated into the text. However, the last sentence of the first paragraph in Section 1.4.1 (page 1-4) still refers to remedies associated with other programs and RODs at McClellan. As they have no relevance to the remedies selected in this IP ROD, it is recommended that the sentence be deleted so that the paragraph ends with the phrase "costs to achieve the same risk reduction using treatment are significantly higher."	As suggested the last sentence of the first paragraph to Section 1.4.1 has been deleted.
2.	Responses to Comments					Specific Comment 5:	The response addresses the comment and has been incorporated into the text. However, as the first paragraph of this section discusses remedies and sites not addressed in the IP ROD, it is confusing and we recommend that it be deleted.	As suggested the first paragraph of Section 2.3.4 has been deleted.
3.	Responses to Comments					Specific Comment 6:	The response addresses the comment, however, minor differences were noted between the text that the response indicates is in the ROD and the actual revised text on pages 2-24 and 2-25 (i.e., the text in the ROD states that five samples were collected from three borings "prior to 1997."). Please revise either the response or the ROD.	As noted, the text in the RTC table omitted the text, "prior to 1997". The RTC should read, "VOCs analyzed by TO-14 were reported in five samples collected from three borings prior to 1997."
4.	Responses to Comments					Specific Comment 12:	The response appears to address the comment, but was not completely incorporated in the text. While revision of the risk assessments is not required, the discussion in the uncertainty analyses in Appendix A should clearly note which toxicity criteria have changed and whether the revised value is more or less stringent.	The uncertainty analyses in Appendix A for PRL S-014, SA 035, and PRL S-040 were revised to clearly note which VOCs have had changes in toxicity values since the HHRAs were prepared, and if the new value is more or less stringent than the value used in the HHRA.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	General						<p>There appear to be discrepancies in the exposure scenarios evaluated in the human health risk assessments for each site. For some sites both residential and occupational future land-uses were evaluated, while only residential reuse appears to have been evaluated for others. While we presume that this reflects revisions to the risk assessment process at McClellan AFB over the years, a brief explanation for each site in Section 2 and in Appendix A would be helpful for clarification.</p>	<p>Both residential and occupational exposure scenarios were evaluated for PRL S-014, PRL S-040, SA 035, and SA 091. The risk results for the residential and occupational scenarios for each of these sites are presented in the text of Appendix A. The risk summary tables in Appendix A present the results for both residential and occupational scenario for PRL S-014, SA 035, and SA 091. Because there are a large number of chemicals evaluated for PRL S-040 and risks for the occupational scenarios were below USEPA's risk management range, only the residential results are presented in the risk summary tables for PRL S-040. This approach is consistent with USEPA ROD guidance that states the primary focus of the risk assessment summary should be on those exposure pathways found to pose actual or potential threats to human health.</p> <p>For PRL S-033, only the residential risk results are presented in the Draft Final ROD. These risk results were originally presented in the Removal Action for PRL S-033 and represent residual risks after a removal action was completed. Residential PRGs were used as cleanup goals for the removal action.</p> <p>Text was added to Section 2 and Appendix A to explain the differences in scenarios noted above.</p>
2.	General						<p>The figures in Appendix A should be consistent in the amount of information presented. While some of the figures display locations that were sampled during the Initial Parcel Data Gaps Investigation (e.g., PRL S-014), others (e.g., SA 041) show no sampling locations. This is confusing and often leads to the erroneous impression of inadequate site characterization. Please consider revising the figures to be more consistent.</p>	<p>There are no figures in Appendix A. Therefore, changes were made to figures presented in Section 2 and Appendix B of the ROD. RI sampling locations were added, where possible, and screened back on the figures.</p>
3.	General	2.9					<p>Since the information presented in Appendix A is intended to summarize the results of the risk assessments, the discussions of the basis for action or no-action are inappropriate and should be reserved for the remedy selection in Section 2.9 of the ROD.</p>	<p>As suggested, the text discussions of the basis for action or no-action have been deleted from Appendix A and have been integrated into Section 2.9.1 of the ROD.</p>
4.	General						<p>It is recommended that, at least for future documents, the column in the tables in Appendix A titled "Statistical Measure" be renamed "Basis for Exposure Point Concentration" or something similar to more accurately reflect the information presented.</p>	<p>As suggested the column header for tables in Appendix A will be revised from "Statistical Measure" to read, "Basis for Exposure Point Concentration" in future documents.</p>

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	Specific	2.4.1.4	2-23			PRL S-014	The text in the third paragraph should be revised such that reported concentrations of arsenic are compared to the combined background value for soils at McClellan, not the maximum reported concentrations in the background data set. In addition, the locations where the highest detections of arsenic by Method SW7060 should be identified.	<p>Since the first sentence of the paragraph already makes the comparison to the combined background concentration for arsenic, there is no need for the last sentence in the paragraph and thus it has been deleted to eliminate the confusion.</p> <p>As suggested the locations where the highest detections of arsenic were found by method SW7060 has been added to the text. The sentence now reads, "The maximum reported concentrations were 7.1 and 7.4 mg/kg from 10-foot-deep samples collected adjacent to a former fuel pump island and a former washrack, respectively. These two soil borings were approximately 60 feet apart."</p>
2.	Specific	2.4.1.4	2-23			PRL S-014	Please clarify whether the locations where cadmium was analyzed by Method SW7131 were co-located with the high concentrations noted by Method SW6010.	As suggested clarifying text has been added to describe the location of the cadmium samples analyzed by method SW7131 vs the location of the samples analyzed by SW6010. The text has been revised as follows, "Similarly, cadmium was reported in four samples, from a single hand-auger boring, (analyzed by Method SW6010) to a maximum concentration of 9.7 mg/kg. However, samples collected from a soil boring approximately 30 feet away, (analyzed by SW7131) reported no hits above the combined background concentration of 0.4 mg/kg."
3.	Specific					Figure 2-6 PRL S-014	Site Features Map: This figure presents just the locations of the most recent data gap sampling effort, rather than the location of all soil borings at PRL S-014. Without these locations, the area south of Building 22 appears to be inadequately characterized, which is not the case. Further, much of the discussion presented in Section 2.4.1.4 is without context in the absence of sampling locations. It is recommended that the figure should present the location of all soil borings at PRL S-014	RI sampling locations outside of the excavation area were added on the figure.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
4.	Specific	2.4.1.7	2-27				Human Health Risk Assessment Uncertainties, Page 2-27: The statement here and in Section A1.5 needs to provide sufficient information to support the (apparent) decision for no action for the area south of Building 22. Estimated cancer risks are in the range of 10-5 to 10-4 due to the detected concentrations of arsenic, yet no information is provided as to whether risks associated with arsenic are either overestimated or the result of background concentrations. The Air Force indicates that it intends to collect samples from the area where hazardous wastes were stored, but there is no information provided as to whether the areas where arsenic was detected by Method SW7060 at concentrations exceeding the combined background value will be investigated further. Please clarify the discussions of the area south of Building 22.	The last bullet of Section 2.4.1.7 (Uncertainties) has been revised as follows: Arsenic was detected at concentrations that appear greater than the "combined" background concentration at selected locations, primarily in samples analyzed by Method SW6010. These SW6010 data were not used for the risk assessment. The maximum reported concentrations of arsenic by the preferred analytical method, Method SW7060, are less than the maximum reported concentrations by Method 7060. In addition, the sporadic elevated concentrations are not indicative of a contaminant source. Therefore, the risk associated with arsenic at this site may be representative of background. The last bullet of Section A1.5 has been revised similarly.
5.	Specific	2.4.2				PRL S-033	This site does not include a data table as was provided for the other sites. Please consider providing a data summary table for this site similar to what has been provided for the other sites.	A data table was added to the site map for PRL S-033 which includes the soil boring identification, the boring depth, and corresponding concentrations of PAHs. The concentrations represent the post excavation confirmation sample results.
6.	Specific					Figure 2-7 PRL S-033	Site Features Map: It appears that several sampling locations for this site are not presented on this figure. The text notes data from boring locations that are not shown on this figure. It is recommended that these locations be added to the figure.	RI sampling locations were added, where possible, and screened back on the figures.
7.	Specific	2.4.2.7	2-32			PRL S-033	Human Health Risk Assessment, Page 2-32: For clarity, it would be helpful here to provide an explanation why only residential exposure was evaluated for this site, as various occupational scenarios were also evaluated for the other sites in this ROD.	Please refer to text changes as noted in General Comment 1.
8.	Specific	2.4.2.7	2-32			PRL S-033	Human Health Risk Assessment, Page 2-32: The statement that metals and VOCs were not evaluated in the risk assessment because they "were not within the exposure area" needs to be revised to note that (at a minimum) concentrations of metals present are representative of background and/or do not pose a significant risk to human health and the environment. Stating that they were not within the exposure area and that data collected from outside the footprint of the excavated area only implies that the exposure area may be incorrectly defined.	As suggested, the sentence has been revised to read, "Metals and VOCs were excluded from the assessment, as VOCs were not COCs, and concentrations of metals present are representative of background."

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
9.	Specific	2.4.3.3	2-40			SA003	For clarity, please provide an explanation how detections of hexavalent chromium can be less than screening levels for the protection of human health but "contribute to human health risk" based on the risk assessment.	The phrase "...but do contribute to human health risk based on the OU B RICS Addendum Human Health Risk Assessment" was deleted from the last paragraph of the metals subsection in Section 2.4.3.4. In the OU B RICS Addendum HHRA, hexavalent chromium was evaluated for carcinogenic effects using an oral slope factor and an inhalation slope factor. Therefore, hexavalent chromium was a main contributor to potential cancer risks by the ingestion route of exposure. The screening levels and preliminary cleanup goals for the IP FS were calculated for hexavalent chromium using an inhalation slope factor for carcinogenic effects but not an oral slope factor. This methodology was used for the IP FS because neither USEPA or California EPA currently provide an oral slope factor for hexavalent chromium and do not identify hexavalent chromium as a carcinogen through oral exposure.
1.	Errata		2-15			Last Paragraph	Please change "acceptable" to "appropriate".	As suggested, the word, "acceptable" has been changed to "appropriate" in the last paragraph.
2.	Errata		2-27 A1.6			PRL S-014	Basis for Action: Please change the first sentence to: "The risk estimates for PRL S-014 North exceed a hazard indices of 1 and" ...	As suggested, the text in Section 2.4.1.7 and 2.9.1 (see General Comment 3) has been revised to read, "The risk estimates for PRL S-014 north exceed a hazard indices of 1 and the EPA's threshold of acceptable risk (i.e. the excess cancer risk exceeds 1x 10 ⁻⁶ for the residential scenario) due to the presence of PCB-1260 in soil."
3.	Errata	2.4.3				SA003	It is recommended that the text in this section clarify that the wash rack is no longer in use.	As suggested, the text has been revised to specify that the washrack is no longer in use. "The hazardous waste storage area and washrack were used to support civil engineering construction and maintenance activities, but are no longer used."
4.	Errata	2.4.3.3	2-34			SA003	The first sentence in the second paragraph should be revised to clarify that the location of the excavation is unknown.	The sentence has been revised as follows, "In addition, an excavation at an unknown location was performed in 1993 to remove surface soils impacted with inorganic species."
5.	Errata	2.4.4.4	2-43			SA035	Revise the sentence in the second paragraph which discusses arsenic results from SA35SB001. As written, it is not clear which value represents the sample result and which represents the combined background.	As suggested the text describing the arsenic detections has been revised to read, "The reported arsenic concentration exceeded the McClellan "combined" background concentration for arsenic of 5.8 mg/kg. However, a sample taken in the same boring at 3 feet bgs measured 3.2 mg/kg, well below the combined background concentration."

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
6.	Errata		2-56			SA091	Basis for No Action: Please reword to: "The risk estimates for SA 091 soil are at the lower end of the target risk range of 10-4 and 10-6, and"	As suggested the text has been revised as follows, "The risk estimates for SA 091 soil are below the EPA's target risk management range of 10-4 and 10-6, and no threats to groundwater or surface water quality are present."
7.	Errata		2-77 2-78			First Two Bullets	Please delete all references to institutional controls, here and throughout the text.	As suggested the text has been revised to delete the references to Institutional Controls as a part of the ROD remedies.
8.	Errata						Please correct the text in each section in this appendix to note that the exposure point concentration represented the lower of either the maximum reported value or the upper 95th percent confidence limit on the (arithmetic) mean, not the 95th percentile upper confidence limit as stated.	As suggested the text in each section of the appendix has been corrected to note that exposure point concentration represented the lower of either the maximum reported value or the upper 95th percent confidence limit on the (arithmetic) mean.
9.	Errata						The units for cancer slope factors in each table in this appendix should be per mg/kg-day [mg/kg-day-1], not (mg/kg-day)-1 as presented.	As suggested, the cancer slope factor units have been revised to read per mg/kg-day.
10.	Errata		A2-3 2-33				Basis for No Action: Please change text to same wording on pg. 2-33.	As suggested the text in Section 2.9.1 (see General Comment 3) has been revised to match the text on page 2-33.
11.	Errata		A1-4				The word "north" should not be capitalized in the sentence on the middle of the page that reads, "The sole known contaminant to the North is..."	As suggested, the word, "North" has been changed, to "north".
12.	Errata		A1-6				Aroclor is a trade name and should be capitalized in the last bullet and in all the tables.	As suggested the word Aroclor has been capitalized wherever it occurs in the document.
13.	Errata		A2-1				There should be a space between "39" and "confirmation samples" in the first sentence.	As suggested, the space has been added to the first sentence.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: U.S. EPA – Viola Cooper

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	General						Response to Paul Green's comments, paragraph 1. Change "sets the guidelines the Air Force must follow to conduct environmental cleanup at McClellan" to "the requirements on how investigation and cleanup are to be completed".	Change has been made.
2.	General						Response needs to address the shift of McClellan cleanup program from purely cleanup, to cleanup and reuse, by adding the following text, "The cleanup program at McClellan is evolving from purely cleanup, to cleanup and reuse. As the program evolves and progresses, priorities shift and schedules change. This can largely be attributed to new information. The Air Force must first completely identify and quantify the scope of the contamination at an IRP site and evaluate various cleanup alternatives before it can arrive at a final cleanup solution, or a Record of Decision in CERCLA terms. A Record of Decision is a key step in the process of transferring property."	Text has been added.
3.	General						Add more detail about progress made to support reuse and progress made to transfer property.	Added the text, "To date, more than 5,000 jobs have been created at McClellan and nearly 80% of McClellan is available for reuse via lease. The Air Force has deeded 275 acres to the community, with an additional 96 acres scheduled to be transferred in Spring 2004 under the Initial Parcel Finding of Suitability for Transfer (FOST)."
4.	General						Response needs to incorporate the following text, "The Air Force has installed many remedies throughout the base that are actively cleaning up sites and ensuring that human health and the environment are being protected. Examples include ongoing groundwater treatment, soil vapor extraction and soil excavation. These ongoing cleanup remedies not only set the stage for future property transfer, but also help current reuse efforts by containing, reducing and eliminating potential risks associated with the contamination."	Text has been changed and added.
5.	General						Response to Paul Green needs to address the fact that the Air Force chose the most cost effective cleanup alternative for SA 003.	The last paragraph of the response to Paul Green has been changed to, "For this Proposed Plan, the Air Force has chosen the most cost-effective cleanup alternative for sites SA 003 and PRL S-014. Alternative 2 is more expensive than removing the contamination due to the cost of institutional controls (managing the contamination left in place over time). For each of the remaining sites, Alternative 1 was selected, because the Air Force has determined that no cleanup actions need to be taken. There are no cleanup costs associated with this alternative, while allowing unrestricted use of the site."

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: RWQCB – James Taylor

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	Specific	2.4.7	2-56				To avoid confusion in this section, replace the reference to "seven" ROD sites to "six", in the first sentence, to maintain the logic flow with the last sentence in this section.	As suggested, the first sentence was revised to read, "Potential impacts to water quality have been identified at two of the six ROD sites: PRL S-014 and SA-003."

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	General						Because the EPA requested that POL only sites not be part of a CERCLA decision, PRL S-40 was 'excised' from the front portion of this document and placed in an Appendix. The text clearly explains the rationale for this action. However, this results in confusion because the document title identifies seven sites and the text (beginning with sections following Section 1.4) repeatedly refers to six sites in this ROD. We believe that the title needs to be consistent with the text and so should be changed from "(7 Sites)" to "(6 Sites)".	The title will remain 7 Sites because it is important to acknowledge that 7 sites on McClellan's site list are being addressed including site PRL S-040, which is a no-action site under CERCLA.
2.	General						Only some sample locations are shown on some of the "Site Features" figures for the individual sites. To minimize confusion, please clearly explain to the readers why this is done.	Site maps have been updated to include historic data from previous investigations, where possible.
3.	General	2.4.1.7 2.4.2.7 2.4.4.7 2.4.6.7					While we recognize the need for the extensive changes made from the draft IP #1 ROD to streamline the document, the changes have resulted in inconsistencies in how the Human Health Risk Assessments (HRA) for the individual sites are presented. The HRA for PRL S-014 (Section 2.4.1.7) is very thorough at summarizing the various scenarios. However, only a very limited amount of HRA information is summarized for PRL S-033 (Section 2.4.2.7) and different depth intervals are presented compared to PRL S-014. Almost no information is presented for SA 003 (we think because the HRA is incomplete for this site). The HRA information for SA 035 (Section 2.4.4.7) is thorough and similar to that presented for PRL S-014, but the HRA for SA 091 (Section 2.4.6.7) is very brief, somewhat similar to that for PRL S-033. Please make the presentations consistent. We believe implementing the recommendations made in HERD General Comment 3 will achieve the goal of clear, consistent risk assessment summaries.	Based on the information available, not all HHRAs could be equally presented. However, all baseline risk assessments presented in the IP ROD #1 were prepared in accordance with the OU A risk assessment methodology. The HHRAs for PRL S-014 and SA 035 are more extensive because more COCs were identified and more data were available for the sites as compared to the other sites. Furthermore, there are two exposure areas at PRL S-014, with the risk characterization performed and reported separately for each. The risk assessment for SA 091 is more concise because there were a limited number of COCs identified at the site. As noted in the comment, the HHRA for SA 003 is considered incomplete because of data gaps. Thus no HHRA data was presented for this site. For PRL S-033, the risk assessment results are not from the baseline risk assessment. Instead, the risk results originally presented in the Removal Action Report were summarized in the ROD. Only the residual risk for the residential scenario after the removal action was completed was calculated. The depth interval was determined by the maximum depth of excavation. Editorial changes to the risk summary sections have been made to make the format of each section more consistent. In addition, text has been added to each section per EPA General Comment 1 to explain what exposure scenarios were evaluated for each site. Finally, text was added as described in the response to General Comment 4 to address the risk associated with groundwater more consistently across the sites.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
4.	General	2.4.6.7					Groundwater risk should be consistently presented for each site. It was added to the risk discussion for site SA 91 (Section 2.4.6.7) due to our Specific Comment 15 on the draft IP#1 ROD, but should be consistently applied to all sites.	Groundwater risk was added to the text (Section 2 and Appendix A) for those sites that had a risk assessment with a groundwater exposure. Text was added to PRL S-014 (Sections 2.4.1.7 & A1.4), PRL S-040 (Section B1.7.4), and SA 035 (Sections 2.4.4.7 & A3.4). For those sites at which the risk associated with groundwater exposure was not calculated, text was added to explain the reason why.
5.	General		1-2	Third			A phrase that states that DTSC concurs with the selected remedy has been inserted at various locations throughout the text (e.g., Page 1-2, 3rd Ppgh.). Where presented, please excise DTSC from these phrases.	As requested, text indicating DTSC concurs with the selected remedies has been deleted where it appeared in the document. As requested, the following text has been added above the State signature on the ROD signature page, "The State of California, Department of Toxic Substances Control (DTSC) had an opportunity to review and comment on the Initial Parcel #1 ROD and our concerns were addressed."
6.	General						DTSC is currently working with the Local Reuse Authority to resolve our concerns over contamination uncertainties at PRL S-14 and the ROD's designating this site for unrestricted use following PCB cleanup. We anticipate that these issues will be resolved by the time of the scheduled ROD signature date.	Comment is noted, and no response is required.
7.	General						In regards to HERD Specific Comment 9 we believe that due to potentially high levels of VOCs in the shallow soil gas, SA 41 should be evaluated in a VOC ROD.	Comment is noted and the potentially high levels of VOCs in shallow soil gas may be addressed in a future VOC ROD.
1.	Specific						Response to Comments (RTCs)-Kevin Depies (KD), General Comment 2. In our comment we requested information on underground storage tanks at both sites PRL S-014 and SA 35. The response states that this information was added for PRL S-014 and the draft final IP #1 ROD accurately reflects this. However, the RTC does not mention any action in regard to SA 35, nor was any additional information provided for this site as requested.	The following text was added at the end of the second paragraph of Section 2.4.4.1: "However, three screening-level shallow soil gas samples and two soil samples were collected within 20 feet of the former UST location during the RI. Data from laboratory analyses of these samples are discussed in Section 2.4.4.4." Text was added in Section 2.4.4.4 indicating which RI samples were collected adjacent to the former UST. Three soil gas samples and one soil boring were located within 20 feet of the former UST location. These samples were analyzed for VOCs, SVOCs, and metals, and the analytical results are discussed in the appropriate subsections within Section 2.4.4.4.
2.	Specific					RTCs-KD General Comment 4	RTCs-KD General Comment 4. Please note that due to the delay in distributing our final comments on the draft IP #1 ROD, McAFB has responded to our draft comments. We have slightly modified our General Comment 4 on the draft IP #1 ROD. However, we don't believe that the modifications substantially change the meaning of the draft comment.	Comment is noted and no response is required.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
3.	Specific					RTCs-KD Specific Comment 4	The response adequately meets our needs. However, only a small portion of the text in the response was carried into the text of the document. Please add the remaining response text which would satisfy our request in Specific Comment 4.	The last bullet of Section 2.4.1.7 (Uncertainties) has been revised per EPA Specific Comment 4 and now reads as follows: "Arsenic was detected at concentrations that appear greater than the "combined" background concentration at selected locations, primarily in samples analyzed by Method SW6010. These SW6010 data were not used for the risk assessment. The maximum reported concentrations of arsenic by the preferred analytical method, Method SW7060, are less than the maximum reported concentrations by Method 7060. In addition, the sporadic elevated concentrations are not indicative of a contaminant source. Therefore, the risk associated with arsenic at this site may be representative of background."
4.	Specific					RTCs-KD Specific Comment 15	The response states that the groundwater risks have been added to Appendix A, Section 4. However, there is no Section 4 in Appendix A. Please identify where this information has been presented.	Appendix A, Section 4 is "Section A4" in Appendix A of the document. This section is devoted to site SA 091 and the specific text on groundwater risk was added to the "Risk Characterization" in Section A4.4.
5.	Specific		1-3	Second	Second		Please clearly explain what a "COC" is.	A sentence has been added explaining what a COC is: "COCs include a variety of chemicals, compounds, and elements which are present at concentrations which exceed screening criteria for potential impacts to human health and the environment."
6.	Specific	1.4.1 2.3.3	1-4	Second	First Third		Appendix H of the Feasibility Study identifies several contamination uncertainties for PRL S-014. These are consistent with concerns we have previously identified. As mentioned in General Comment 6, above, DTSC is working with the Local Reuse Authority to address property reuse issues in regards to these uncertainties. This comment is also applicable to Section 2.3.3, 3rd Sentence.	Comment is noted, and no response is required.
7.	Specific	1.6	1-5		First		Please change "The following agencies" to "U.S. EPA and the Air Force.	As requested, the sentence has been revised to read: "The USEPA and United States Air Force concur and accept the selected remedy and or remedies as described in this ROD:"

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
8.	Specific		2-13 2-10			Figure 2-4	This figure presents an overall strategy for interaction between RODs and property transfer at McAFB. However, over the past several months this strategy has changed. For example, future non-VOC RODs will now include shallow VOC soil gas. Additionally, the upcoming Parcels A5, A6a, and A6c FOSET does not have VOC sources. In the FOSET, some shallow soil gas uncertainties (from adjacent sites) are being addressed with institutional controls. Accordingly, we think that this figure should be deleted from the IP #1 ROD. We don't think this precludes the need for most of the related text at the top of page 2-10. Please keep this text (except for the Figure 2-4 reference).	As suggested, the figure 2-4 has been deleted from the final version of the document. The related text on page 2-10 has remained.
9.	Specific	2.3.3	2-15		First		Please change "selected" to "six".	As suggested the word "selected" has been replaced by the word "six".
10.	Specific		2-4	Second	Second		Switching to "six" sites as done here leads to confusion. We suggest a qualifier be added such as "non-POL only sites" between "six" and "Initial Parcel". This change should be incorporated at any other locations in the report where this situation arises.	For clarity, the sentence has been revised to read, "A brief summary of the historical operations at the six (CERCLA contaminated) Initial Parcel sites is provided in this section." The change has been incorporated at any other location in the report as suggested.
11.	Specific		2-5	First	Second		Please verify the accuracy of this statement. Approximately one month ago we witnessed tenant occupancy of the southern building on this site.	The tenant, Risse Mechanical, is actually occupying Bldg 54 (Site SA 041), and making only minor use of site PRL S-014 by using Bldg 17 (a small storage shed) for supplies. In light of this, the text for both bullets SA 041 and PRL S-014 have been modified to reflect this current state of occupancy. The sentence for PRL S-014 has been revised to read, "The site is unoccupied except for the use of a small storage shed (Bldg. 17) by a tenant located in Bldg. 54, immediately south of the site." The text for SA 041 has revised to read, "The site is occupied at this time by a lease tenant (Risse Mechanical)."
12.	Specific	2.4.1.3	2-20	Second			A discussion about four samples that exceeded background levels for chromium, calcium, potassium, and sodium that was presented in the draft IP #1 ROD is no longer presented in this section. Please explain why this discussion was dropped.	Text in the second paragraph of Section 2.4.1.3 has been revised to clarify that the four metals referenced in this comment were not detected at concentrations exceeding the normal variance of background based on a statistical analysis of the data during the RI.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
13.	Specific		2-24	Second	Third		We don't believe the term "down-gradient" is applicable here. Please modify the text accordingly.	The term "down-gradient" has been replaced by the text "down-slope with regard to surface water runoff". This reflects that the sample location was partially selected because it was in the most likely flow path of surface water leaving the former hazardous waste storage area. The text now reads, "PCB samples were collected immediately outside and down-slope (with regard to surface water run-off direction) of the former hazardous waste storage area. No samples were collected from beneath the storage area itself. Soil samples from beneath the hazardous waste storage area will be collected and analyzed for PCBs during the remedial design phase."
14.	Specific	2.4.1.5	2-25	Second	First		We suggest you insert "and detected contaminants are relatively immobile" at the end of this sentence.	As suggested, the sentence has been revised to read, "The likelihood of migration to other media is minimal since the contaminated soil is located in the upper 3 feet bgs of the site, and detected contaminants are relatively immobile."
15.	Specific		2-30			Figure 2-7	Please identify what the squares are on this figure. Alternatively, please delete them if they are irrelevant to the subject presented in the figure	As suggested, the three black squares have been deleted from the figure since they are irrelevant to the subject presented in the figure.
16.	Specific	2.7.2	2-64		Third		Please add text explaining why only some of the Alternatives are presented here. The 3rd sentence in the first paragraph doesn't do this.	Since the explanation for why some alternatives were dropped was provided on page 2-57, a sentence has been added here referring the reader back to that page to refresh their memory. Text is modified as follows: "The advantages and disadvantages of the alternatives relative to one another based on the nine evaluation criteria are summarized in this section (see the last two paragraphs of Section 2.6 for why alternatives 4, 6, and 7 were dropped from consideration). Site-specific details were considered when comparing the performance of each alternative. However, not all the chosen alternatives (1, 2, 3, and 5) are evaluated for each site because not all alternatives are appropriate at every site."

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
17.	Specific	2.7.2.1 2.7.2.2 2.7.2.3 2.7.2.4 2.7.2.5 2.7.2.6 2.7.2.7					<p>While we concur with the changes made (from the draft document) to streamline and limit redundant text, these sections now lack structure and parallelism. For most of these sections, the text 'bounces' around between various discussions about alternatives and individual sites. Section 2.7.2.2 comes closest to being presented in a logical and clear format where an individual paragraph discussing alternatives is devoted to each site. On the other hand, Section 2.7.2.1 is confusing because paragraph one generically discusses Alternatives 3A and 5, and then Alternatives 3A and 3B; paragraph two compares Alternative 2 to the other alternatives; paragraph three provides a discussion about protectiveness of Alternative 2, paragraph four discusses how Alternative 1 is a poor choice for sites PRL S-014 and SA 003, and paragraph five discusses how there is no longer a threat at SA 35. A similar level of confusion is apparent in Section 2.7.2.3.</p> <p>Please restructure these Sections so that they are more clearly presented and follow a consistent structure. It might be best to first discuss the impact to the three sites for Alternative 1, then Alternative 2, etc. Or, conversely discuss the alternatives for the first site, then for the second site, and then for the third site.</p> <p>We make this request because we always try to remain cognizant that this document needs to be understood by individuals (the public) who are not as intimate with the program as are McAFB staff/contractors and the regulators. A primary goal of this document is to clearly explain the rationale for how the selected remedy was chosen.</p>	Sections 2.7.2.1 through 2.7.2.7 have been revised to more clearly represent the comparative analysis of alternatives. Text was restructured such that the impact to the three sites for each alternative is discussed.
18.	Specific	2.7.2.1 2.6.2	2-65	Second	Last Two		<p>These sentences are confusing as to where they fit into the section. This is likely due to the 'streamlining' of text discussed in Specific Comment 4 above. We believe you are trying to say that Alternative 2 will not protect groundwater for site SA 003. If so, please add this to the text. But note that based Section 2.6.2, stating this leads to a conflict with the second sentence in this paragraph that states "the overall potential risk to human health...is reduced through institutional controls". This is because Section 2.6.2 doesn't discuss groundwater institutional controls (ICs). To avoid this conflict, further explanation may be needed (e.g., noting that ICs include restrictions on human exposure to contaminated groundwater).</p>	Per Specific Comment 17, this section has been re-written to address the comparative analysis by site. As such, the potential impacts to groundwater at PRL S-014, SA 003, and SA 035 under Alternative 2 are addressed in the first, second, and third paragraphs, respectively, of Section 2.7.2.1.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
19.	Specific	2.7.2.1	2-65	Third			This text appears to discuss Parts 2A, 2B, and 2C as though they are distinct alternatives when they are all part of Alternative 2. We are unable to determine what this paragraph provides to the Alternative comparison. We think, but are not certain that what you are trying to convey is that all three parts of Alternative 2 are important in making Alternative 2 successful at protecting human health and the environment. If so, it may be best to just state this.	Per Specific Comment 17, this section has been re-written to address the comparative analysis by site. As such, this paragraph has been deleted. The importance of the three parts of Alternative 2 is addressed in Section 2.7.2.3 (Long-term Effectiveness and Permanence).
20.	Specific	2.7.2.1	2-66	Third			We recommend that the beginning of this paragraph be consistent with the preceding paragraph by stating outright whether Alternative 1 would or would not reduce the risk to human health. Instead, this is conveyed in a stand-alone one sentence paragraph following the 3rd paragraph.	Section 2.7.2.1 has been revised by taking the only sentence of paragraph 4 from the Draft Final and using it as the 1st sentence of the last paragraph. As recommended, this approach should more clearly state the impact of Alternative 1 on the risk to human health.
21.	Specific	2.7.2.3	2-73	Third	Third		We think this is the first mention of the "layering" of institutional controls. Please elaborate on what this means. At a minimum the IC management plan(s) should be referenced.	As suggested the text has been revised to elaborate on the IC layering concept as follows, "However, the effectiveness of land use restrictions can be strengthened by implementing an IC management plan and by applying mutually reinforcing mechanisms (IC layering strategy); for example, government controls (i.e. AFRPA, Sacramento County, and the state), can be used to zone property for industrial and commercial uses only. This action can be strengthened by applying proprietary controls, which are an aspect of private property law that can be used to restrict or affect the use of property. Common examples include deed covenants or easements restricting future land use or prohibiting activities that may compromise the remedy."
22.	Specific		B-4	Third			The detected metals should be compared to the "combined background" levels as agreed to by McAFB and the regulators.	Text was added to the 3rd paragraph indicating that metals were also compared to the combined background.
23.	Specific	B1.7.6 2.3.1	B-8 2-10	First	First		The use of the phrase "EPA's risk management range" is inconsistent with what is done for the remaining sites and with what has been agreed to by all parties. Please change the text to reflect the agreement discussed in Section 2.3.1, Page 2-10, 1st Ppgh.	The first sentence of Section B1.7.6 (pg. B-8) was revised to read as follows: "The risk estimates for PRL S-040 do not exceed the EPA's threshold of acceptable risk (i.e., hazard indices greater than 1 and the cancer risk greater than 1×10^{-6} for the residential scenario) except for the indoor air pathway".
24.	Specific	B1.7.6	B-8		Last		We believe this statement is incorrect. There is a threat to human health from the (SVOC) compounds present at this site. The only reason for no action under CERCLA is that TPH-only contamination is exempt from CERCLA. Please correct the text to reflect this.	The text has been revised to read, "Hazard Quotients associated with two fuel-related SVOC contaminants, naphthalene, and 2-methyl naphthalene, were 3 and 6 respectively, when the indoor air pathway was included. This fuels-related contamination at PRL S-040 presents a threat to both human health and water quality, however, since fuels-only contamination is exempt from CERCLA, the contaminants will be addressed under State requirements."

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: DTSC – Kris Escarda

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	General						Response to Paul Green's comments need to incorporate evaluation of risk, referencing Mr. Green's question, "What's the significance of 1 ppb?"	Added the text "Cleanup decisions are based on a wide variety of factors, including potential risk to human health and the environment, and a technologic and economic feasibility analysis."

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	General	2.3				Figure 2-3 Figure 2-4	<p>In this section, the text and Figures described overall site cleanup strategy for McClellan (subsection 2.3.1), past removal actions (subsection 2.3.2), activities proposed in the IP ROD #1 (subsection 2.3.3), and future response actions (subsection 2.3.4). It is our understanding that the previous strategy of addressing soil contamination by VOCs separately from non-VOC contamination will be revised. For the pending Initial Parcel Feasibility Studies (IP FS) and Records of Decision for sites in Groups #2 and #3, shallow soil gas contamination (VOCs in the soil interval of 0 to 15 feet below ground surface [ft bgs]) will be included with the evaluation of non-VOC soil contamination. However, the text in the first paragraph on page 2-10 stated that sites with contamination by VOCs in soil that "requires remedial action" are/will be addressed in the VOC ROD and Figure 2-3 indicated that the Basewide VOC FS and Addendum will precede and support the VOC ROD. Investigation and remediation of ground water apparently will continue to address VOC and non-VOC contamination in separate phases of investigation, study, and remedial action. Further complicating the process is the need to report site-specific risk assessments which incorporate all the data collected under different remedial programs.</p> <p>In our interpretation of the information in the IP FS and IP ROD, there are four general categories of VOC sites (without regard to non-VOCs or to ground water):</p> <ul style="list-style-type: none"> • VOCs in vadose zone that do not pose a risk to human health, as evaluated in the multi-chemical baseline risk assessment including indoor air pathway, and do not pose a threat to ground water as evaluated in the remedial investigation leaching model simulations. • VOCs in shallow soil/soil gas that do not pose a human health risk but VOCs in deep soil do pose a threat to ground water. • VOCs in shallow soil/soil gas that pose a potential human health risk but VOCs in deep soil do not pose a threat to ground water. • VOCs in shallow soil/soil gas that pose a potential human health risk and VOCs in deep soil pose a threat to ground water. <p>These site categories can be further described by whether non-VOC contamination is present in soil and by the status of ground water contamination.</p>	See responses to General Comments 1a through 1d below.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1a.	General	2.3.1 2.3.4	2-10 2-15			Figure 2-3 Figure 2-4 First and Third Bullets	<p>Though Figures 2-3 and 2-4 help to clarify the various divisions and interactions of remedial programs, we recommend additional definitions and descriptions to further clarify the process and resolve apparent discrepancies in the text and Figure.</p> <p>The text referred to distinct programs, including "surface soil". The text in Section 2.3.4, p. 2-15, referred to shallow soil at depth less than 15 ft bgs. We recommend that a set of definitions for various soil depth intervals used in the various remedial investigations, feasibility studies, and records of decision, and the bases for the separate intervals, be presented and used consistently in the text and Figures. For example:</p> <ul style="list-style-type: none"> • 0 to 1 ft bgs--Surface soil. Contamination of this interval, typically SVOCs and inorganic chemicals only, evaluated to determine potential impact to surface water. • 0 15 ft bgs--Shallow soil. All contamination in this interval evaluated for human health risks associated with soil and soil gas. Subintervals evaluated in various exposure scenarios. • 0 ft bgs to ground water--Vadose zone. Contamination evaluated for potential impact to ground water. Subintervals might include shallow soil, 0 to 15 ft bgs, and deep soil, > 15 ft bgs. 	<p>To simplify the ROD, Figures 2-3 and 2-4 have been deleted from the final ROD. The relevant text associated with the message of these figures has been retained.</p> <p>To clarify the sentences, the word "surface" has been deleted.</p>

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1b.	General	2.3.1 2.3.4		Second		Figure 2-3	<p>Sections 2.3.1 and 2.3.4. Clarification is needed for the disposition of various categories of sites, particularly for sites with VOC contamination. For the seven sites in this ROD, provide a matrix identifying the documents (i.e., RODs, FOSETs) in which each of the defined program components will be presented. Because Figure 2-3 addressed sites in future FS ROD documents, the matrix might be expanded for inclusion in future documents, identifying for each site or site category the corresponding documents in which non-VOCs in soil and VOCs in soil and/or soil gas and ground water contamination will be evaluated.</p> <p>For example, the second paragraph in Section 2.3.4 explained that VOC contamination in soil that presents a threat to ground water will be addressed in the Basewide VOC ROD, and VOC contamination in shallow soil less than 15 ft bgs will be addressed in a separate ROD that also addressed non-VOC contamination at each site. The matrix should clarify that VOCs at the site will be addressed in two separate ROD documents. In another example, the matrix should clarify whether a site with non-VOC and VOC contamination in shallow soil only, which posed a human health risk, would be addressed only in the IP FS and IP ROD and not the VOC ROD.</p>	Because the structure and organization of future efforts are still being developed, no changes were made to the text. Also see the response to EPA Comment 2 on the Responses to Comments.
1c.	General	2.3.1 2.3.4				Figure 2-3	Describe in the text of Section 2.3.1 or 2.3.4 the estimated numbers of sites anticipated that will follow each of the of the general FS or ROD paths. Also, in the text and Figure 2-3, define the "SSG Breakout FS" and report the number of sites included in that FS.	The number of sites in each of the FS and ROD paths is not known with certainty at this time. Therefore, this information was not added to the text. Furthermore, this information is not necessary to document the remedial action for the sites included in this ROD. The reference to the SSG Breakout FS on Figure 2-3 has been deleted. Also see the response to EPA Comment 2 on the Responses to Comments.
1d.	General		2-10			Fourth Bullet	Explain what is meant by "initial soil cleanup ROD".	The text has been changed to "in this first soil cleanup ROD (i.e., Initial Parcel ROD #1)".
2	General					Figure 2-4	We recommend the following revisions to Figure 2-4. Alternatively, the Figure might be deleted.	As suggested the Figure 2-4 has been deleted from the ROD.
2a.	General						a. Clarify whether total site risk, calculated in the second step for each site, will include risks associated with ground water.	Please see the previous response.
2b.	General					IRP Site 2	For "IRP Site 2", delete "Pb" because HERD currently does not recommend quantitative assessment of cancer risk for lead.	See above.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
2c.	General					See Comment 1b	See Comment 1.b. and revise Note #3 to clarify the current strategy.	See above.
2d.	General					Parcel B IPR Site 5	Amend Note #2 to incorporate and explain the impact of the "Not Fully Evaluated" area, adjacent "Parcel B", and "IPR Site 5" on the "Qualitative Cumulative Risk Evaluation" for land transfer.	See above.
3.	General	2.4 A1.1 A1.2 A1.3 A1.4 A1.5				IP #1 ROD Figure 2-5	Risk Assessment--General Information Risk assessment information was moved to Appendix A of the IP #1 ROD. For future ROD documents, we recommend that a brief description of the risk assessment approach be provided in Section 2.4. The description would accompany the conceptual site model in Figure 2-5 and should refer to site-specific risk assessments presented in Appendix A or in the preceding Feasibility Study if complete risk assessments were presented in that document. The description might include the text of the introductory paragraph in the current Appendix A risk assessments and should include reference to USEPA Risk Assessment Guidance on which the baseline risk assessments were based. Brief summaries of the general information in the current Appendix A Sections A1.1, A1.2--including all exposure scenarios and corresponding soil depth intervals, A1.3, A1.4, and A1.5 also should be provided in Section 2.4.	As recommended, in future ROD documents a brief description of the risk assessment approach will be added. Please see the response to EPA General Comment 1 for related text additions.
4.	General					Figure 2-5	Figure 2-5 showed combined inhalation exposure pathways for VOCs and fugitive dusts for indoor and outdoor scenarios. This generalization did not reveal the specific pathways evaluated in most of the site-specific risk assessments. We recommend showing separately the indoor air pathway--VOC emission from soil directly into indoor air. This is the only exposure pathway evaluated for the indoor worker and is included for the residential scenario. The Figure is acceptable as shown for the IP ROD #1, but should be revised for future ROD documents	The figure was revised to show the exposure pathway involving volatilization of VOCs from soil to indoor air separate from the exposure pathway involving inhalation of fugitive dusts.
5.	General					SA 3	The Response to Comments and corresponding revisions to the text for SA 3 adequately addressed HERD comments. For the other six sites, the Response to Comments and revisions were generally acceptable except as noted below. The following site-specific comments and recommendations address the revisions and remaining issues for consideration by the remedial project manager.	See the responses to General Comments 5a through 5e below.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
5a.	General	2.4.1.4	2-23			PRL S-14 Figure 2-6	<p>Responses to HERD comments were acceptable. The following comments and recommendations address revised and amended text and tables.</p> <p>Because the text of the first paragraph for "PCBs" discussed sample location PLS14SS001, this sample location should be included on the site map in Figure 2-6. Also, the text should identify sample PLS14SS002 as the location of the only sample from the south side of Building 22 in which PCBs were detected.</p>	<p>Sample location PLS14SS001, along with other sample locations, has been added to the figure. Reference to sample location PLS14SS002 was added to the 2nd to last sentence in the first paragraph for PCBs.</p>
5b.	General	2.9.2 2.4.1.4	2-77 2-23 2-24			PRL S-14 Figure 2-6	<p>The lack of soil samples in the former hazardous waste storage area south of Building 22 was described as one of the uncertainties in site risk characterization. According to Section 2.4.1.4, soil samples will be collected beneath the storage area as part of the remedial design. For consistency with Section 2.4.1.4, pp. 2-23 and 2-24, amend the text on p. 2-77 to include analysis for PAHs and metals, as well as PCBs.</p>	<p>In Section 2.9.2, second bullet, last sentence, additional text was added to include that PAHs and metals will also be analyzed within the former hazardous waste storage area during the remedial design.</p>
5c.	General						<p>Revise the units for ground water "Detected" and "Exposure Point" concentrations; the units should be ug/L, not mg/L.</p>	<p>In Table A1-1c, the units for "Concentration Detected" and "Exposure Point Concentration" have been changed from mg/L to ug/L.</p>
5d.	General	A1.4	A1-4 A1-5			Table A1-5	<p>For the reported risks and hazard for each residential receptor, clarify and distinguish risk/hazard associated with soil/soil gas, soil/soil gas minus the produce pathway, and total--soil/soil gas and ground water. When comparing these results, use a consistent number of significant figures. For example, the first two bullets reporting hazard indices for the child resident were for all soil pathways (soil and soil gas), but that was not indicated. Furthermore, the results were reported as 1.4 for the 0 to 2 ft bgs interval and as 1.8 for the 0 to 10 ft bgs interval. However, the results for total hazard--soil and ground water, were reported as 1 and 2, inaccurately indicating the total hazard decreased by including ground water. According to Table A1-5, the total hazard estimates were 1.5 and 1.9. We suggest using two significant figures to demonstrate the comparison. Alternatively, use one significant figure and report ground water risk or hazard separately (HQ = 0.1 in this example), in addition to total risk.</p>	<p>The risk for soil/soil gas, soil/soil gas minus produce, and soil/soil gas plus groundwater were added to the text in Section A1-4 (pgs. A1-4 to A1-5). As suggested, risk from groundwater only was included also. A consistent number of significant figures was used to compare risk results.</p>

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
5e.	General	A1.5	A1-6			Second Bullet	The second bullet regarding the uncertainty associated with chronic toxicity of arsenic should be revised to clarify that USEPA does not have a route-specific reference dose for inhalation exposure to arsenic. The text should be corrected to state that the "hazard associated with inhalation exposure for arsenic was calculated using the USEPA oral RfD of 3×10^{-4} mg/kg-day and route extrapolation." The second sentence should be revised to reflect that the "now available" California EPA reference exposure level (REL) for arsenic is preferable because it is route-specific (i.e., not because the REL-based inhalation RfD is more conservative than the USEPA oral RfD).	The text for the uncertainty section of PRL S-014 will be revised as suggested.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
6.	General	2.4.2.4				PRL S-33 Table A2-1	<p>The risk assessment presented in the IP ROD #1 was limited to PAHs in soil. According to the Response to Comments (previous HERD Comment 31 [first "31"]) only the confirmation sample data from the excavation footprint were used. The Response also clarified that the majority of the confirmation samples were collected from 0 to 2 ft bgs but some were from intervals as deep as 5 ft bgs; therefore, the interval 0 to 5 ft bgs was used for the assessment. No data for the imported soil used for fill or data for areas outside the excavation footprint, including those for PAHs, metals, and VOCs, were included in the assessment. The total number of samples was revised from 70 to 39 (text in Sections 2.4.2.4 and Appendix A2, and Table A2-1) to exclude interim samples collected during the excavation.</p> <p>The Response clarified that samples with concentrations below detection limits were included, using one-half the detection limit concentration, in estimating the exposure concentration. The Response also stated that the 95 percent upper confidence limit of the mean (95% UCL) was based on a normal distribution. However, the Response did not explain whether that was the actual distribution based on statistically testing the data for each of the detected PAHs or if the distribution was assumed. As a result of the revision in the sample data set, the minimum and maximum measured concentrations reported in Table A2-1 were revised. For five of the seven PAHs detected, the minimum measured concentrations decreased. The maximum concentrations for all of the PAHs were decreased significantly (5- to 10-fold). However, the 95% UCL for each chemical of potential concern (COPC), selected as the exposure concentration, was not revised. Furthermore, for every COPC the exposure concentration was lower than the minimum measured concentration. The Response stated that the removal action closure report did not identify the individual samples used in the calculations; therefore, the data distribution and calculations could not be verified.</p> <p>Difficulties in interpreting risk assessment information from previously reported site risk assessments were demonstrated in the information reported for PRL S-33. We question the summary statistics presented in Table A2-1, particularly exposure concentrations. However, because risks associated with the reported maximum concentrations would still be less than 5E-06, the risk characterization for the site is adequate for final remedy selection at this site. The problems such as those described here should be resolved for other sites before final risk assessments are presented in future ROD documents.</p>	Please see the responses to Comments 6a through 6e below.

Response to Comments: Draft Final IP ROD #1 (7 Sites)

Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
6a.	General	2.4.2.4	2-29				Briefly describe PAH soil concentrations for areas outside the excavation footprint. Clarify whether any of the concentrations exceeded the exposure concentrations for confirmation samples within the excavation footprint, and describe how the exposure concentration would be affected if the area outside the excavation were included in the exposure area (see previous HERD Comment 31.a).	The following text was added as the last paragraph of the PAH subsection of Section 2.4.2.4. PAHs were also detected in two sediment samples collected outside the excavation area and northwest of PRL S-033. The sediments contained concentrations of benzo(a)pyrene (0.0049 mg/kg and 0.0029 mg/kg) that were less than the residential PRG (0.062 mg/kg) (OU B RICS Addendum). Each reported concentration exceeded the exposure point concentration (0.0023 mg/kg), but was within the range of detected concentrations; thus, no significant impacts to exposure point concentration are expected if these data were included in the exposure area.
6b.	General	2.4.2.7	2-33				Basis for No Action. Clarify whether VOCs detected in soil gas samples around the perimeter of the building will be evaluated in the VOC feasibility study or other document.	The last sentence of the section has been rewritten as follows to clarify the intent: "Therefore, no further action is warranted at this site under CERCLA to address non-VOC contaminants. VOCs detected in shallow soil gas will be evaluated in a future FS and ROD."
6c.	General	A2.2	A2-1				Revise the exposure scenarios and soil depth interval to reflect that only one scenario and the 0 to 5 ft bgs interval were evaluated, rather than two scenarios based on 0 to 2 ft bgs and 0 to 10 ft bgs intervals. We also recommend that the text of the Response to HERD Comment 31.c. be included to support the deviation from the depth intervals used in risk assessments for other McClellan sites.	The exposure scenarios and soil depth intervals were revised to be consistent with the scenario and soil depth evaluated in the Removal Action report. Although confirmation samples were collected between 0-5 ft bgs, the majority of the samples were collected from the 0-2 ft bgs depth interval. The text from the Removal Action report indicated that validated confirmation sample results were used, but there was limited information available in the report to confirm what samples were used in the risk calculation. Therefore, there was a deviation from the depth intervals used in risk assessments for other McClellan sites. Text has been added to Section A2.2 to explain this.
6d.	General					Table A2-1	Explain why exposure concentrations reported in Table A2-1 did not change when the data set was revised from the Draft IP ROD. Revised exposure concentrations and risk/hazard calculations as appropriate. Clarify whether the data distributions were tested or whether normal distribution was assumed.	The exposure concentrations did not change when the data set was revised from the Draft IP ROD because those concentrations were reported directly from the PRL S-033 Removal Action report. The draft IP ROD summarized incorrect data set information, not incorrect exposure concentrations. Therefore, no revisions to the exposure concentration or risk/hazard calculation were required. Also, based on the report, the data distribution was a normal distribution.

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Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
6e.	General	A2.5	A2-2 A2-3				Clarify that the HQ of 2 for arsenic was based on the maximum measured concentration of 18 mg/kg by Method SW6010. The HQ for concentrations of arsenic reported in the two samples analyzed by Method SW7060 would be less than 0.7.	An HQ of 2 for arsenic was based on the maximum measured concentration of 18 mg/kg by Method SW6010. Text was included to reference the basis of the arsenic HQ.
7.	General					PRL S-40	Discussion: The Response to Comments and corresponding revisions to text and tables for PRL S-40 adequately addressed HERD comments. The DTSC project manager should note that the hazard index exceeds one (1) when the indoor air exposure pathway is included for naphthalene and 2-methylnaphthalene in soil. Also, soil samples were analyzed for TPH diesel and TPH gasoline but not benzene, toluene, ethylbenzene, and xylenes (BTEX). Shallow soil gas was sampled at four locations in the two-acre exposure area. Total soil concentrations of these VOCs might have been underestimated from soil gas concentrations.	Please see the response to Comment 7 below.
7.	General	B1.5.2	B-3			PRL S-40 Figure B1-1 Figure B1-2	Revise the text or Figure numbers for consistency (i.e., B-1 and B-2 or B1-1 and B1-2).	As suggested, the text referring to the figures has been revised to match the figures themselves. The sentence now reads: "Figure B1-1 identifies the site location and significant site features. Figure B1-2 provides the data from the remedial investigation sampling."
8.	General					SA 35 Table A3-1B Table A3-4 Table A3-5 Table A3-1D	<p>Subsequent to the Draft version of the IP ROD #1, approximately 1.2 cubic yards of soil were removed near the northwest corner of Building 20, the location of elevated arsenic concentrations and a single detection of bis(2-chloroethyl)ether. Therefore, reduction of risks associated with these two chemicals significantly reduced site soil risk. Although no revisions were made in inhalation and dermal hazard quotients for bis(2-ethylhexyl)phthalate and benzoic acid, the hazard index is not affected (see previous HERD Comment 62). Considering the removal action and subsequent changes in site characterization and site risk, the Response to Comments and corresponding revisions to text and tables for SA 35 adequately addressed HERD comments.</p> <p>Recommendation: Revise soil exposure concentrations of bis(2-chloroethyl)ether in Tables A3-1b, A3-4 and A3-5 to be consistent with the recalculated concentrations reported in Table A3-1d (all scenarios as appropriate). According to Table A3-1d, the concentrations for the 0 to 2, 0 to 10, and 0 to 15 ft bgs intervals were 0.46 mg/kg, 0.13 mg/kg, and 0.13 mg/kg, respectively. The 0 to 15 ft bgs interval should be used to estimate indoor air concentrations.</p>	<p>This comment was further discussed with HERD. For Table A3-1b, it was agreed to leave the exposure point concentration for bis 2cee in soil at 0.2 mg/kg and leave all the flux rates and air concentrations as they were in the Draft Final ROD table. A reference was added to Table A3-1b stating that the values cited in the table are from the OU A RICS Addendum. A footnote was added to Table A3-1b that states how bis 2cee was evaluated as a VOC for OUA RICS Addendum and as a non-VOC for the FS and ROD; the footnote states that risks would not be significantly different if bis2cee was evaluated as a VOC. In addition, text was added to the uncertainties for SA 035 that discuss the uncertainties associated with evaluating bis2cee as a non-VOC. For Tables A3-4 and A3-5, soil exposure point concentrations were made consistent with Table A3-1d except for the occupational indoor air scenario - for that scenario the exposure point concentration matches Table A3-1b (0.2 mg/kg). Footnotes were added to Tables A3-4 and A3-5 that state how bis2cee was treated as a VOC in the OU A RICS Addendum (for the occupational indoor air scenario) and as a non-VOC for the FS/ROD (all other scenarios).</p>

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Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
9.	General					SA 41	The Response to HERD Comments and corresponding revisions were generally acceptable. We provide two specific recommendations for further clarification, and reiterate our comment and recommendation regarding VOCs in shallow soil. The maximum measured concentration of carbon tetrachloride at 3 ft bgs in screening samples exceeded the 1999 VOC FS risk-based screening concentration by seven-fold (information provided in the Environmental Site Folder--Section 1, 1992 Jacobs Engineering figure for carbon tetrachloride, and Section 3, Reference 8, risk-based soil gas concentrations derived from USEPA version of the Johnson and Ettinger soil vapor intrusion model, screening mode with DTSC toxicity criteria and default assumptions or McClellan-specific soil properties). Only one shallow soil gas sample with definitive analysis was collected at the site. As noted in our previous comments, using definitive VOC concentrations in that sample and cited screening concentrations, the cumulative indoor air risk is not expected to exceed 10-4. However, using the USEPA "Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Ground Water and Soils" risk-based, generic shallow soil gas screening levels, the risk might approach or exceed 10-4. The VOC FS for the site should evaluate the VOC data and multi-chemical risk.	Please see the responses to Comments 9a and 9b below.
9a.	General	2.4.5.4 2.4.5.7	2-49 2-51				As noted in our previous comments, the Visual Site Inspection Form in Section 3 of the Environmental Site Folder described an area of soil exposed along the east side of the building. Revise or delete the text of these sections of the IP ROD which stated that no exposed soil is present.	As suggested, the text has been revised to clarify there is a 3' strip of exposed soil along the east side of Bldg 54. The text now reads, "Because the building has a concrete floor with no drains, visual evidence of contamination was not noted, and paving surrounds the building except for a 3 foot wide strip of exposed soil along the east side of the building, suspected sources or potential contaminant pathways were not identified and no soil samples were collected (SCS and FSP, Jacobs, 1995b). The text in section 2.4.5.7 has been revised to read, "There was also no exposed soil present around the building with the exception of a narrow 3-foot wide strip along the east side of the building."
9b.	General	2.4.5.7 2.4.5.4	2-51				The text should be further revised to clarify that the 1995 screening assessment cited did not include the indoor air pathway (see previous HERD comment 67.b.), and that the site will be evaluated in the VOC FS (Section 2.4.5.4).	The text was revised as suggested to indicate that the screening assessment did not include the indoor air pathway. The last sentence of the section has been rewritten as follows: "Therefore, no action is necessary at this site to address non-VOC contaminants. VOC contaminants will be addressed in subsequent RODs."

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Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
10.	General					SA 91	The Response to HERD Comments and corresponding revisions to text and tables for SA 91 were generally acceptable. A screening evaluation of ground water risk, based on one ground water sample, was added to the risk assessment in Appendix A.	Please see the responses to Comments 10a through 10d below.
10a.	General	2.4.6.7	2-56			Third Bullet	The open storage and truck parking areas, contaminated by low levels of TPH-diesel, were not sampled for metals or PAHs (we could not locate the data for one sample reportedly analyzed for these potential contaminants; see previous HERD Discussion and Comment 69). Revise the bullet to accurately reflect the number of samples collected in the 4.5-acre area east of the building that were analyzed for SVOCs (PAHs) and for metals.	As discussed in Section 2.4.6.3, soil samples were collected after a spill and were analyzed for SVOCs and metals. The following sentences were added to the bullet: "These samples were collected outside of the exposure area as discussed in Section 2.4.6.3. None of the samples collected from the open storage and truck parking area were analyzed for PAHs or metals."
10b.	General	2.4.6.4	2-54				Although PCBs were not detected in soil samples from the transformer storage area, detection limits for about 10 percent of the samples reportedly were between the screening level of 0.063 mg/kg and 3 mg/kg. Possible reasons for elevated detection limits for PCBs were not provided. We suggest that the text note whether the samples with elevated detection limits were collected in the same boring or in the same subarea, or if the samples were contaminated with TPH-diesel.	The following text has been added to the paragraph under the Polychlorinated Biphenyls subsection: The elevated method detection limits were reported in seven samples, of which only one had a detection of TPH-D and two others had detections of pesticides. Six of the seven samples were from three adjacent borings. The reason for the elevated method detection limits is not known, nor is the relative location of these samples to the reported transformer storage. Samples were collected at 32 locations (28 locations during the RI and 4 locations during the 2002 data gaps investigation) in the open storage area on 50 foot centers. The four locations with elevated method detection limits represent approximately 13% of the open storage area.
10c.	General					Table A4-1	The Response to HERD Comments 73 and 76 clarified that the exposure concentrations for DDE and DDT were based on an assumed normal distribution of concentrations (the data reportedly were neither normal nor lognormally distributed). This is a departure from the approved procedures for McClellan risk assessments. However, we estimated that if the maximum concentrations for these two contaminants were used for the exposure concentrations, the soil risks would not exceed 2E-6. Therefore, revision is not required. The Response also noted that the exposure concentration for DDE in the 0 to 10 ft bgs interval was incorrect but the risk and hazard were correctly calculated in the Draft.	No changes were made to the risk assessment calculations. The protocol that has been used at McClellan for exposure point concentrations was as follows: when the data set did not follow a normal or lognormal distribution, the lognormal EPC was used as a default. For future risk assessments, we will show summary statistics for data sets and use the appropriate EPC (e.g., normal, lognormal, nonparametric) based on the characteristics of the data set.

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Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
10d.	General					Table A4-5 Table A4-6	In a "spot check" of the calculations for ground water, we could not verify the estimates for dermal risk and hazard. We suggest the calculations be reviewed and revised as appropriate. Ground water risks were estimated to be 2E-04 and the hazard index exceeded one; a slight revision in dermal risk is not expected to significantly impact total ground water risk.	The risk calculations for groundwater for SA 091 for the dermal pathway were checked. Discrepancies between the spreadsheets used for the calculations and the assumptions that are specified in the OU A RICS HHRA were not found. In discussing this comment with HERD, it was determined that different Kp values were used for the "spot check" than in the calculations for the ROD. Therefore, there were small discrepancies in results. No changes are needed for the risk calculations as presented in the ROD because the latest version of the McClellan risk calculator spreadsheet was used.
11.	Minor	2.3.1	2-10	First		Figure 2-3	Revise the fourth sentence to be consistent with Figure 2-3 and to clarify that sites with non-VOCs and VOCs in shallow soil or soil gas (0 to 15 ft bgs) will be addressed in the appropriate ROD (i.e., Initial Parcel ROD #2 or #3), and sites with VOCs in deeper soils will be addressed in the VOC ROD.	As suggested, the sentence has been revised to read, "If non-VOCs and VOCs in shallow soil or soil gas (0-15' bgs) are present at the site and require remedial action, then the action will be documented in the appropriate ROD (i.e. Initial Parcel ROD #2 or #3), and sites with VOCs in deeper soils will be addressed in the VOC ROD."
12.	Minor	2.3.1	2-10			Figure 2-3 First and Third Bullets	Amend the text to define "surface soil" (0 to 1 ft bgs or 0 to 15 ft bgs?). If the text was referring to the 0 to 15 ft bgs soil interval, then we suggest using "shallow soil", including a definition of the depth interval.	Please see the response to General Comment 1.
13.	Minor	2.3.1	2-10			Figure 2-3	Define "RD".	The figure has been deleted. Please see the response to General Comment 1.
14.	Conclusions						The Response to HERD Comments and corresponding revisions in the IP ROD #1 were generally acceptable. For several of the revisions and amendments, minor corrections are needed and additional clarification is recommended. Risk estimates for soil contamination are not expected to be significantly impacted. Site risk assessments were acceptable; however, we recommend that future risk assessments provide additional information regarding site-specific exposure areas. According to the IP ROD #1, risks associated with low concentrations of VOCs in shallow soil gas at several of the sites will be evaluated in a pending FS or ROD. Methods for evaluating VOC risk must include the indoor air exposure pathway.	Please see previous responses.

**Response to Comments on the
Draft Document**

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	General						<p>A substantial number of factual, editorial and apparently unintended grammatical errors were noted in the review of the Draft Initial Parcel (IP) Record of Decision (ROD) #1 . While such errors are noted below in the specific comments and in the Errata, they should not be considered minor comments. Since a ROD is an enforceable document and is reviewed by EPA head quarters, errors such as misidentification of site names and erroneous chemical properties are far more serious than in most other documents. Please conduct a thorough check of facts and technical editing before issuing the Draft Final ROD and include the Errata in the response to comments.</p>	<p>In producing the Draft Final ROD document the noted errors have been corrected. As suggested, a thorough check of facts and technical editing has been accomplished and the Errata section has been included in the response to comments.</p>
2.	General						<p>There appears to be an inconsistent approach applied in the ROD to metals concentrations when comparing site results to background. In various instances, reported metals concentrations are compared to the combined background value, the apparent range of background values, or the maximum concentration of the background data set (presumably for specific metals and not the maximum reported value for all metals listed in the background data set). As agreed by the Base Realignment and Closure (BRAC) Cleanup Team (BCT), metals concentrations are considered to be above background when the maximum detected concentration exceeds the combined background value established for soils. This is the only value to which detected metals concentrations should be compared in this ROD, and all other references should be deleted.</p>	<p>For consistency purposes, where appropriate (and in most instances), the draft final document has been revised so that references to background are now references to "combined" background concentrations for metals. However, the statistical analysis of metal concentrations as compared to the background data set and the background concentrations from specific lithologies are in some cases relevant for determining if a reported metal concentration represents contamination and determining the cleanup levels.</p> <p>As agreed to with the regulatory agencies during the IP FS #1 (US EPA- TechLaw General Comment 1 on the Draft Final Initial Parcel FS #1) for identification of COCs in subsurface soil, the "combined" background values were used. Additional discussion of the metals concentrations is provided when the metal was found to exceed the normal variance of background based on a statistical analysis and the concentration exceeds the combined background value. When the risk-based screening level was less than the background concentrations for silt/clay, the silt/clay value was used as the cleanup level.</p>

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Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
3.	General						<p>At a number of points in the ROD exposure to trichloroethene (TCE) is evaluated. However, since this ROD does not address VOCs, the TCE analysis should be eliminated in light of the current controversy regarding the evaluation of TCE risk.</p>	<p>At the request of the Human and Ecological Risk Division (HERD) of the Department of Toxic Substances Control (DTSC), cumulative risks (including VOCs) were included in the human health risk assessment summaries for the Initial Parcel (IP) sites. The toxicity values for TCE used in the risk assessments that are presented in the Draft IP ROD #1 were as follows:</p> <p>Slope Factor (SF) oral = 0.015 (mg/kg-day)-1 SFInhal = 0.01 (mg/kg-day)-1 Reference Dose (RfD) oral = 0.006 mg/kg-day RfDinhal = 0.006 mg/kg-day</p> <p>The reference given for each of these toxicity values in the original HHRA documents was USEPA National Center for Environmental Assessment (NCEA). In a memorandum from Patty W. Wong-Yim/DTSC to Stan Phillippe/DTSC dated February 19, 2003, HERD recommended using the California EPA Office of Environmental Health Hazard Assessment (OEHHA) toxicity values for TCE for risk assessments. The OEHHA toxicity values are as follows (cancer slope factors are from OEHHA's September 2003 list and reference exposure level is from OEHHA's August 2003 list):</p> <p>SForal = 0.013 (mg/kg-day)-1 SFInhal = 0.007 (mg/kg-day)-1 Reference Dose (RfD) oral = not available from OEHHA RfDinhal = 0.17 mg/kg-day (based on a chronic reference exposure level [REL] of 600 ug/m3)</p> <p>The toxicity values used in the risk assessments that are summarized in the Draft IP ROD #1 are more conservative than the OEHHA toxicity values that are currently recommended by HERD. Therefore, based on this comment and General Comment 3 from HERD on the Draft IP ROD #1, text was added to the uncertainty sections of the risk assessment summaries that states that VOC risk estimates might increase or decrease by more than an order of magnitude when the VOC risk assessments are updated using the most current toxicity criteria. .</p>

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Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
4.	General						In sections of the decision summary which present the results of the human health risk assessments for each of the IP sites (e.g., first paragraph on page 37), the dash separator between the text and the risk estimates should be changed to avoid the impression that these are negative numbers.	The human health risk assessment details, including the associated tables, have been moved to Appendix A. The text associated with the risk estimates for each site has been modified as requested to avoid giving the impression that the numbers are negative. The dash separator between the text and the risk estimates has been eliminated and the text reworded to present the results more clearly.
5.	General						When reporting non-carcinogenic risks using scientific notation, there is some risk that the public will confuse a non-carcinogenic hazard quotient of 5.E-04 as a carcinogenic risk above the risk management range requiring an action. Please consider revising the non-carcinogenic risk characterization summary tables to reduce potential confusion by the public regarding the nature of the risk (e.g., report non-carcinogenic hazards as 0.00001 rather than 1.E-05).	To maintain the readability of risk tables in the appendices, the non-carcinogenic hazard quotient has been reported using scientific notation. However, in the text, the non-carcinogenic hazard quotient results have been reported using decimal format to minimize the risk of confusion.
1.	Specific	1.1	1			Statement of Basis and Purpose	The Declaration section states that the ROD addresses only non-VOCs in soil, but it should clearly discuss that the remedies in this ROD do not address VOC contamination that may be present at these sites. For those sites requiring remediation of VOCs, the remedies are incomplete and institutional controls will be required. Please revise the text to clarify that VOC contamination is not addressed and identify those sites where additional response action will be required, including groundwater.	As suggested, the following text has been added to clarify that VOCs which may be present at these sites will be addressed in future RODs: "The remedies in this ROD do not address VOC contamination that may be present at these sites. All seven sites will be evaluated in future RODs for soil and groundwater to determine if response actions are required for VOC contamination."
2.	Specific	1.3	3			Description of the Selected Remedy	This Section makes clear that potential release location (PRL) S-040 is solely contaminated with fuel-related compounds, but is not as clear in explaining the generic CERCLA petroleum exclusion. Please revise the sentence, Sites contaminated with fuel-related compounds are excluded from CERCLA requirements to clarify that the exclusion refers to sites contaminated only with petroleum and not commingled with CERCLA hazardous substances by adding the word solely before with fuel.	As suggested, the word "solely" has been added: "Sites contaminated solely with fuel-related compounds are excluded from CERCLA requirements."
3.	Specific	1.4	3			Statutory Determinations PRL S-014 and SA 003	The last sentence on this page refers to hypothetical future remedies and as such is not relevant to the selected remedies at these two sites. Please delete the sentence.	As suggested the sentence referring to future remedies has been deleted.

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Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
4.	Specific	2.3.3	18			Activities Proposed in this ROD	This Section inappropriately presents selected remedies for the IP sites prior to a discussion of the alternatives evaluated, and should be moved such that it follows the presentation of the analysis of alternatives. Otherwise, statements such as the proposed remedial action at PRL S-033 is Alternative 3A are without context.	Agreed. The text in Section 2.3.3 has been replaced with the following: This ROD addresses only non-VOCs in soil at selected sites within the Initial Parcel. Cleanup levels to support unrestricted use require remediation of non-VOC contamination in soil until residual risk from each contaminant is at or below the lesser of a carcinogenic risk of 1×10^{-6} or a non-carcinogenic hazard quotient of 1. If VOC contaminants are not present in soil or groundwater, the result will be property available for unrestricted use. If VOC contamination is present in groundwater or soil at the sites, additional actions may be required before unrestricted land use will be allowed as discussed in the following section.
4A.	Specific	2.3.3	18			Activities Proposed in this ROD	In addition, the text here states that if VOCs are not present, the proposed remedial actions will result in property available for unrestricted reuse, thereby minimizing reliance on institutional controls in perpetuity. This statement is confusing, as even minimal reliance on institutional controls is contradictory to the concept of unrestricted land use. Please clarify this statement to make it clear that the term unrestricted use refers to the surface and that there may be subsurface use restrictions related to groundwater.	Agreed. The text has been revised to clarify that remediation of non-VOCs in soil may be only one of several actions required to allow unrestricted use. Please see the response to Specific Comment 4.
5.	Specific	2.3.4	18-19			Future Response Plans	This Section discusses future non-VOC sites, but does not discuss future response actions for the sites included in this ROD. At a minimum, the ROD should acknowledge that other response actions are anticipated.	The following text was inserted as the second paragraph of Section 2.3.4: Remedial actions may also be required to address VOC contamination present in soil and groundwater. VOC contamination in groundwater and in soil that presents a threat to groundwater will be addressed in the pending Basewide VOC ROD. With the exception of the sites included in this ROD, VOC contamination in shallow soil at depths less than 15 feet that presents a threat to human health or groundwater will be addressed in the same ROD as the non-VOC contamination for that site. For the sites included in this ROD, the VOC contamination in shallow soil will be addressed in a future (but undermined) ROD. The following text was inserted as third sentence of the first paragraph of Section 2.3.4: The Strategic Sites ROD will also address radiological contamination in soil.

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Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
6.	Specific	2.4	21			Figure 2-5 Exposure Pathway Analysis	This figure appears to have been created for inclusion in a feasibility study and should be updated for this ROD. For example, Note 2 indicates that confirmation or elimination of potentially complete exposure pathways will be based on site-specific information in the various Remedial Investigation Characterization Summaries. At this point, such information should have already been evaluated. Please update the figure to reflect this information presented in the ROD.	The figure has been updated as requested.
7.	Specific	2.4.1.4	24			PRL S-014, SVOCs and TPH	The last paragraph on page 24 indicates there were two underground storage tanks (USTs) at the site and one of them contained either diesel or waste solvent, but there is no further discussion of waste solvents. The soil samples collected from the area were apparently analyzed for petroleum products, but not chlorinated solvents. However, on the following page presents data indicating low concentrations of VOCs in shallow soil gas. Review of the RICs Addendum indicates that these shallow soil gas samples were collected near the tank excavation, suggesting there was not a significant solvent release from the area of the two USTs. Please present further evidence that a waste solvent tank did not exist at the site and use the VOC data collected near the two USTs to verify that a significant release did not occur in the area of PRL S-14.	The following text was inserted in Section 2.4.1.4, SVOCs and TPH, second paragraph, last sentence: As discussed in the following subsection, only low levels of VOCs were detected in shallow soil gas samples collected adjacent to the former USTs thereby providing further evidence that a significant release of waste solvents did not occur. The following text was inserted as the first paragraph of Section 2.4.1.4 VOCs (replacing the previous text): VOCs analyzed by TO-14 were reported in five samples collected from three borings. The highest reported VOC concentration was carbon tetrachloride at 180 J parts per billion by volume (ppbv) at 8 ft bgs. Additionally, during the Data Gap 3 investigation, carbon tetrachloride was detected at 300 J ppbv at 7 ft bgs and Freon 11 was detected at 490 J ppbv at 6.8 ft bgs. Four of the shallow soil gas samples were collected within approximately 20 feet of the former USTs with three of the four samples having detections of carbon tetrachloride. VOC contamination in soil gas at the site will be addressed in a subsequent ROD.
8.	Specific	2.4.1.7	31			PRL S-014, Human Health Risk Assessment	For clarity, text in this Section should be revised to state that exposure to polychlorinated biphenyls (PCBs) is associated with a number of toxic effects, including cancer, and that for purposes of evaluating non-carcinogenic effects, the reference dose (RfD) is based on effects on the immune system.	Text was added to Appendix A, Section 1.3 about the toxic effects of PCBs as indicated in the comment.
9.	Specific	2.4.1.7	31			PRL S-014, Human Health Risk Assessment	Please correct the page setting at the end of this page, as the last line contains only two words.	The draft final document has been corrected so that any sentence breaks are done appropriately.
10.	Specific	2.4.1.7	31-34			PRL S-014, Human Health Risk Assessment	The statement that an individual's risk of developing cancer is one in three is unattributed and not relevant to the selection of a remedy for this site and should be deleted.	The sentence has been deleted from each of the individual Risk Characterization sections in which it appeared in the document.
11.	Specific	2.4.1.7	32			Table 2-3 Cancer Toxicity Data Summary	Please include an explanation of the alphanumeric weight of evidence classifications shown in this table.	Footnotes were added to the table to explain the weight of evidence classifications.

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Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
12.	Specific	2.4.1.7	32			Table 2-4 Non-Cancer Toxicity Data Summary	The RfD for xylene shown in this and all subsequent tables is incorrect. The correct value is 0.2 mg/kg-day, not 2 mg/kg-day as shown, and is based on decreased overall body weight and increased mortality in rats. Please revise the RfD for xylene.	In some cases, the toxicity criteria that were used for the risk assessments have subsequently changed. Rather than revise the risk assessments for VOCs at this time, this issue will be addressed as an uncertainty. Please also see the response to HERD General Comment 3.
13.	Specific	2.4.1.7	34			PRL S-014, Human Health Risk Assessment	The discussions on this page regarding cumulative risk and EPA's risk management range require further clarification. The decision summary should clearly indicate which risks will be reduced (and which will not) by the proposed remedial action. Further, EPA's risk management range generally includes risks less than 1×10^{-4} . Hence, at a minimum, the statement that cumulative risks associated with exposure to contaminants at PRL S-014 are within EPA's risk management range is incorrect and should be revised.	The sentence of the sixth paragraph in the Risk Characterization subsection has been changed as follows: "The risk estimate for the future adult resident for soil (0-10 feet bgs depth interval) and groundwater is at the upper end of the US EPA risk management range. All other estimated risks are within or below the range." The requested information regarding the risks addressed by the selected remedial action is provided in Section 2.9.4 (Expected Outcomes of Selected Remedy).
14.	Specific	2.4.1.7	37			PRL S-014, Human Health Risk Assessment, Uncertainties	The discussion of the uncertainties notes that current exposures are limited because of the presence of surface covering at PRL S-014. However, maintenance of these covering represents an institutional control that is not a component of the selected remedy for this site, and thus is not relevant to the discussion. The reference to exposure being limited by surface coverings should be deleted from the ROD.	As suggested, the text discussion on surface coverings has been deleted.
15.	Specific	2.4.1.7	37			PRL S-014, Human Health Risk Assessment, Uncertainties	Please correct the typo at the end of this page, as one line breaks in the middle of a word, the following line breaks in the middle of the sentence, and the line picks up on page 45 in the middle of the sentence, but formatted as a new bullet.	As suggested, the sentence structure for this sentence, and all sentences throughout the document have been edited to ensure all sentence breaks are appropriate.
16.	Specific	2.4.1.7	37			PRL S-014, Human Health Risk Assessment, Uncertainties	As discussed in EPA's ROD Guidance, the discussion of uncertainties should indicate whether the uncertainties are expected to underestimate or overestimate the potential risk. Please revise the discussion of uncertainties to include this information.	The uncertainty section for PRL S-014 in Appendix A was revised to indicate whether the uncertainties are expected to overestimate or underestimate risks.

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No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
17.	Specific	2.4.2.4	48			PRL S-033	The first bullet states that arsenic results using Method SW6010 are considered unreliable, but some explanation should be provided. For example, it is not clearly explained why only unreliable SW6010 results for arsenic are available for this site but this fact does not constitute a data gap. This data gap would need to be filled prior to selecting a remedy. Further, all references to Method SW6010 results for arsenic as unreliable should be prefaced with the explanation from the General Framework document that certain analyses performed for McClellan were subject to matrix interference that biased the results. Method SW6010 results for arsenic have proven to be accurate at other NPL sites and more recent McClellan results are reliable.	Please see the response to Errata Comment #4.
18.	Specific	2.4.2.4	48			PRL S-033	Chromium, cobalt, and nickel were reported to be above their established combined background value, yet the concentrations are attributed to being below all screening levels. Please explain why the combined background concentration for these metals does not constitute a screening level. Further, it is not clear whether these concentrations were excavated during the polynuclear aromatic hydrocarbon (PAH) removal action, or whether subsequent sampling simply did not detect any metals above background. Please clarify. This comment also applies to all other instances in the ROD where metals concentrations are noted as exceeding established background values but less than all screening levels.	<p>The text is intended to indicate where threats to human health, surface water, and groundwater potentially exist. Metals concentrations that are above background but less than the screening levels do not pose a significant threat to human health or the environment. The following changes have been made to improve the clarity of the text.</p> <p>Inserted and/or deleted the following text in Section 2.4.2.4, Metals, bullets 2, 3, and 4: Bullet 2 and 3: Change "below all screening levels" to "below all screening levels for the protection of surface water, groundwater, and human health" at the end of the last sentence.</p> <p>Bullet 4: Insert "risk-based" in the 3rd sentence before the word "screening".</p> <p>The following text was inserted after the last sentence of the paragraph preceding the bullets: The maximum concentrations of these metals were detected in soil borings located outside the excavation area for the PAH removal action.</p>
19.	Specific	2.4.2.7	51			PRL S-033	The first sentence of the risk characterization section on this page notes that the results are based U.S. EPA toxicity values. However, previous text in the toxicity assessment section on this page states that the slope factors for PAHs were obtained from the California EPA. A review of Table 2-8 indicates that an oral slope factor of 12 per mg/kg-day was used for benzo(a)pyrene in the risk assessment. The oral slope factor listed in EPA's Integrated Risk Information System (IRIS) for benzo(a)pyrene is 7.3 per mg/kg-day. Please correct this discrepancy.	The text in Appendix A was revised to state that California EPA and USEPA toxicity values were used in the risk assessment.

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No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
20.	Specific	2.4.2.7	52			Table 2-8	Cancer Toxicity Data Summary, PRL S-033: As noted in our comment for PRL S-014, please include an explanation of the alphanumeric weight of evidence classifications shown in this table.	Footnotes were added to the table to explain the weight of evidence classifications.
21.	Specific	2.2.2.7	53			HHRA Uncertainties	As previously noted for PRL S-014, the discussion of uncertainties should indicate whether the uncertainties are expected to underestimate or overestimate the potential risk. Please revise the discussion of uncertainties to include this information.	The bullets have been revised as requested.
22.	Specific	2.4.2.7	54			Table 2-11	Risk Characterization - Non-Carcinogens PRL S-033: The hazard quotients presented in this table for both the future resident adult and the future resident child differ from the hazard quotients presented in the Final Remedial Action Report (RAR) for PRL S-033 (Weston/Kleinfelder, 2002). Please clarify why different hazard quotients are presented in the RAR and the ROD. Note that the carcinogenic risks are the same in the two documents.	Based on a comment from DTSC on Appendix H of the Draft Initial Parcel Feasibility Study (memorandum from Barbara Renzi/DTSC to Kevin Depies dated March 14, 2003), the Hazard Quotients (HQs) for PRL S-33 were corrected. The HQs were incorrectly calculated in the RAR (cancer potency equivalency factors were incorrectly used in the calculation of noncancer HQs). The HQs presented in the ROD are correct. Text has been added in Appendix A to explain the changes to the calculations.
23.	Specific	2.4.3.4	58				PRL S-040, Page 58: NNSPH should be N-nitrosodiphenylamine, not n-nitrosodiphenylamine as listed. Also, it is not clear whether the listed values are the reported concentrations in soil or the appropriate screening levels. Please clarify the text by denoting the maximum reported concentration in soil along with the associated screening value.	As suggested, the spelling of NNSPH has been corrected to read: "N-nitrosodiphenylamine" As clarification, the sentence describing the eight SVOCs is revised as follows: "Eight other SVOCs were detected at the maximum concentration indicated below, but at concentrations less than the chemical specific screening levels for the protection of human health, surface water, and groundwater:" Note: these changes are now part of Appendix B.
24.	Specific	2.4.3.4	58-59				PRL S-040: The statement in the first complete paragraph on page 59 that maximum reported concentrations of arsenic, iron, and manganese exceeded screening levels for protection of human health appears to contradict the statement on page 58 that only concentrations of copper, lead, and vanadium exceeded screening levels. Please resolve this discrepancy.	The concentrations of copper, lead, and vanadium exceeded those that would be considered within the normal variance of background. However, the maximum concentrations did not exceed the screening levels for the protection of human health or the environment. The first sentence of the second paragraph was rewritten as follows: The maximum concentrations of copper, lead, vanadium, and zinc (all detected in PS40SB013 at 2 ft bgs) were less than all screening levels for the protection of human health, surface water, and groundwater.

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No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
25.	Specific	2.4.3.5	60				PRL S-040: Please clarify which contaminants of concern represent a potential threat to groundwater, as the previous Section states that predictive modeling concluded that VOCs in the vadose zone will not impact water above MCLs.	The text in Appendix B was revised to indicate that TPH-D and TPH-G are the COCs that present a threat to groundwater. In the second sentence of the second paragraph, "contaminants of concern represent" was changed to "TPH-D and TPH-G present".
26.	Specific	2.4.3.7	63			Table 2-14	Please correct the typographical errors in this table (noted in the list of chemicals of concern). Also, this table lacks the explanatory footnote that the exposure point concentration represents the lower of the maximum detected concentration or the 95 percent upper confidence limit on the mean. Please add the footnote.	Note: The information for PRL S-040 has been moved to Appendix B. The typographical errors have been corrected. The following footnote has been added to the table: "The exposure point concentration is the lower value of the maximum concentration or the 95th UCL concentration."
27.	Specific	2.4.3.7	65-66			Table 2-15	Cancer Toxicity Data Summary, PRL S-040: Please provide a reference for the weight of evidence classifications shown in this table. An explanation of the acronyms used in this table should be provided in a footnote. In addition, please replace the missing cell in the last row, and clarify whether the information shown on page 66 is a continuation of Table 2-15.	Footnotes were added to the table to explain the weight of evidence classifications and the acronyms. In addition, the formatting was corrected.
28.	Specific	2.4.3.7	67-68			Table 2-16	Non-Cancer Toxicity Data Summary: It is not clear why the primary target organ listed for zinc and benzene is shown as the hematopoietic system in this table, while blood is listed as the target organ in Table 2-4. Please use consistent terminology throughout the ROD. For the sake of clarity, we suggest that it would be more appropriate to list the primary target organ for benzene as the blood-forming organs or system. Also, it is not clear why the format of Table 2-16 on page 67 differs from the format of Table 2-16 on page 68 (the information on page 67 lacks the date the information was obtained).	The formatting of the risk assessment tables was made consistent for the sites in the IP ROD #1. The primary target organ for benzene was listed as the blood-forming organs or system.
29.	Specific	2.4.3.7	71			Table 2-17	Risk Characterization Summary-Carcinogens, PRL S-040: Please correct the typographical errors in this table (i.e., groundwater).	The errors have been corrected.

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30.	Specific	2.4.4.4	76,79				SA 003: This Section discusses three soil samples that were collected to better define the target volume at SA 003, but no reference for the field work is presented. It is not clear if the field work was conducted under an approved sampling and analysis plan, or if the data are of sufficient quality to make remedial decisions. Please provide a reference that documents the quality of the sample collection effort.	<p>These data were collected under a short time frame during the IP FS #1 to reduce uncertainty regarding the extent of the target volume. Therefore, the data were not collected under an approved sampling and analysis plan. However, analytical results are documented in the IP FS #1 (Appendix H, SA 005 Attachment 2).</p> <p>Confirmation samples will be collected during the remedial action under an approved sampling and analysis plan to verify that the full extent of contamination is remediated.</p> <p>The following text has been added to the last paragraph of Section 2.4.3.3: ...volume for remedial actions (IP FS #1, Appendix H, SA 003 Attachment 2). While these data were not collected under an approved sampling and analysis plan, confirmation samples will be collected during the remedial action under an approved sampling and analysis plan to verify that the full extent of contamination is remediated.</p>
31.	Specific	2.4.5.7	90-92			Table 2-21	Non-Cancer Toxicity Data Summary, SA 035: A number of errors noted in this table require revision. The primary target organ on which the RfD is based is readily available in all of the referenced sources and should be included in the table. It is not clear why the units column for the inhalation pathway criteria is labeled "Oral RfD Units", or why the column for the sources of RfD: Target Organ for inhalation criteria is substantially narrower than the identical column for the oral criteria, causing the table to spread across several pages without the column headings being repeated. Please revise and reformat the table.	The table has been reformatted and target organs added.
32.	Specific	2.4.5.7	93				PRL S-035 Human Health Risk Assessment: According the first complete paragraph, no RfD was available for bis(2-chloroethyl)ether, "so RfDs for a chemical with a similar structure were used as surrogate values." What chemical was used as a surrogate?	Text was added in Appendix B to state that bis(2-chloroisopropyl)ether was used as a surrogate for bis(2-chloroethyl)ether for the risk assessment calculations.
33.	Specific	2.4.5.7	103				PRL S-035 Human Health Risk Assessment: Please correct the spelling of bis(2-chloroethyl)ether in each instance it is used in the first bulleted paragraph on this page.	The spelling has been corrected from "bis(2-chloroethl)ether" to "bis(2-chloroethyl)ether" as requested.

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34.	Specific	2.4.5.7	103				Basis for No Action: This Section would benefit from additional rationale, as the decision to take no action. For example, the risk contribution of arsenic at background concentrations and the importance of the home-grown produce pathway could be discussed, as well as additional information as to why the apparently limited extent of contamination reduces the concern that a substantial risk to human health exists. Please revise this Section with additional rationale to explain the basis for no action at SA 035.	Text has been added to Section 2.4.4.7 and Section 2.4.4.4 describing the results of additional sampling and analysis performed by the Air Force during December 2003. The results of this effort support the selection of No Action.
35.	Specific	2.4.7.4	107	3rd			SA 091: For clarity, please revise the text of the third paragraph on this page to state that concentrations of DDT and DDE were reported in the sample from SA91HA001. In addition, the extent of organochlorine pesticide contamination was successfully bounded, not bound as stated.	The text has been revised as follows in Section 2.4.6.4: "DDT44 and DDE44 concentrations of 0.34 mg/kg and 0.47 mg/kg, respectively, were reported in the sample from SA91HA001 at a depth of 2.5 feet. In this boring, there were no detections at the surface and 5-ft bgs samples. This location, the northwestern-most sample location, was not bounded laterally, and thus a data gap existed." "Based on this sampling event, the previously elevated detections from the RI were successfully bounded."
36.	Specific	2.4.7.4	114				SA 091: As noted previously, the statement that an individual's risk of developing cancer is one in three is unattributed and not relevant to the selection of a remedy for this site and should be deleted.	The reference to an individual's risk of developing cancer is one in three has been deleted at this point and throughout the document.
37.	Specific	2.4.7.4	114				SA 091, Page 114: For clarity, the text in the first paragraph should be revised to state that the target organ for which the critical effect on which the RfD for DDT is based is the liver. As a pesticide, the primary toxic effects of DDT are believed to be on the nervous system.	Text in Appendix A was revised to state that the target organ for the RfD for DDT is the liver.
38.	Specific	2.5	118				Remedial Action Objectives: Recognizing that the BCT has previously agreed to generic remedial action objectives (RAOs), a clarification of the RAOs in the ROD may be helpful. The RAOs include, Prevent or reduce human exposure to soil contaminants and Prevent or reduce the impact to groundwater and surface water. A simple reduction of exposure or impact may not be sufficient and it is not believed that this was the Air Force's intent. To clarify the intention, please consider revising Prevent or reduce in these two RAOs to Prevent or reduce to acceptable levels...	The words "to acceptable levels" were added to the first two bullets in Section 2.5 as requested.

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39.	Specific	2.5 and 2.9.4	118, 142				Remedial Action Objectives, Page 118, and Section 2.9.4, Expected Outcome of Selected Remedy, Page 142: The cleanup levels for protection of human health defined in the last sentence in this Section on page 118 and on page 142 as a hazard quotient of one for each contaminant for the residential scenario appear to conflict with the previously stated definition on page 118 that the RAO is achieved if the non-cancer hazard index is equal to 1.0. If more than one contaminant affecting the same target organ system have individual hazard quotients equal to one, the goal of achieving an overall hazard index equal to or not greater than 1 is not met, and adverse health effects may result from the exposure. Please resolve this discrepancy. Note that EPA's Risk Assessment Guidance for Superfund Part D defines chemicals determined not to contribute significantly to an unacceptable risk as those with risk levels less than 1×10^{-6} or a hazard quotient less than 0.1.	The first sentence after the bullets in Section 2.5 was deleted, and the following sentence was added as the last sentence of that same paragraph: The first RAO listed above is achieved if individual contaminant concentrations are less than or equal to these cleanup goals.
40.	Specific	2.6.3	120				Alternative 3B: The description of groundwater monitoring for Alternative 3B states that long-term monitoring frequency will be determined in accordance with the Groundwater Monitoring Program protocols, but it is not clear that these protocols will be adequately site-specific and address all contaminants. Long-term monitoring under Alternative 3B will focus on TPH, and the Groundwater Monitoring Program protocols focus on VOCs. In addition, long-term monitoring for ROD compliance at a single site may have different data quality objectives than monitoring for overall VOC plume definition. As no sites are recommended for Alternative 3B in this ROD, it is recommended that site-specific long-term monitoring protocols be developed in the ROD for future sites requiring long-term groundwater monitoring, particularly for non-VOCs.	The text has been revised as follows: "Site-specific long-term groundwater monitoring protocols will consist of tailored monitoring frequencies for each site which address all contaminants posing a threat to groundwater. In general, a groundwater sample will be collected from the nearest down-gradient groundwater well. Data Quality Objectives will be tailored to meet long-term monitoring requirements for ROD compliance"
41.	Specific	2.6.5	121				Alternative 5 - Excavation/Treatment/Backfill (Unrestricted Land Use): The text indicates that Under Alternative 5, Initial Parcel sites contaminated with non-VOCs or TPH will be excavated, the soil treated using a thermal desorption process, and the treated soil reused as backfill in the site excavation. The text indicates later in this Section that thermal desorption will not be effective for metals. For clarity, please revise the quoted sentence to indicate that thermal desorption only applies at sites with non-VOC organic and TPH contaminants.	As suggested, the first sentence has been revised as follows: "Under Alternative 5, Initial Parcel sites contaminated with only non-VOC organic and TPH contaminants will be excavated, the soil treated using a thermal desorption process, and treated soil re-used as backfill in the site excavation."

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42.	Specific	2.6.8	123				<p>Common Elements and Distinguishing Features of Each Alternative: This Section does not appear to have the level of detail recommended in the ROD Guidance, and it is not clear where in the ROD some of the missing information is provided. Examples of the elements recommended for this Section include key applicable or relevant and appropriate requirements (ARARs), long-term reliability, quantity of untreated waste, estimated time for design and construction, estimated costs, and uses of presumptive remedies and/or innovative technologies. Some of these elements are discussed in Section 2.9 for the selected remedies, but key ARARs and uses of innovative technologies are not. Please provide the missing information or a reference to where in the ROD it may be found, and consider increasing the level of detail in Section 2.6.8.</p>	<p>Text has been added to Section 2.6.8 identifying key ARARs. Innovative technologies and presumptive remedies were not used, therefore these are neither common elements or distinguishing features. The following text has been added as the last bullets of Section 2.6.8:</p> <ul style="list-style-type: none"> - Cleanup goals for the alternatives which involve remediation to unrestricted use levels (Alternatives 3A and 5) are primarily driven by protection of human health under CERCLA. - Alternatives that do not involve cleanup to unrestricted use levels (Alternatives 2 and 3B) must attain ARARs related to institutional controls. <p>The following text was inserted after the fourth sentence of the third bullet: ...and is managed as per Title 22 and Title 27 CCR for hazardous waste classification and disposal requirements.</p> <p>The following sentence was added after the bullets in Section 2.6.8. "Innovative technologies and presumptive remedies were not incorporated as part of the remedies, therefore these are neither common elements or distinguishing features and are not addressed in this section."</p>
43.	Specific	2.7.2	130			Table 2-30	<p>Summary of Estimated Costs for the Selected Alternative: This table does not provide the level of detail recommended in the ROD Guidance, such as unit costs, contingency allowances, and project management and support. The text introducing the table states that detailed cost calculations are presented in Section 2.9.3, but Section 2.9.3 refers back to Table 2-30. Please provide additional detail in the cost estimates for the selected alternatives in the ROD. In addition, please check the total costs in Table 2-30, as they do not appear to be correct.</p>	<p>The level of detail provided in the FS is difficult to briefly summarize in the ROD. Therefore, the text was revised to refer the reader to the detailed cost information discussed in the Initial Parcel Feasibility Study #1, Appendix C, Tables C-1 and C-3. Table C-1 includes the unit costs, contingency allowances, and project support costs. Total costs of the alternatives were corrected on the table. The following change was made to the text:</p> <p>Inserted the second sentence of the first paragraph of the Cost subsection in Section 2.7.2: "More detailed cost estimates for the selected remedies are provided in Section 2.9.3, and detailed cost estimates for all alternatives are presented in the LRA Initial Parcel Feasibility Study #1, Appendix C, Tables C-1 and C-3. Alternative 1 does not have any costs associated with it."</p>
1.	Other - General						<p>In the future, please use double sided pages in order to save paper.</p>	<p>As suggested, the draft final document is printed using double-sided pages.</p>

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2.	Other - General						Please rephrase: No action is necessary for non-VOC contaminants to: for non-VOC contamination, No Action is necessary for the protection of human health and the environment, or, No Action is necessary for the protection of human health and the environment, for non-VOC contamination, throughout the text.	As suggested, the text has been revised to read: "for non-VOC contamination, no action is necessary for the protection of human health and the environment."
3.	Other - General						Since TPH is excluded from CERCLA unless mixed with hazardous substances, discussion of PRL S-040 (a TPH only site) in the ROD should be limited to a simple statement (s) that the site will be addressed under State authority. There is absolutely no need to put this site through the alternatives evaluation and risk discussion process. Please revise the entire ROD to reflect this.	PRL S-040 is identified in the Declaration as requiring No Action under CERCLA. All references to PRL S-040 have been moved from the Decision Summary to Appendix B.
4.	Other - General						Please change U.S. EPA's generally acceptable risk range to ... U.S. EPA's target risk range, throughout the text. In some instances, acceptable will need to be changed to permissible risk. (See comment #5 below)	There are no references in the document to "U.S. EPA's generally acceptable risk range", so no revision was made
5.	Other - General						The statement throughout the text: the Air Force believes there are no significant threats to ... should be deleted. As EPA has previously commented on the IP Proposed Plan, statements of Air Force beliefs are irrelevant concerning human health and environmental risks. Examples can be found on pages 103 and 139. Only the facts and the resulting risk management decisions should be stated.	The document has been searched for the noted text "the Air Force believes", and it has been eliminated.
1.	Other - Specific	2.1	6				Site; please add the NPL listing date to the text and to Table 2-1.	Text and table have been revised to include the NPL listing date as 22 July 1987
2.	Other - Specific	2.1.1, 2.1.2	10, 11				Please delete references to PRL S-040.	As suggested, the reference to PRL S-040 has been removed from 2.1.1 and 2.1.2
3.	Other - Specific	2.3.1	16				Bullets: how does the last bullet address specific activities in this ROD, since the activities stated are all post ROD activities that have not yet taken place?	The indication in bold for that bullet has been removed to indicate the development of work plans is a cleanup step which occurs post-ROD.
4.	Other - Specific	2.3.3	18				SA 035 bullet: please remove proposed from the text since this is a ROD where remedies are selected as opposed to a Proposed Plan where remedies are proposed.	Section 2.3.3 has been revised and the reference to SA 035 and proposed activities at that site has been removed altogether. Please see the responses to Specific Comments 4 and 4A.
5.	Other - Specific	2.3.4	18				Please change Future Response Plans to Future Response Plans for Other non-VOC Sites.	The section title has not been revised. Instead, text has been added to the section to address future response plans for non-VOC and VOC contaminants. Please see the response to Specific Comment 5.

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6.	Other - Specific	2.3.4	19	1st			Please reword to: ... the BRAC cleanup team will evaluate the residual risk at the site. In most cases, the residual risk will be within the target risk range of (10 ⁻⁶ to 10 ⁻⁴) for Superfund sites as set forth in the NCP, Section 300.430. The residual risk will be qualitatively evaluated and may not be permissible where many individual chemicals are present so that the residual risk significantly exceeds 1x10 ⁻⁶ .	Please also see the response to HERD (Renzi) General Comment 1. As suggested, the text has been revised as follows: "the BRAC cleanup team will evaluate the residual risk at the site. In most cases, the residual risk will be within the target risk range of (10 ⁻⁶ to 10 ⁻⁴) for Superfund sites as set forth in the NCP, Section 300.430. The residual risk will be quantitatively evaluated and may not be acceptable where many individual chemicals are present so that the residual risk significantly exceeds 1x10 ⁻⁶ ."

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No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
7.	Other - Specific	2.6.2	119				<p>The following is some suggested language for ICs at least as starting point:</p> <p>Where protection of human health and the environment requires restriction of the use of the land or groundwater, institutional controls (ICs) are designed to prevent unauthorized use. Where property is to be transferred by the AF, the key IC elements include the following: Each federal deed or letter of transfer to another federal agency will include a description of the residual contamination on the property and the selected restrictions. The ICs, in the form of deed restrictions are environmental restrictions under California Civil Code section 1471 which will run with the land, as provided in California Civil Code section 1471. The Air Force will conduct annual monitoring and undertake prompt action to address activity that is inconsistent with the IC objective or use restrictions, exposure assumptions or any action that may interfere with the effectiveness of the ICs The Air Force will submit to the regulatory agencies an annual monitoring report on the status of the ICs and how any IC deficiencies or inconsistent uses have been addressed. The IC monitoring reports will not be subject to approval and/or revision by the regulatory agencies. The annual monitoring reports will be used as part of the Five Year Review to evaluate the effectiveness of the remedy. The Air Force will notify EPA and the State via e-mail or telephone as soon as practicable, but no later than two weeks after discovery of any activity that is inconsistent with the IC objective or use restrictions, exposure assumptions or any action that may interfere with the effectiveness of the ICs. Joint approval from the Air Force, USEPA and the State of California will be required for any proposed modifications of ICs described in the ROD. Before transfer of title to the property including one or more of the sites at which ICs are selected, the Air Force will execute a Land Use Covenant with the State that includes the selected restrictions. The State Land Use Covenant will be recorded before the recording of the federal deed.</p>	<p>As suggested, the provided text on IC language has been incorporated in the document within the section describing IC to be implemented by AFRPA: "Where protection of human health and the environment requires restriction of the use of the land or groundwater, institutional controls (ICs) are designed to prevent unauthorized use. Where property is to be transferred by the AF, the key IC elements include the following: Each federal deed or letter of transfer to another federal agency will include a description of the residual contamination on the property and the selected restrictions. The ICs, in the form of deed restrictions are "environmental restrictions" under California Civil Code section 1471 which will run with the land, as provided in California Civil Code section 1471. The Air Force will conduct annual monitoring and undertake prompt action to address activity that is inconsistent with the IC objective or use restrictions, exposure assumptions or any action that may interfere with the effectiveness of the ICs The Air Force will submit to the regulatory agencies an annual monitoring report on the status of the ICs and how any IC deficiencies or inconsistent uses have been addressed. The IC monitoring reports will not be subject to approval and/or revision by the regulatory agencies. The annual monitoring reports will be used as part of the Five Year Review to evaluate the effectiveness of the remedy. The Air Force will notify EPA and the State via email or telephone as soon as practicable, but no later than two weeks after discovery of any activity that is inconsistent with the IC objective or use restrictions, exposure assumptions or any action that may interfere with the effectiveness of the ICs. Joint approval from the Air Force, USEPA and the State of California will be required for any proposed modifications of ICs described in the ROD. Before transfer of title to the property including one or more of the sites at which ICs are selected, the Air Force will execute a Land Use Covenant with the State that includes the selected restrictions. The State Land Use Covenant will be recorded before the recording of the federal deed."</p>
8.	Other - Specific	2.6.8	123			Second Bullet	<p>Please reword to: Institutional controls will be required in perpetuity for Alternatives 2 and 3B because residual contamination remains above levels for unrestricted use.</p>	<p>As suggested, text has been revised as follows: "Institutional controls will be required in perpetuity for Alternatives 2 and 3B because residual contamination remains above levels for unrestricted use."</p>

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
9.	Other - Specific	2.7.2	125				Please put a page break prior to Section 2.7.2.1.	The text has been completely revised (see RWQCB General Comment 3) to remove redundant text. Section 2.7.2.1 no longer exists.
10.	Other - Specific	2.9.4	145				Unless the TPH compounds are mixed with hazardous substances, discussion of TPH should be eliminated.	TPH contamination is commingled with CERCLA contaminants at this site so it is appropriate for the discussion of TPH to remain in the text.
11.	Other - Specific	2.10	146				Statutory Determinations; the statement: For PRL S-040, the Air Force has determined that no action is required ... is incorrect. Petroleum compounds unless mixed with hazardous substances are excluded from CERCLA, therefore, the Air Force really has no determination role.	As suggested, the text has been revised to delete the reference to PRL S-040 and the Air Force's determining role in this petroleum only site.
1.	Errata	1.0	1	2nd			Site Name and Location: The acronym WIMS ID is not defined here or in the List of Acronyms. Please define WIMS ID in the text. In addition, please check the List of Acronyms for completeness, as it does not include all of the acronyms used in the text (bis2CEE, mg/kg).	As suggested, the acronym WIMS ID has been defined in the text as follows: "Work Information Management System Identification" As suggested, the Acronyms List has been reviewed for completeness to ensure all acronyms used in the document are included.
2.	Errata	2.3.3	18	2nd			Activities Proposed in this ROD, second paragraph: The first sentence of this paragraph refers to PRL S-033, but should refer to PRL S-014. Please correct the site name in the next version of the ROD.	The referenced text has been deleted. Please see Specific Comments 4 and 4A.
3.	Errata	2.4.1.7	27			Table 2-2a	The construction worker exposure point concentration for cis-1,2-dichloroethene is given as 8.19 E+10 (82 kg/l), but it appears that the concentration should have a negative exponent. Please check the formulas in the table.	The exposure point concentration for cis-1,2-dichloroethene as noted in Table 2-2a was incorrect. The correct value is 8.19E-10. The table (Table A1-1b) has been revised accordingly.

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: U.S. EPA – Glenn Kistner

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
4.	Errata	2.4.2.4	48		first bullet		Metals: The first sentence refers to the introduction of this appendix for discussion of arsenic SW6010 analyses, which appears to be a carryover from another document. Please provide a proper reference.	<p>Please also see Specific Comment 17. The text has been revised as follows:</p> <p>Arsenic was analyzed in soil samples from 10 locations using Method SW6010, and at two adjacent locations using SW7060. (See Section 2.4.1.4 for a discussion of possible analytical bias for arsenic analyzed by method SW6010.) The samples for SW7060 analysis were located immediately adjacent to the highest reported concentrations of arsenic from the SW6010 analysis (Final OU B RICS, Vol 4 of 9, soil data, pgs 1-8). The side-by-side comparison indicates an apparent high bias interference exists for the SW6010 arsenic data. In PS33H004, located on the south side of building, the SW6010 value for arsenic is 17 mg/kg. The adjacent sample analyzed with SW7060 is 5.26 mg/kg. Likewise on the east side of the building PS33H008 had a SW6010 arsenic value of 18 mg/kg, and an SW7060 value of 4.6 mg/kg. The "combined" background concentration for arsenic is 4.9 mg/kg. Therefore, although the SW6010 data appear to be biased high, the SW7060 results suggest that results are within or slightly exceeding background concentrations, and no data gap for arsenic exists.</p>
5.	Errata	2.7.2.1	125				PRL S-014: The first sentence refers to Figure 2-29, but there is no Figure 2-29. It appears that the reference should be to Table 2-29. Please correct the reference.	The text has been changed to read "Table", not "Figure". Please also see the response to Other Specific Comment 9.

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: RWQCB – James D. Taylor

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	General						<p>Applicable or Relevant and Appropriate Requirements (ARARs):</p> <p>Regional Board staff has reviewed Section 2.10.2 of the ROD, and conclude that several Regional Board ARARs are not properly identified and included in Tables 2-34 and 2-35. Section 2.10.2 is also lacks a detailed narrative discussion of ARARs compared with other RODs prepared by the Air Force. The narrative discussion usually presents the basis for ARARs as they pertain to specific sites and selected remedial actions including appropriate 'To Be Considered' (TBC) guidance documents (e.g., A Compilation of Water Quality Goals and The Designated Level Methodology for Waste Classification and Cleanup Level Determination). Issues in the ROD regarding the inclusion and status of ARARs (i.e., applicable vs. relevant and appropriate) should be presented to the Legal Tiger Team for discussion. The Legal Tiger Team should also determine the need for any clarifying language, footnotes, or other means of presenting differing interpretations or positions on the status of certain ARARs in the ROD. We suggest that the Legal Tiger Team meet to resolve these issues prior to the issuance of the draft final ROD, so the draft final ROD can incorporate the agreements reached by the respective attorneys.</p> <p>In addition, our previous comments to the Feasibility Study (FS, letters dated 21 January, and 3 July 2003), suggested that the ARAR tables should be revised to include a column (titled Associated Sites) that identifies the sites that a particular ARAR applies to (see Former Mather AFB RODs for examples). The ROD does not, but should, address this comment.</p> <p>Specifically, the following critical ARARs must be evaluated for inclusion into the ROD: The narrative toxicity objective for groundwater in Chapter III of the Water Quality Control Plan (Basin Plan) for the Sacramento River and San Joaquin River Basins. Basin Plan Policy for Investigation and Cleanup of Contaminated Sites Basin Plan Policy for Application of Water Quality Objectives State Water Resources Control Board (SWRCB) Resolution No. 68-16 Antidegradation Policy SWRCB Resolution No. 88-63 Sources of Drinking Water Policy Title 27, CCR Section 20090(d), Section 20080(d), 20385-20435, 20385, 20405, 20410, 2042.</p>	<p>Per the meeting held 15 January 04 with AFRPA McClellan BEC Paul Brunner and RWQCB representatives James Taylor and John Russell, an agreement was reached whereby the ARARs section of the ROD will remain as presented in the Draft IP ROD document. The following text has been added to section 2.10.2 Compliance With ARARS, to explain how by achieving the very low health-based cleanup levels in this ROD we will also assure the protection of water quality:</p> <p>"The remedial actions to be accomplished based on this ROD will achieve the appropriate chemical-specific cleanup levels for protection of human health, groundwater, and surface water. Therefore the remedy will be protective of both human health and water quality, and will comply with associated ARARs."</p>

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: RWQCB – James D. Taylor

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
2.	General						<p>Threats to Water Quality:</p> <p>The ROD addresses threats to water quality; however, these discussions are contained within several sections throughout the document and not clearly identified or easily found. Regional Board staff prefers that discussions on water quality be included in a clearly identified separate section that addresses all potential threats to surface and groundwater quality for all of the ROD sites. The sections titled 'Basis for Action' should summarize any conclusions reached regarding potential threats to water quality.</p> <p>If TPH contamination is present at a particular site, the ROD should also clearly state whether the TPH contamination is commingled with CERCLA contaminants. If CERCLA contaminants are commingled with TPH, then the TPH contamination will be addressed under CERCLA. If no TPH commingling is evident, then the petroleum exclusion applies and the TPH contamination will be addressed under State requirements. These petroleum-only sites will be addressed as 'No-Action sites under CERCLA. These types of sites are identified in the ROD, however, the discussions should be more consistent and given greater visibility by including them in a separate discussion as suggested above. Please revise the ROD accordingly.</p>	<p>Response to first paragraph of comment: Text has been inserted in the Basis of Action subsection for each site to summarize potential impacts to surface water and groundwater quality. In addition, a new section has been added to the ROD: Section 2.4.7, Summary of Potential Impacts to Groundwater and Surface Water:</p> <p>"Potential impacts to water quality have been identified at two of the seven ROD sites: PRL S-014 and SA 003.</p> <p>At PRL S-014, concentrations of the non-VOC contaminant of concern, PCB-1260, in shallow soil exceed the cleanup level for the protection of surface water, therefore impacts to surface water are possible. However, the maximum concentration of PCB-1260 does not exceed the cleanup goal for the protection of groundwater. Thus, there were no potential impacts to groundwater identified at this site.</p> <p>At SA 003, concentrations of lead, TPH-D, and TPH-G exceed their respective cleanup levels for the protection of surface water. Therefore, non-VOC contamination at this site may impact surface water quality. In addition, concentrations of TPH-G and TPH-D exceed cleanup levels for the protection of groundwater. Therefore, impacts to groundwater are possible. Metals contamination in soil is commingled with the fuels-related contamination at this site.</p> <p>Based on a review of the maximum contaminant concentrations in comparison with cleanup goals, impacts to surface water and groundwater quality were not identified at the remaining four sites."</p> <p>Response to second paragraph of comment: Several changes have been made to the ROD to address this comment. Details regarding the characterization of contaminants and risk at PRL S-040 (a site with solely fuel related contamination) have been moved to Appendix B from the Decision Summary (Section 2). In addition, the following changes have been made to the Declaration: 1) Inserted as the second paragraph of Section 1.1 - If TPH contamination at a site is commingled with other contaminants regulated under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), then the TPH contamination is</p>

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: RWQCB – James D. Taylor

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
								<p>addressed in this ROD with the non-VOC contaminants. If commingling of TPH and CERCLA contaminants is not evident, then the remedy for that site is identified as No Action in this ROD and the TPH contamination is addressed under State requirements.</p> <p>2) The first sentence of Section 1.2 has been rewritten as follows - As a result of past industrial activities, releases of hazardous substances have contaminated soil at Study Area (SA) 003 and Potential Release Location (PRL) S-014. At SA 003, metals contamination is commingled with TPH contamination in soil, and at PRL S-014 PCB contamination is present in soil.</p> <p>3) The following sentence has been added as the last sentence of the fourth paragraph of Section 1.3 and the second to last sentence of Section 1.4 - Because the TPH contamination at PRL S-040 is not commingled with CERCLA contaminants, details regarding the characterization of contaminants and risk at this site are provided in Appendix B rather than in the Decision Summary (Section 2) of this ROD.</p>
3.	General						<p>ROD Format: Overall, Regional Board staff believes that the ROD is too long for the small number of sites that are included. Every effort should be made to consolidate information, break the ROD up into clearly defined sections that address each site within that section, and reduce the number of tables. There are several examples of accepted formats for Air Force RODs that include a large number of sites. The Remedial Project Managers should confer and reach a consensus on the format of the Draft Final ROD at the earliest convenience.</p>	<p>As suggested, the revised ROD has been reconfigured and streamlined. Three example RODs were reviewed to determine where specific reconfiguring and consolidation could be done more appropriately. The majority of the risk discussion and associated tables have been removed from the body of the document and placed in a supporting appendix. The fuels only site, PRL S-040, has been pulled from the body of the document and placed in a separate supporting appendix as well. The Comparative Analysis of Alternatives was rewritten and edited to remove redundant text.</p>
1.	Specific	2.2	13			First bullet	<p>Administrative Record (AR): This bullet item would benefit by including the location (address) of the main AR repository. Also in the last sentence, documents related to the cleanup efforts at McClellan also are available for review at the RWQCB office, as well as the DTSC and EPA offices. Please revise this sentence to include the RWQCB office.</p>	<p>As suggested, the location (address) of the main AR repository has been added to the text as well as the inclusion of the RWQCB in the sentence listing the other locations for document review.</p> <p>"The location of this repository is within the AFRPA office, 3411 Olson St. McClellan CA 95652 Documents related to the cleanup efforts at McClellan also are available for review at the State of California DTSC, RWQCB, and in the U.S. EPA offices."</p>

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: RWQCB – James D. Taylor

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
2.	Specific	2.4	19			Site Characteristics	See General Comment 2. This section should be revised to include a separate stand-alone section that describes threats to surface water and groundwater quality. Please revise this section and the rest of the ROD accordingly.	Please see the response to General Comment 2.
3.	Specific	2.4.1.4	24			SVOCs and TPH	<p>This section should be revised to clarify whether the occurrence of concentrations of TPH-G, TPH-D, BTEX, and MTBE are confirmed detections (i.e., hits), or are concentrations at or below detection limits. The reference to the detection of MTBE in a soil boring of less than 250 ug/L does not indicate the depth at which MTBE occurred. Concentrations of MTBE of greater than 28 ug/kg in surface soils (RWQCB Region 2, December 2001 Update to Risk-Based Screening Levels for Impacted Soil and Groundwater) at depths less than or equal to 3 meters below ground surface (bgs) may pose an indoor air health risk, exceeding criterion for determining if 'Residential Land Use is Permitted'. If the detection is confirmed to be less than or equal to 3 meters bgs, then this contamination may require an institutional control and/or be addressed for remediation under appropriate Federal or State requirements.</p> <p>The Department of Toxic Substances Control (DTSC) has requested that the Board ensure that the cleanup levels for TPH and other petroleum constituents at UST sites are protective of human health as well as water quality. We have submitted a proposal for DTSC's review and comment to address this issue. We will continue to coordinate with DTSC and the AFRPA to resolve this issue in a timely manner. Guidance on this matter as it pertains to the ROD will be provided at the earliest opportunity. In the meantime, the ROD should be revised to acknowledge this issue.</p>	<p>None of the analytes were detected in the samples. The seventh sentence of the second paragraph under the heading SVOCs and TPH has been rewritten as follows: Fuel releases from the USTs do not appear to have been significant because no contaminants were detected in the confirmation samples from the former vicinity of the USTs. Detection limits for TPH-G and TPH-D were 1 mg/kg, 5 ug/kg for BTEX compounds, and between 5 and 250 ug/kg for MTBE. The highest detection limit for MTBE was from a sample collected at 5 feet bgs (at location H2-5). However, no other contaminants were reported in that sample or in two adjacent soil gas samples (with the exception of carbon tetrachloride discussed in the next subsection) collected at 7 feet bgs during the RI (PLS14PR001 and PLS14PR003).</p> <p>Coordination is ongoing between RWQCB and DTSC to ensure that cleanup levels are protective of human health.</p>
4.	Specific	2.4.2.5	49			Contamination Exposure and Migration	See General Comment 2. This section should be revised to clearly state that no threats to surface water or groundwater remain at the site.	The following sentence has been added as suggested: "There are no threats to surface water or groundwater remaining at this site."
5.	Specific	2.4.4.7	81			Basis for Action	See General Comment 2. This section should be revised to clearly state if TPH is commingled with CERCLA contaminants, and therefore, will be cleaned up under CERCLA.	As suggested the following sentence has been added to the section (now 2.4.3.7): "At this site TPH contamination is commingled with CERCLA contaminants, and therefore, will be cleaned up under CERCLA."

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: RWQCB – James D. Taylor

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
6.	Specific	2.4.5.5	84			Contamination Exposure and Migration	See General Comment 2. This section should be revised to clearly state that no threats to groundwater remain at the site. The threat to surface water is addressed.	As suggested, the section (now 2.4.4.5) has been revised to reflect the additional site characterization that took place at this site with the following text: "Potential future exposure of residents or workers to near surface contaminated soil has been significantly reduced at this site through limited soil removal as part of additional site characterization sampling during December 2003. As a result, at this site no threats to human health, groundwater, or surface water remain."
7.	Specific	2.4.7.5	109			Contamination Exposure and Migration	See General Comment 2. This section should be revised to clearly state that no threats to surface water or groundwater remain at the site.	As suggested the following sentence has been added as the last sentence to the section (now 2.4.6.5): "In addition, the low levels of non-VOC contaminants at the site do not present a threat to surface water or groundwater quality."

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	General						<p>Last year, after extensive negotiations meant to resolve the difficulty of reviewing McAFB investigation reports (e.g., RICS) that predominantly only contain limited characterization information, McAFB agreed to provide detailed references in reports containing limited characterization information. The IP #1 ROD doesn't comply with this agreement. For example, the default identification of the RICS as the source of investigation information for the individual sites in Section 2.1.2 is misleading since the RICS often just summarize the results of various investigation phases. Because the RICS often only present a summary of results, the reviewer has to go on a 'document chase' trying to identify where the actual source information is located. We note that Sections 4.0.4 through 4.0.7 provide a listing of all source documents for each site. At a minimum, the text in Section 2.1.2 should direct the reader to these sections for a detailed list of documents for each site.</p>	<p>As suggested, and agreed to previously, more detailed referencing has been added to the draft final document. References have been placed at the beginning of the site characterization sections that include section and page numbers of the referenced documents to more clearly direct the reader to the appropriate source information.</p>
2.	General						<p>In a comment on the draft final FS, we requested that McAFB address the USTs reported at IRP sites PRL S-014 and SA 35. DTSC has not been provided information on these tanks since they were investigated under the McAFB fuels program. McAFBs response was these USTs would be handled under the VOC ROD. This approach is confusing since Section 1.1 clearly states that petroleum hydrocarbons would be handled in the IP #1 ROD. To add to the confusion, the text in Section 2.4.1.1 states that one of the tanks at PRL S-014 may have contained waste solvents which indicates the potential presence of non-VOCs which we believe is the basis of this ROD. Compounding the confusion is the presentation of some PRL S-014 UST characterization information in the last paragraph on Page 24. Since DTSC has not been provided any information on these USTs (with the exception of the information on Page 24), we are unable to assess whether the USTs were adequately characterized to evaluate risk. Additionally, the categorization of these USTs needs to be clear and logical.</p>	<p>The text providing information about the USTs at site PRL S-014 has been revised to clearly and logically present known data available for the site. Based on the data available, the PRL S-014 UST site has been adequately characterized. Please see EPA Specific Comment #7.</p>

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
3.	General						<p>Because of the numerous documents under review and the many other regulator activities required for the McAFB project due to the aggressive program schedule; DTSC has had difficulty meeting document review schedule dates. McAFB has indicated in recent meetings and letters that they no longer will accommodate our limitations at meeting program schedules and for some documents will proceed to the next draft without our input. DTSC has taken several steps to alleviate the backlog of documents under review; however due to the aggressive schedule, limitations will continue in the foreseeable future. One of the mitigation steps implemented in the IP #1 ROD review is we did not verify site background and characterization specifics (i.e., Sections 2.1 and 2.4), under the assumption that the information provided is accurate and presents the information clearly so that readers can understand the issues. We take this step with some caution; as a significant number of recent McAFB documents have had inaccuracies or presented the information in an unclear manner; which required our review to point out these problems. We expect that the burden is on McAFB to take the necessary steps to limit these problems.</p>	<p>The Air Force appreciates the DTSC efforts to maintain review schedules and we will do all we can to ensure clarity and accuracy are maintained in the document.</p>
4.	General						<p>In the IP #1 Feasibility Study we indicated that we believed a Land Use Control Implementation Plan (LUCIP) would be required as part of any ROD that incorporated institutional controls (ICs) in the remedy. Assuming that the preferred alternatives are implemented for the sites in this ROD, there will be no ICs related towards non-VOCs. However, in tandem with this ROD, McAFB is developing a FOSET that will transfer two of the IP #1 ROD IRP sites (SA 91 and PRL S-033). Because of the VOC groundwater and possible VOC soil gas contamination, ICs for these sites will be necessary. Accordingly, a LUCIP will be required for these sites. We considered requesting a LUCIP with the FOSET, but recognize that the LUCIP should be associated with a ROD. With the VOC ROD not expected to be finalized until at least May 1995, there will be a period of time between property transfer (via FOSET) and the ROD where there will be no LUCIP to properly manage and coordinate the ICs. Although we recognize this potential deficiency, we believe that McAFB's current IC program will be sufficient to properly manage ICs for these sites until the VOC ROD is in place. We expect that a LUCIP detailing the management of the ICs related to VOC contamination will be a primary document associated with the VOC ROD.</p>	<p>The Air Force appreciates DTSC's willingness to accept that McClellan's current IC program will be sufficient to properly manage ICs for these sites until the VOC ROD is in place.</p> <p>With respect to the State's expectation that a LUCIP detailing the management of the ICs related to VOC contamination will be a primary document associated with the VOC ROD, the Air Force position is that the Air Force will implement its non-primary, non-enforceable LUC/IC Management Plan for the Management of ICs within the appropriate ROD process. The RODs will contain performance measures for ICs. The Air Force position at this time is that this LUC/IC Plan is a non-enforceable document.</p>

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
5.	General						<p>This document, like many recent related documents makes the general statement that all the Method 6010 metals analysis are unreliable for arsenic, cadmium, and other metal. This outright dismissal of all Method 6010 analysis is untrue and needs to be purged and replaced with a correct statement indicating that some of the early Method 6010 metals analysis appear to be biased high due to interference. Specifically, the early RI investigation data (give specific time-frame) may be biased. Furthermore, the data shown not to be biased should be used in site characterization. McAFB needs to further demonstrate that no metals data gaps are present at those sites where the metals analyses have been discarded.</p>	<p>The ROD text discussions (2.4.1.4) on Method SW6010 data has been revised as follows. The first sentence of the second paragraph in the Metals subsections was replaced with the following text.: "Arsenic and cadmium were typically analyzed by Method SW6010 in phase I of the RI (prior to 1995), then later by Methods SW7060 and SW7131, respectively. The change was made to SW7060 and SW7131 during phase II of the RI because inter-element interferences were found to sometimes bias high SW 6010 results for certain elements, such as arsenic and cadmium. The SW7000-series analyses are element specific and therefore not prone to interference effects."</p> <p>Specific site characterization text has been revised where appropriate to indicate where the 6010 data was not biased high and was therefore used in site characterization. Where biased high data does appear to exist (PRL S-014 and PRL S-033), and is suspected to be unreliable, the text discusses whether metals data gaps are present at those sites (as a result of 6010 data being discarded) and how any data gaps will be resolved by future actions.</p>
6.	General						<p>When reporting/summarizing risks the ROD needs to clearly identify the risk components (e.g., pathways, types of compounds). Currently, it is not easy to discern whether groundwater exposure is factored into the summaries.</p>	<p>See the response to Specific Comment 4.</p> <p>The ROD text is revised when reporting and summarizing site risks to clearly identify the applicable risk components (e.g., pathways and types of compounds) and specifically whether groundwater exposure has been factored into the summaries.</p>
7.	General						<p>As a compromise between DTSC and McAFB, the IP #1 ROD contains detailed risk assessment information for selected sites. This greatly enhances the size of the ROD and makes the document more burdensome for public review. Consistent with our earlier position, we believe that the detailed, comprehensive risk assessment for each site should be provided in the RICS or the FS and anticipate that McAFB will implement this approach for future RODs.</p>	<p>As suggested, future FS documents will contain the comprehensive risk assessment as applicable for each site. For purposes of streamlining this ROD, and future RODs, the bulk of the risk assessment information has been placed in a new appendix at the back of the ROD document.</p>
8.	General						<p>In our review, we encountered numerous grammatical and technical errors. Please incorporate a thorough QA/QC review of the next draft so that the errors are corrected.</p>	<p>As suggested, a thorough QA/QC review of the draft final document will be performed before issuance to ensure any grammatical and technical errors are corrected.</p>

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
9.	General						We noted that California Health and Safety Code Section 25202.5, California Civil Code Section 1471 and California Code of Regulations Section 67391.1 (i.e., the State LUC) was deleted from the list of ARARs that was presented in the Final IP #1 FS. We assume this removal was due to McAFB selecting Alternative 3A for those sites requiring remediation. Although we recognize that the sites will be cleaned up to unrestricted use for Non-VOCs, and therefore acknowledge State LUCs may not be necessary with this ROD; we will require State LUCs for the early transfer of this property via FOSET and with the VOC ROD due to the presence of VOC contamination. Please be aware that we are still researching the applicability of including the State LUC in this ROD and may provide a later supplemental comment on this issue.	As the comment suggests, the cited provisions are not relevant to these sites because they are being cleaned up to unrestricted use levels and need not be referenced in this document. In other documents, for other sites, they may be appropriate.
1.	Specific	2.3.1	16	1st			The text states that sites with radiological contamination are excluded from the Initial Parcel (IP). This implies there is no suspected radiological contamination at any location with the IP. Please verify this.	At this point in time all known and/or suspected radiological sites have been identified and carved out of the Initial Parcel RODs. If at some point in the future a new radiological concern is identified at an Initial Parcel site, that site will be carved out and addressed in a subsequent ROD.
2.	Specific	2.3.1	16				Bullet List: We suggest text be added to reflect McAFB's dynamic environmental program which periodically undergoes changes to reflect new information and increase program efficiency. Recent examples include the breakups of the Initial Parcel and VOC RODs into smaller focused RODs.	An additional bullet has been added as follows: Due to McClellan's dynamic environmental program, periodic cleanup program strategy revisions (like the breakups of the Initial Parcel and VOC RODs) are made to reflect new information and increase program efficiency.
3.	Specific	2.4.1.4	23			Fig. 2-6	Our copy of this figure is of poor quality. Please make sure this and successive figures are clear.	All figures have been reviewed. Where necessary to improve clarity, the figures have been revised or printed on larger paper.
4.	Specific	2.4.1.7	37				Uncertainties. Based on the information presented in the IP #1 ROD, arsenic was detected at concentrations that appear greater than background at selected locations. These detections were in samples analyzed by EPA Method 6010 which are considered suspect. We do not have confirmation samples using EPA Method 7060 at the same location(s), or in the immediate vicinity of the samples with elevated arsenic detection. This should be considered an uncertainty in the data review.	A new bullet has been added to speak to the uncertainty associated with arsenic results from EPA method 6010 Arsenic was detected at concentrations that appear greater than background at selected locations. These detections were in samples analyzed by EPA Method 6010, which are considered suspect. Other samples were analyzed using EPA Method 7060, but not from the same location(s), or in the immediate vicinity (i.e., within 40 feet) of the samples with elevated arsenic concentrations, so an uncertainty regarding arsenic as a contaminant is introduced. Since SW6010 data were not used for the risk assessment, the risk may be underestimated.

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
5.	Specific	2.4.2.4	48	Top			Explain to the reader what 'combined background concentrations' are.	The following text has been added in Section 2.4.1.4 following the first reference to combined background: "Combined" background concentrations are background values for naturally occurring elements (e.g., metals and minerals) which have been established specifically for McClellan. These background values were established for separate lithologies (i.e. sands vs. silts and clays). Since soils at McClellan tend to be a mixture of these lithologies, the "combined" background concentration represents a statistical combination of all the background values in the data set for each element.
6.	Specific	2.4.2.7	53				Uncertainties: for PRL S-033. An additional uncertainty would be the lack of sampling below the building foundation. Although a site inspection noted no apparent spills in the building, the possibility exists that leaks from drums may have occurred and the contents may have migrated through foundation cracks to the subsurface.	Additional text has been added to the uncertainty discussion in Appendix A: "Although a site inspection noted no apparent spills in the building, the possibility exists that leaks from drums may have occurred and the contents may have migrated through foundation cracks to the subsurface. This results in an uncertainty because sampling was not conducted beneath foundation cracks. Sampling was conducted however, beneath the exposed building foundation during the removal action, and results were non-detect for PAHs."
7.	Specific	2.4.2.7	54			Table 2-10 and 2-11	Make it clear that these risk values are post-removal action.	A footnote has been added to indicate the risk values presented in these two tables (Table A2-4 and A2-5) are post-removal action.
8.	Specific	2.4.3.4	59				VOCs: Indicate the likely source of the halogenated VOCs and provide evidence that there is no commingling of petroleum derived contamination and other contamination at the site.	The following text has been added to the end of the first paragraph of the VOC subsection in Appendix B: No other contaminants (e.g., VOCs or fuels) were detected in the samples with detections of Freon. There is no known source of the Freon contamination. The following sentence has been added as the second to last sentence of the second paragraph of the VOC subsection: The TCE contamination in groundwater is likely from source upgradient of PRL S-040.
9.	Specific	2.4.3.7	64				Toxicity Assessment: The text should discuss that although significant concentrations of fuel products are present, a risk assessment wasn't completed, as there are no definitive means of assessing toxicity from exposure to fuel.	Additional text has been added as suggested in Appendix B: Although significant concentrations of fuel products are present, the risk assessment does not include the TPH data, as there are no definitive means of assessing toxicity from exposure to fuel.

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Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
10.	Specific	2.4.4.4	80	2nd			If it hasn't already been done previously in the ROD, please clearly define 'target volume'.	In section 2.4.3.3, "target volume" first appears and is defined with the following added text: "Target volume refers to the engineering estimate of the amount of soil within the contaminant plume."
11.	Specific	2.4.4.7	81	2nd	1st		Basis for Action: Since overall site contamination is factored into our cleanup decision(s), we request that you insert ,VOCs between metals and and.	As suggested, "VOC" has been added between the words "metals" and "and" in Section 2.4.3.7.
12.	Specific	2.4.7.3	106		2nd		Please verify the accuracy of this list. Consistent with our General Comment 3, above, we did not review the accuracy of site background and characterization specifics.	As suggested the list of analytes was verified and the list accurately reflects the sampling that took place in 1988.
13.	Specific	2.4.7.4	108			Fig 2-14	Edit the figure so it is clear where SA 091 is located.	The figure has been revised to distinguish the boundary of SA 091.

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Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
14.	Specific	2.4.7.4	115				<p>Bullet List: Please make the format for summarizing risk for all the (preceding) sites in the ROD consistent with the format presented for this site (SA 091). This format is much easier to view than that used for the other reported sites.</p>	<p>Revised and Inserted the following text in the Risk Characterization Section after the paragraph describing Table A1-4 :</p> <p>The potential cancer risks for PRL S-014 (South) are as follows: Future adult resident (0-2 feet bgs depth interval) and groundwater: 8×10^{-5} Future adult resident (0-10 feet bgs depth interval) and groundwater: 1×10^{-4} Outdoor occupational worker: 3×10^{-6} Indoor occupational worker: 1×10^{-8} Future construction worker: 2×10^{-6}</p> <p>The main contributor to the cumulative risks for the residential scenarios is the ingestion of arsenic in homegrown produce. Potential risks associated with VOCs and PCBs in soil were all below 1×10^{-6}. Potential risks associated with VOCs in groundwater were 2×10^{-6}.</p> <p>The potential cancer risks in soil for PRL S-014 (North) are as follows: Future adult resident (0-2 feet bgs depth interval): 5×10^{-5} Future adult resident (0-10 feet bgs depth interval): 2×10^{-5} Outdoor occupational worker: 5×10^{-6} Future construction worker: 4×10^{-7}</p> <p>The sole known contaminant in the North is Aroclor 1260, and the main pathway contributing to the risk estimates for the residential scenarios in the North is the homegrown produce pathway. These risk estimates are within or below USEPA's risk management range.</p> <p>Table A1-5 presents the noncancer HIs for the two exposure areas and the various exposure scenarios and exposure routes at PRL S-014. The potential noncancer risks for PRL S-014 (South) are as follows:</p> <p>Future adult resident (0-2 feet bgs depth interval): <1 Future adult resident (0-10 feet bgs depth interval): <1</p> <p>Future adult resident (0-2 feet bgs depth interval excluding the produce pathway): <1 Future adult resident (0-10 feet bgs depth interval excluding the produce pathway): <1</p>

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Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
								<p>Future adult resident (0-2 feet bgs depth interval) and groundwater: <1 Future adult resident (0-10 feet bgs depth interval) and groundwater: <1</p> <p>Future child resident (0-2 feet bgs depth interval): 1.4 Future child resident (0-10 feet bgs depth interval): 1.8</p> <p>Future child resident (0-2 feet bgs depth interval excluding the produce pathway): <1 Future child resident (0-10 feet bgs depth interval excluding the produce pathway): <1</p> <p>Future child resident (0-2 feet bgs depth interval) and groundwater: 1 Future child resident (0-10 feet bgs depth interval) and groundwater: 2</p> <p>Indoor occupational worker: <1 Outdoor occupational worker: <1 Future construction worker: <1</p> <p>The potential for adverse noncancer health affects for the adult resident and worker scenarios is unlikely. However, the main contributor to the hazard index for the child residential scenario is the hazard quotient for arsenic for the homegrown produce pathway.</p> <p>The potential noncancer risks for PRL S-014 (North) are as follows:</p> <p>Future adult resident (0-2 feet bgs depth interval): 2 Future adult resident (0-10 feet bgs depth interval): <1</p> <p>Future adult resident (0-2 feet bgs depth interval excluding the produce pathway): <1 Future adult resident (0-10 feet bgs depth interval excluding the produce pathway): <1</p> <p>Future child resident (0-2 feet bgs depth interval): 8 Future child resident (0-10 feet bgs depth interval): 3</p> <p>Future child resident (0-2 feet bgs depth interval excluding the produce pathway): 3 Future child resident (0-10 feet bgs depth interval excluding the produce pathway): 1</p> <p>Outdoor occupational worker: <1</p>

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Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
								<p>Future construction worker: <1</p> <p>There is a potential for adverse noncancer health effects from exposure to soil for the adult resident (0-2 feet bgs depth interval) and the child resident scenarios. The main pathway contributing to the HIs for these residential scenarios is the homegrown produce pathway.</p> <p>For PRL S-033, inserted the following text at the end of the Risk Characterization Section (delete the last paragraph of this section):</p> <p>Tables A2-4 and A2-5 present the potential cancer risk estimates and the noncancer HIs, respectively, for the residential exposure scenarios at PRL S-033. The potential cancer risk for soil is as follows:</p> <p>Future adult resident (0-5 feet bgs depth interval): 6 x 10⁻⁷</p> <p>The potential noncancer risks for soil are as follows:</p> <p>Future adult resident (0-5 feet bgs depth interval): <1 Future child resident (0-5 feet bgs depth interval): <1</p> <p>The risk estimates for the residential scenarios are below U.S. EPA's risk management range. These risk estimates are based on a reasonable maximum exposure and were developed taking into account various conservative assumptions about the frequency and duration of the receptor exposure to soil and the toxicity of the COCs. These risk and hazard estimates were for PAHs only. Metals and VOCs were excluded from the assessment, as they were not within the exposure area.</p> <p>Revised and inserted text as follows for site PRL S-040 in Appendix B: The potential cumulative cancer risks (soil and groundwater risks) for PRL S-040 are as follows: future adult resident (0-2 feet bgs depth interval of soil plus groundwater): 5 x 10⁻⁶ future adult resident (0-10 feet bgs depth interval of soil plus groundwater): 5 x 10⁻⁶</p>

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Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
								<p>Future adult resident (0-2 feet bgs depth interval): 3 x 10⁻⁷ Future adult resident (0-10 feet bgs depth interval): 3 x 10⁻⁷</p> <p>Outdoor occupational worker: 2 x 10⁻⁸ Indoor occupational worker: 3 x 10⁻⁹ Future construction worker: 4 x 10⁻⁹</p> <p>Added the following text to the last sentence in the second paragraph: However, benzo(a)anthracene was the primary contributor to soil risk.</p> <p>Revised and inserted the following text:</p> <p>The potential noncancer risks for PRL S-040 are as follows:</p> <p>Future adult resident (0-2 feet bgs depth interval) and groundwater: 2 Future adult resident (0-10 feet bgs depth interval) and groundwater: 2</p> <p>Future child resident (0-2 feet bgs depth interval) and groundwater: 2 Future child resident (0-10 feet bgs depth interval) and groundwater: 1</p> <p>Indoor Occupation worker: <1 Outdoor Occupational worker: <1 Future Construction worker: <1</p> <p>The main COCs that contribute to the HIs greater than one are naphthalene and 1,2,4-trimethylbenzene, and presumed household uses of groundwater are the primary contributing pathways.</p> <p>Revised and inserted the following text in Appendix A:</p> <p>The potential cancer risks for SA 035 are as follows:</p> <p>Future adult resident (0-2 feet bgs depth interval) and groundwater: 2 x 10⁻³</p>

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Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
15.	Specific	2.4.7.7	115				<p>Uncertainties: Please justify why the groundwater risk has not been quantified. Based on our understanding of our agreement with McAFB; all risks are to be identified and the risk managers will assess which components are relevant to the overall risk values.</p>	<p>Future adult resident (0-10 feet bgs depth interval) and groundwater: 5 x 10⁻⁴</p> <p>Outdoor Occupational Worker: 5 x 10⁻⁶ Indoor Occupational Worker: 2 x 10⁻⁷ Future Construction Worker: 1 x 10⁻⁶</p> <p>The risk estimates for the residential scenarios exceed USEPA's risk management range. The primary contributor to the potential cancer risks is the homegrown produce pathway for bis(2-chloroethyl)ether. The risk estimates for the worker scenarios, however, are within or below USEPA's risk management range.</p> <p>Tables A3-5 presents the noncancer HIs for the various exposure scenarios and exposure routes at SA 035. The potential noncancer risks are as follows:</p> <p>Future adult resident (0-2 feet bgs depth interval) and groundwater: 2 Future adult resident (0-10 feet bgs depth interval) and groundwater: 1</p> <p>Future child resident (0-2 feet bgs depth interval) and groundwater: 4 Future child resident (0-10 feet bgs depth interval) and groundwater: 4</p> <p>Outdoor occupational worker: <1 Indoor occupational worker: <1 Future construction worker: <1</p> <p>The main contributors to the HIs for the residential scenarios are VOCs in groundwater and arsenic in soil (homegrown produce pathway). For the worker scenarios, the HIs are less than one indicating that the potential for adverse noncancer health effects for those receptors are unlikely.</p> <p>Groundwater risks have been quantified and added to Appendix A, Section 4.</p>

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Comment By: DTSC – Kevin Depies

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
16.	Specific	2.7.2.1	129	6th	Last		Please explain the basis for the statement that roles and responsibilities of the entities is least clearly defined for Part 2C (SLUC). DTSC and the Air Force have been negotiating SLUCs at this and other Air Force bases for more than a few years now and DTSC has distributed a working copy SLUC for this ROD for review by McAFB. The roles and responsibilities in the working copy SLUC are no less defined than other McAFB documents discussing the implementation of ICs at the base.	Air Force policies have recently changed and the Air Force is now prepared to sign the SLUC. In light of this, the sentence has been deleted.
17.	Specific	2.7.2.1	130				Please fix the font for the text following the table	The font has been corrected.
18.	Specific	2.7.2.1	130				State Acceptance: Modify the text to reflect that we believe Alternative 3A is a better alternative than 2 because it costs substantially less and remediates the contamination.	As requested, the text has been revised to reflect that, "the State believes Alternative 3A is better than Alternative 2 because it costs substantially less and remediates the contamination."
19.	Specific	2.7.2.2	134	1st	Last		Specific comment 16 applies also to this sentence and to page 138, 3rd Pgph., last sentence.	As noted in comment 16, the sentence has been deleted in both locations. (Section 2.7.2 has been significantly rewritten to reduce redundant text.)
20.	Specific	2.7.2.2	134				State Acceptance: Similar to Specific comment 18; change the text to reflect our position that the State's preference is Alternative 3A over Alternative 2, not that we do not support Alternative 2.	As requested, the text has been revised to reflect that, "the State believes Alternative 3A is better than Alternative 2 because it costs substantially less and remediates the contamination."
21.	Specific	2.9.1	139				Last Bullet: A greater level of detail for the summary for site SA 035 is required. The text should note that COCs are present in the site resulting in a health risk greater than 1×10^{-6} .	The bullet has been revised to incorporate results of the additional site characterization performed at SA 035 indicating non-detect for Bis2CEE and background values for arsenic.
22.	Specific	2.10.4	156	4th	2nd		Costs: 2nd Sentence. This statement is contradicted by earlier statements that place the cost for Alternative 5 on the order of \$220,000 which is less than twice the cost estimate for Alternative 3A.	For Alternative 5, soil is treated onsite and the total cost is \$820,000. Also discussed is a variation of Alternative 5 for which soil could potentially be treated off site for significantly less cost (i.e., \$220,000). The text referenced in the comment is referring to Alternative 5 with onsite treatment. The word "onsite" was inserted between "use" and "treatment" in the second sentence of the referenced cost section (2.10.9). In addition, the text in the second paragraph of the cost subsection in Section 2.7.2 has been modified to clarify the total costs being discussed.
23.	Specific	4.0	161,162				Sections 4.0.4 through 4.0.7. These sections are incorrectly located in Section 3.	As identified, the reference sections 4.0.4 through 4.0.7 have now been properly located with the document.

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
1.	General	2.3.4	19	2nd		Figure 2-4	<p>The Figure indicated that total site risk will be calculated after remediation of non-VOC and/or VOC contamination at each site. However, the text on p. 19 stated:</p> <p>"As shown in Figure 2-4, after all remedial actions have been taken, the BRAC Cleanup Team will evaluate the acceptability of the residual risk at the site. In most cases, the residual risk will be acceptable. The residual risk will be qualitatively [emphasis added] evaluated and may be unacceptable only where many individual chemicals are present so that the residual risk significantly exceeds the goal of 1×10^{-6}. Upon land transfer by FOSET, the residual risk for contaminants in soil for the land parcel will be qualitatively evaluated"</p> <p>Revise the text to be consistent with the Air Force and DTSC agreement that site risk will be adequately characterized, including a quantitative estimate of multi-chemical, multi-pathway risk when more than one medium is contaminated or more than several contaminants remain at the site after remediation. Upon land transfer by FOSET, the residual risk associated with all media, not just soil, should be evaluated. We concur with the inclusion of a qualitative evaluation of contamination at properties adjacent to each site prior to transfer.</p>	<p>The following text is provided as an update. This incorporates comments from both DTSC and EPA (Other - Specific Comment #6):</p> <p>"As shown in Figure 2-4, after all remedial actions have been taken, and total site chemical risk has been determined, the BRAC Cleanup Team will evaluate the residual risk at the site. In most cases, the residual risk will be within the target risk range of (10-6 to 10-4) for Superfund sites as set forth in the NCP, Section 300.430. The residual risk will be quantitatively evaluated and may not be permissible where many individual chemicals are present so that the residual risk significantly exceeds 1×10^{-6}."</p>
2.	General	2.3.3	18	1st			<p>Regarding the remediation non-VOC contamination at two sites, the IP ROD stated, If VOC contaminants are not present, the result will be property available for unrestricted use, thereby minimizing the reliance on institutional controls in perpetuity. Because VOCs have been detected at these sites, amend the text to explain how VOCs will be addressed.</p>	<p>The text has been revised as requested. Please see the responses to US EPA Specific Comments 4, 4A, and 5.</p>

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Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
3.	General	2.4.1.7	32, 65-68, 89,90			Toxicity Criteria, Tables 2-3, 2-4, 2-15, 2-16, 2-20, and 2-21	<p>Discussion</p> <p>Some toxicity criteria have been revised or new values have been proposed by USEPA and Cal/EPA since the IP ROD and supporting risk assessments were conducted, or the more health protective criteria among the sources had not been selected. For some chemicals, route extrapolation was used when an interim, route-specific value should have been used. The criteria affected were cancer slope factors for 1,1-dichloroethene (criteria withdrawn), tetrachloroethene (PCE), and trichloroethene (TCE), and non-cancer toxicity criteria for arsenic (for inhalation use Cal/EPA chronic Reference Exposure Level, REL), acetone, benzene, chloroform, 1,1-dichloroethene, sec-butylbenzene, 1,1,1-trichloroethane, TCE, PCE, and xylenes.</p> <p>Recommendations</p> <p>The hazard associated with inhalation exposure to arsenic should be recalculated using the Cal/EPA REL. However, inhalation is a minor exposure pathway relative to ingestion and dermal exposures to arsenic and the hazard estimates in the IP ROD #1 will not be significantly affected. Therefore, we recommend the revision for sites for which risk assessments are being resubmitted in feasibility study reports and ROD documents. Also, because the scope of the IP ROD #1 is limited to nonVOCs in soil, we do not recommend changes in the calculations for VOCs presented in the IP ROD #1. However, we recommend the uncertainty section for each site include a statement that VOC risk estimates might increase or decrease by more than an order of magnitude when the VOC risk assessments are updated in the VOC FS. USEPA and DTSC risk assessors should be consulted upon revision of the VOC risk assessments presented in future documents</p>	<p>The uncertainty sections for each site were revised to include discussion indicating that VOC risk estimates might increase or decrease by more than an order of magnitude when the VOC risk assessments are updated with the most current toxicity criteria.</p> <p>Because the inhalation route is a minor contributor to the overall hazard estimate for arsenic, the inhalation hazards were not re-calculated. Text was added to the Toxicity Assessment and Uncertainties subsections for PRL S-014 and SA 035 to address potential impacts of using the Cal EPA REL.</p>
4.	Specific					(applies to all the site-specific summaries)	<p>Summary of Chemicals of Potential Concern and Exposure Point Concentrations. Revise and amend the tables for consistency and to clearly present the exposure concentration used in the risk calculations. We recommend that the 95% UCL of the average concentration (for normal or lognormal distribution as appropriate) be presented, if calculated, even if the maximum concentration was the statistic used as the exposure calculation. Some tables had a column for the 95% UCL, but not for the exposure concentration while others had a column for the exposure concentration but no column for the 95% UCL.</p>	<p>Comment has been addressed as requested. Tables have been revised to include the 95% UCL and the exposure point concentration in the same table.</p>

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Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
5.	Specific					(applies to all the site-specific summaries)	Risk Characterization Summary Tables. For the risk and hazard summary for each site, we recommend that the tables be amended with a column showing the exposure concentration for each COPC at each depth interval for all the scenarios.	Comment has been addressed as requested.
6.	Specific	2.4.1.7	34	1st	2nd		Hazard Quotient. The text regarding hazard quotients should be corrected for all sites in which risks were reported. The hazard quotient is the ratio of the receptor average daily exposure to the route-specific reference dose. For example, on Section 2.4.1.7, page 34, first paragraph, the second sentence should be revised as follows: The ratio of the estimated exposure to the RfD toxicity is called a hazard quotient. Similar text on pages 51, 69, 93, 114 also should be revised.	As suggested, the definition of Hazard Quotient has been revised in Appendix A, section 1.4, to read: "The ratio of the receptor average daily exposure to the route-specific reference dose is called a hazard quotient (HQ)."
7.	Specific	2.4.1.2	20				Include VOCs as contaminants detected in shallow soil at the site and describe suspected sources of VOCs.	As suggested, VOCs have been added as a contaminant to the first sentence in the section, and the sentence describing likely sources has been changed as follows: "The motor pool operation is also a potential source of contamination for the VOCs and metals."
8.	Specific	2.4.1.4	22				Revise the second sentence of the first paragraph to clarify that arsenic at the site may pose a risk. The maximum measured concentration, 10 mg/kg, was slightly higher than defined background, 5.8 mg/kg for surface soil and 6.5 mg/kg for subsurface silts and clays.	The second sentence has been revised as follows: "Metals and PCBs were determined to be present at the site, and both arsenic and PCBs may pose a risk to human health and the environment."
9.	Specific	2.4.1.4	22			Metals	It is HERD's understanding that the analytical results for arsenic by Method SW6010 were biased high only for a limited data set in the remedial investigation and should not be applied to all results at all sites. We recommend that all results for arsenic and cadmium for the site be reviewed to determine whether the site has been adequately characterized--by area and for appropriate soil depth intervals (surface soil, 2 ft bgs, and 2 to 10 ft bgs)--if SW6010 data were excluded. Also, report whether the results of the two analytical methods being compared were for co-located samples. Report the method(s) used to analyze background samples. We defer evaluation of the adequacy of the data for site characterization and assessment of risk to the remedial project manager.	Please see the response to DTSC General Comment 5 and Specific Comment 4. The text has been revised to review the data and the adequacy of the site characterization.

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
10.	Specific	2.4.1.4	23			Fig. 2-6	Show locations of the maximum measured concentrations of arsenic and cadmium (both analytical methods).	The following footnote and boring location PS14HA01 have been added to Figure 2-6: The maximum concentrations of arsenic by method SW6010 are 8 mg/kg (0-2 ft bgs) and 10 mg/kg (0-10 ft bgs) located in boring PS14HA01. The maximum concentrations of cadmium by method SW6010 are 3.8 mg/kg (0-2 ft bgs) and 9.7 mg/kg (0-10 ft bgs) located in PS14HA01.
11.	Specific	2.4.1.4	24	2nd		PCBs	Report the status of the transformer in area north of Building 22 and whether the current transformer contains PCBs. Clarify whether the analysis and reported concentrations for PCB-1260 adequately reflected the total concentration of PCBs in each sample.	The following text has been added: "PCB-1260 was the only arochlor mixture detected in the samples using test method SW8082." "The transformer is still in service, but no longer contains the PCB oils, which most likely caused this contamination. Transformers containing PCBs were phased out of service at McClellan in the early 1990s."
12.	Specific	2.4.1.4	24			SVOCs and TPH	Report the detection limits for PAH contaminants that might be expected at this vehicle maintenance facility. Report the maximum detected concentrations and detection limits for TPH-D, TPH-G, benzene, toluene, ethyl benzene, xylenes, and MTBE. The text is unclear as to whether these fuel components were detected in soil samples. If detected, then the data should be included in risk and hazard calculations for comparison with risks estimated from soil gas data. Also, MTBE, if detected in soil samples, should be included as a COPC (Tables 2-2a, 2-2b, 2-2d, and 2-4) and evaluated (Table 2-6).	The following text has been inserted as the third sentence in the section titled "SVOCs and TPH": The SW8270 analysis included analysis of PAHs at reporting limits ranging from 0.019 mg/kg to 0.3 mg/kg. No PAHs were detected. Please see the response to RWQCB Specific Comment #3 for clarification of the other components of this comment.
13.	Specific	2.4.1.4	24,25			SVOCs, TPH,VOC	Because either of the two USTs might have been a waste solvent storage tank, describe the location of soil and soil gas samples relative to the tank locations and analyses that were conducted. Also report whether the tank sites were adequately characterized for solvents.	The subsections have been revised to describe sampling performed adjacent to the former UST locations. Upon review of the data, AFRPA believes that the UST sites have been adequately characterized.
14.	Specific	2.4.1.5	25				Include migration of VOCs to indoor air.	The following sentence has been added: "Potential exposures also include the migration of VOCs to indoor air."
15.	Specific	2.4.1.6	25				Describe the current use of the buildings and of the outdoor areas at PRL S-14.	The following text has been added: "The entire site (buildings and outdoor areas) are unoccupied at this time, awaiting a tenant through a lease arrangement with McClellan Park."

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16.	Specific	2.4.1.7	26	2nd			Revise the text to clarify that the lower of the 95% UCL of the mean concentration and the maximum measured concentration was used for the exposure concentration for COPCs detected in more than one sample.	Note: The risk assessment details, including the associated tables, have been moved to Appendix A. The text has been revised to clarify the basis for the exposure point concentration as follows: "In general, the lower value of the maximum concentration or the 95th UCL concentration was used as the exposure point concentration for COCs detected in more than one sample."
17.	Specific	2.4.1.7	27,28			Tables 2a, 2b	a. We suggest the order of these tables be reversed to clarify the steps used to develop exposure concentrations. The VOCs were measured in soil gas (ppbv). Then, the soil concentration was estimated from a soil equilibrium model and the soil gas concentrations. Emission from soil and resulting air concentration were estimated from models using soil concentration. (Significant uncertainties are associated with these methods and indoor air models currently recommended by USEPA and DTSC utilize shallow soil gas data directly.) b. Table 2-2a. Add a footnote for Soil Concentration to explain that the soil concentrations were modeled from measured shallow soil gas concentrations. Correct the typographical error for the worker outdoor air concentration of cis-1,2-dichloroethene. c. Table 2-2b. Add a column to show corresponding estimated soil concentration	The tables have been revised as requested. The table was revised to include the corresponding estimated soil concentration.
18.	Specific	2.4.1.7	29			Table2-2c	Revise the table to show the exposure concentrations for each chemical and report the maximum concentration as the statistic used.	The table was revised as requested. The table has been revised to include the exposure point concentration for each chemical and update the statistic used.
19.	Specific	2.4.1.7	26,31				In the last sentence of the section on Exposure Assessment, insert the word "known" between "only" and "potential" in regarding the transformer as a source of contamination.	As suggested, the word "known" has been inserted in the sentence in Appendix A, section 1.2: "PRL S-014 North was not sampled for other analytes because the only 'known' potential source or contamination in that area is an electrical transformer."
20.	Specific	2.4.1.7	34	4th	2nd		Revise the sentence to ...duration of receptors exposure to soil...	As suggested, the sentence in Appendix A, section 1.4, has been revised to read: ". . . the frequency and duration of receptors exposure to soil and the toxicity of the COPCs."
21.	Specific	2.4.1.7	34	Last			Delete the last three sentences which repeat information in the previous paragraph.	The text has been revised to eliminate the repetition of this information.

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22.	Specific	2.4.1.7	32			Table 2-4	Include non-cancer toxicity criteria for vanadium (oral reference dose) and methyl tert-butyl ether (MTBE, oral and inhalation reference doses).	The oral reference dose for vanadium was added to the table (now in Appendix A). MTBE was not detected in samples for PRL S-014 so toxicity criteria were not added to the table for MTBE (see response to Specific Comment #12).
23.	Specific	2.4.1.7	37	2nd			Report the risks associated with soil, as well as the combined soil and ground water risk.	Comment has been addressed as requested. Additional information has been added for site PRL S-014 South as per Specific Comment #14 from Kevin Depies/DTSC .
24.	Specific	2.4.1.7	37, 45	2nd,3rd, and 1st bullet			In addition to reporting soil risk and homegrown produce as the main exposure pathway, report the risk associated with soil pathways when ingestion of produce is excluded.	Comment has been addressed as requested. Additional information has been added for site PRL S-014 South and North as per Specific Comment #14 from Kevin Depies/DTSC.
25.	Specific	2.4.1.7	37	1st bullet			In the discussion of uncertainty of land use, include other sensitive-use scenarios for which the residential exposure scenario is applied.	The sentence has been revised in Appendix A, section 1.5, as follows: "Current re-use plans for this site are indefinite, but do not include residential or other "sensitive" use scenarios (day-cares, schools, hospitals, etc.)."
26.	Specific	2.4.1.7	45				In the discussion of uncertainty, include the lack of samples from the former hazardous waste storage area. In addition to the proposed sampling and analysis for PCBs during remedial design phase (p. 24), we recommend analyses for PAHs and metals.	The following sentence has been added: "An uncertainty exists with the soil beneath the former hazardous waste storage area due to the lack of soils samples. This uncertainty may result in an underestimate of risk." Text specifying additional sampling for PAH and metals will be added in Section 2.9.2 (second bullet) to the PCB sampling planned in the remedial design phase.

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27.	Specific	2.4.2.4	45				<p>Discussion</p> <p>Most of this two-acre site is covered by Building 786A, a former chemical and chemical waste storage facility. A removal action was previously conducted on the northwest side of the building to remove PAH-contaminated soil. Low levels of residual PAHs were estimated to pose an acceptable risk, so no further action was proposed for the site. However, further clarification is needed regarding calculation of exposure concentrations. Quantitative risk assessments did not include elevated metals, measured at locations outside the area of excavation for PAHs, or low levels of VOCs measured in a screening investigation of shallow soil gas. The ROD qualitatively addressed chemical-specific risk associated with the metals by comparison with risk-based criteria. We recommend that the multi-chemical risk also be addressed. The VOCs should be evaluated in the appropriate VOC Feasibility Study.</p> <p>Recommendations p. 46, PAHs. Revise the last sentence to identify the cited PRGs as USEPA Region 9 Preliminary Remediation Goals and cite the date of the PRGs</p>	<p>As suggested, the sentence was revised as follows:</p> <p>"However, based on the removal action report, these PAHs were below the 1999 US EPA Region 9 residential Preliminary Remediation Goal (PRG) of 0.062 mg/kg for both benzo(a)pyrene and dibenzo(a,h)anthracene (Weston and Kleinfelder, 2002)."</p>
28.	Specific	2.4.2.4	46-48				<p>Include a description of the location and depth of VOC contamination in the 0 to 15 ft bgs interval.</p>	<p>A subsection on VOCs (provided below) has been added as the last subsection of Section 2.4.2.4.</p> <p>VOCs In 1991, a soil gas investigation was conducted with 9 soil gas samples collected at the site at approximately 3 to 6 ft bgs. Detections of halogenated VOCs were reported at concentrations ranging from 1.5 to 32.5 ppbv.</p>
29.	Specific	2.4.2.4	47			Figure 2-7	<p>We recommend showing the two locations of the highest measured concentrations of metals that exceeded background.</p>	<p>Comment has been addressed by adding the following footnote and two sample locations to Figure 2-7:</p> <p>The two locations at the site of highest measured concentrations of metals detected by method SW6010 that exceeded background were PS33H004 and PS33H008. Arsenic: 17mg/kg (PS33H004) and 18 mg/kg (PS33H008) Chromium: 69mg/kg (PS33H004) and 68 mg/kg (PS33H008) Cobalt: 31mg/kg (PS33H004) and 14 mg/kg (PS33H008) Nickel: 91mg/kg (PS33H004) and 64 mg/kg (PS33H008)</p>

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30.	Specific	2.4.2.4	48				<p>a. Arsenic. Report the range of measured concentrations of arsenic at the site. Because arsenic data were determined to be unreliable (SW6010 analysis), the lack of arsenic represents a potential data gap. However, we noted that the two locations with the highest reported arsenic concentrations, PS33H004 (17 mg/kg) and PS33H008 (18 mg/kg), also had elevated concentrations of other metals (chromium, cobalt, and nickel). Therefore, arsenic might indeed be elevated at these locations.</p> <p>b. Copper. Report the maximum measured concentration of copper in the soil used to backfill the excavation. Report the reference for the term slightly elevated (i.e., background, risk-based concentration, or hazardous waste criterion).</p> <p>c. TPH. Report whether the TPH contamination, including the location of the 310 mg/kg TPH-D, was or was not removed as part of the removal action for PAHs. Revise the text in this section and Section 2.4.2.3, second paragraph, accordingly (e.g., TPH has likely been removed, or TPH contamination remains outside the excavated area).</p>	<p>30a: Please see the response to US EPA Errata Comment 4.</p> <p>30b: The last sentence of the sixth paragraph in Section 2.4.2.4 Metals has been rewritten as follows: The slightly elevated copper concentration was in a sample of soil used during the removal action. The maximum reported concentration (34 mg/kg) was less than the combined background concentration (36.5 mg/kg), and the soil was determined to be acceptable for use as backfill (Weston and Kleinfelder, 2002).</p> <p>30c: Delete the 6th sentence of the 2nd paragraph of Section 2.4.2.3 and rewrite the last sentence in the TPH paragraph in Section 2.4.2.4 as follows: Although the maximum concentration is above the screening level for the protection of surface water and groundwater, the TPH was removed during the PAH removal action. Concentrations of TPH below 100 mg/kg remain in boring locations outside the excavated area.</p>

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31.	Specific	2.4.2.4 2.4.2.7 Table 2-7 2.4.2.7	46 49 50 53			PAHs Risk Characterization	<p>a. Clearly describe the sample data used in the risk assessment. Report whether only confirmation samples within the excavation footprint were used or if data for unexcavated areas west of the building were included. Also, clarify whether data from the imported soil used to fill the excavation were included. The exposure area should be the west side of the building and all the data for that area should be included. However, if the only excavation confirmation samples were used to estimate risks and those concentrations were higher than all other areas, then no recalculation is necessary. However, this should be explained in the text.</p> <p>b. Correct the inconsistencies between the text and table regarding exposure concentrations. Report the maximum residual concentrations of benzo(a)pyrene and dibenz(a,h)anthracene on page 46, as well as the exposure concentration. The table of confirmation samples from the Closure Report (Table 5-2) reported maximum concentrations lower than those reported in Table 2-7 of the ROD. See the comment above regarding the data used in the assessment and clarify what the concentrations reported in the ROD represent.</p> <p>c. Only one set of summary statistics for PAH concentrations was presented (as opposed to three for corresponding soil depth intervals). Report the soil depth interval represented, or clearly distinguish between data for the 0 - 2 ft bgs interval and data for deeper samples. If the data were for confirmation samples from the bottom of the excavation prior to backfilling and represented various depths, then report the range in depth below current grade for the samples used in the risk assessment. A soil depth interval of 0 to 3 feet bgs is a deviation from the 0 to 2 ft bgs interval used for other McClellan baseline risk assessment. However, this is acceptable, providing the data for deeper samples that had no detectable PAHs are excluded from the calculation of exposure concentrations.</p> <p>d. Report the statistical distribution of the PAH concentration data. According to the Closure Report information presented in the Environmental Site Folder, a normal distribution was used to generate more conservative risk calculations. However, it is not apparent that the distribution was evaluated. Data sets with such high percentage of samples with concentrations below detection limits would typically have a lognormal distribution. Clearly report the distribution and corresponding statistics in the table. Also, report that the entire data set was used, substituting one-half the detection limit for concentrations below the detection limit--about 80 to 85% of</p>	<p>31a: Deleted the first paragraph in Appendix A, Section 2, and inserted the following text: The final human health risk assessment for PRL S-033 is based on 39 confirmation samples collected west of the building within the excavation footprint and analyzed for PAHs. Data collected from unexcavated areas at the site and from imported soil used to fill the excavated area were not included in the risk assessment. This section of the ROD summarizes the results of the final risk assessment for PRL S-033.</p> <p>31b: Maximum concentrations noted in Table A2-1 were incorrect. Due to the initial confirmation sample concentrations found, these locations were further excavated, and subsequent confirmation samples were collected. Table A2-1 and the corresponding text have been revised to reflect the concentrations detected as a result of the subsequent, and final, confirmation sampling effort.</p> <p>Deleted and inserted the following data/text in the PAH paragraph: Deleted 0.017 and Inserted 0.020 Deleted 0.025 and Inserted 0.029 Also inserted "maximum residual concentrations of" before "benzo(a)pyrene" in the same sentence.</p> <p>Inserted the following as the last sentence in the PAH paragraph: The exposure point concentrations used to assess the human risk at the site were 0.0023 mg/kg for benzo(a)pyrene and 0.0031mg/kg for dibenzo(a,h)anthracene.</p> <p>31c: The soil depth interval (0-5 ft bgs) was added to Tables A2-1, A2-4, and A2-5. According to the removal action report, confirmation samples were collected between 0-5 ft bgs. The majority of the samples were collected from the 0-2 ft bgs depth interval. The text indicates that validated confirmation sample results were used. However, information is not available in the removal action report to confirm the individual samples used in the risk calculation.</p> <p>31d: Table A2-1 was revised to indicate that the 95UCL is based on a normal distribution. Clarification was added to the text in Appendix A, Section 2 to state that all samples were used in the calculation of the</p>

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							<p>the samples (i.e., rather than using only the measured concentrations).</p> <p>(Second Comment 31)</p> <p>a. Amend the text to clearly state that the risk and hazard estimates were for PAHs only. Metals and VOCs were excluded from the assessment.</p> <p>b. The combined hazard estimate for the four metals exceeding background might exceed one (1). We recommend that the maximum concentrations of the four metals that exceeded background (arsenic, chromium, cobalt, and nickel) be compared with the IP FS risk-based soil screening levels. The sum of the ratios of site concentration to the screening level would provide a conservative estimate for the site.</p> <p>c. Revise the last sentence of the subsection: ...frequency and duration of the receptor exposure to soil...</p>	<p>exposure point concentrations and a proxy value of one-half the detection limit was used for nondetects.</p> <p>(Second Comment 31)</p> <p>31a. The following sentence has been added to Appendix A, section 2.4:</p> <p>"These risk and hazard estimates were for PAHs only. Metals and VOCs were excluded from the assessment, as they were not within the exposure area."</p> <p>31b. The maximum concentrations of the four metals that exceed background (arsenic, chromium, cobalt, and nickel) were be compared to the IP FS risk-based screening levels. This comparison and the sum of these ratios is provided in the uncertainty section as a conservative estimate for an Hazard Index for these metals. The sum of the ratios using the PCGs with the homegrown produce is 3; the sum of the ratios using the PCGs without the homegrown produce is 0.9. Arsenic is the main contributor to the sum.</p> <p>31c. As requested the sentence has been revised in Appendix A, section 2.4, to read:</p> <p>"These risk estimates are based on a reasonable maximum exposure and were developed taking into account various conservative assumptions about the frequency and duration of the receptor exposure to soil and the toxicity of the COCs."</p>
32.	Specific	2.4.2.7	52			Table 2-8,2-9	Identify the source PEF for cancer slope factors in Table 2-8 and add references for non-cancer toxicity criteria in Table 2-9.	The definition for the acronym PEF (potency equivalency factor) was added as a footnote to Table A2-2 with the source reference and date. A footnote was added to Table A2-3 to indicate that the toxicity criteria for pyrene were used as surrogates for the PAHs and a reference was added for the pyrene toxicity criteria.
33.	Specific	2.4.2.7	54			Table 2-10,2-11	Revise the soil depth interval to reflect the actual interval represented.	Soil depth interval was added to Tables A2-4 & A2-5.

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34.	Specific	2.4.2.7	53				Uncertainties: Add bullets reporting that the risks associated with metals in shallow soil and with low levels of VOCs in shallow soil gas have not been calculated (see Comment 31b regarding calculating a hazard estimate for metals).	Bullets were added to Appendix A, Section 2.5 to indicate that risks associated with metals in shallow soil and low levels of VOCs in shallow soil gas were not calculated for PRL S-33. The bullet regarding metals includes a comparison of maximum detected concentrations of four metals (arsenic, chromium, cobalt, and nickel) to IP FS risk-based soil screening levels (see response to second Comment #31b).
35.	Specific	2.4.3.1	55	1st			<p>Discussion</p> <p>The eight-acre site was the location of a former aircraft maintenance and engine test area. The operating base commissary is located in the center of the southern half of the site. The northern two-acre section of this site has extensive fuel-related contamination in the upper ten feet. Low concentrations of phthalates were detected in multiple samples throughout the area. The PAHs detected at the site include naphthalene, 2-methylnaphthalene, fluorene, phenanthrene, and benz(a)anthracene. Naphthalene is a primary contributor to non-cancer risk at the site but was excluded from the indoor air pathway in the risk assessment presented in the IP ROD. No further action for CERCLA was proposed; a removal action was proposed under State requirements for fuel contamination.</p> <p>Atypical contaminants at the site include 2,6-dinitrotoluene and N-nitrosodiphenylamine. No discussion was presented in the IP ROD or supporting documents regarding the potential source of these contaminants. The reported operation of an engine test stand might have included testing of fuels other than typical aircraft fuels (e.g., JATO--Jet Assisted Take-Off--a rocket propellant that might be the source of 2,6-dinitrotoluene). Elevated levels of potassium and sodium at the site might also be related to engine testing and maintenance. For the proposed removal action, we recommend confirmation sampling include SVOC and PAH analyses. Also, because aircraft maintenance and engine testing were activities during which surface releases might have occurred, confirmation sampling should include surface soil at locations beyond the excavation.</p> <p>Recommendations Section 2.4.3.1, p. 55, first paragraph. Describe the current use of former Base housing 100 ft north of the site. Specifically, state whether residents are present.</p>	<p>Immediately north of the site are former dormitories, which are used occasionally by McClellan Park tenants to house employees attending training at McClellan Park. The former base housing units are located north and northwest of the site, with the dormitories providing a buffer area between the site and the current residents. The following text has been added in Appendix B describing the status of the dormitory housing:</p> <p>"An area due north of the site (approximately 100 feet away) provides dormitory housing for employees of McClellan Park tenants who require temporary housing while attending training sessions on base."</p>

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36.	Specific	2.4.3.2	55			Figure 2-9, and Table 2-13	Soil samples were analyzed for TPH-D and TPH-G and, reportedly, for VOCs. However, no results for soil analysis were reported for BTEX. For the high levels of TPH detected, concentrations of BTEX might be expected to be higher than those reported in Table 2-13. Clarify whether BTEX analyses were conducted. In a footnote to Table 2-13, report the source of the soil concentrations for the VOCs listed.	BTEX analyses for soil samples were not conducted. The VOC concentrations in Table B1-1b are modeled concentrations based on the soil gas concentration of the constituents listed. A footnote has been added to Table B1-1b indicating the source of the soil concentrations. The following statement was added: "Exposure point concentrations for these VOCs in soil are modeled from measured shallow soil gas concentrations."
37.	Specific	2.4.3.4	58				SVOCs and Metals. Clarify that screening levels were chemical-specific; some of the listed chemicals contributed significantly to soil risk (e.g., benz[a]anthracene).	To satisfy this comment as well as a related EPA comment, the sentence describing the eight other SVOCs now in Appendix B, section 1.5.3.1, reads: "Eight other SVOCs were detected at the maximum concentration indicated below, but at concentrations less than the chemical specific screening levels for the protection of human health, surface water, and groundwater."
38.	Specific	2.4.3.7	60				Identification of Chemicals of Concern. Revise the first sentence; four metals, not three, were evaluated as site contaminants exceeding background. Also, revise the text to reflect the use of the maximum concentration as the exposure concentration for some of the soil contaminants (the lower of the 95% UCL of the mean concentration and the maximum concentration was used).	The word "three" was changed to "four". The text has been revised to clarify the basis for the exposure point concentration as follows: "In general, the lower value of the maximum concentration or the 95th UCL concentration was used as the exposure point concentration for COCs detected in more than one sample."
39.	Specific	2.4.3.7				Table 2-12 and 2-14	Revise and amend the tables for consistency. In addition to the maximum measured concentration, report the 95% UCL of the mean, the distribution of the data for which the 95% UCL was calculated, and the statistic--maximum or 95% UCL--selected for the exposure concentration. For ground water, data for only two samples were available, so maximum concentrations were used as exposure concentrations. Revise the statistical measure column contents to reflect this. Also, in Table 2-14, correct the typographical errors for chemical names.	Tables B1-1c & B1-1d were revised to include the correct 95% UCL concentration and the exposure point concentration (maximum or 95% UCL). The statistical measure column was revised to reflect the appropriate information.

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40.	Specific	2.3.3.7	64			Exposure Assessment	<p>a. Describe the exposure area, limited to two acres of the northern portion of the site.</p> <p>b. Inhalation of VOCs in indoor air should have been included in the risk assessment. Clarify this in the text.</p>	<p>a. As suggested, the following sentence describing exposure area has been added to Appendix B, section 1.7.2:</p> <p>"The exposure area is limited to two acres of the northern portion of the site."</p> <p>b. Text was added to indicate inhalation of VOCs in indoor air was evaluated for residents and inhalation of VOCs in ambient air was evaluated for outdoor workers and construction workers.</p>
41.	Specific	2.4.3.7	70			Risk Characterization	<p>Report the risks associated with soil contaminants only. Report benz(a)anthracene was the primary contributor to soil risk. See the comment below regarding naphthalene, a major contributor to non-cancer risk at the site.</p>	<p>The text has been revised as requested. Additional information has been added per the response to Specific Comment #14 from Kevin Depies/DTSC for site PRL S-040.</p>
42.	Specific	2.4.3.7	61,62				<p>Volatile organic compounds detected in soil were excluded from Table 2-12 for soil exposure concentrations and shown in Table 2-13 for air exposure concentrations. We suggest a footnote be added clarifying whether direct exposure pathways for VOCs soil (ingestion and dermal, as well as inhalation) were evaluated in the risk assessment.</p>	<p>A sentence was added to the footnote on Table B1-1a that states: Modeled VOC concentrations in soil were used to evaluate the ingestion, dermal contact, and inhalation exposure pathways.</p>
43.	Specific	2.4.3.7	62			Table 2-13	<p>a. Add cyclohexane as a volatile COPC (13,000 ppbv in soil gas from boring PS40SB025 at 9.7 ft bgs).</p> <p>b. Include naphthalene and 2-methylaphthalene for evaluation of potential indoor air risks. The maximum measured concentration of naphthalene was 5.6 mg/kg and the 95% UCL of the mean was 6.7 mg/kg, indicating a potentially significant non-cancer risk. [For the Initial Parcel FS, the risk-based soil concentration for naphthalene was 1.9 mg/kg, for direct contact and indoor air pathways. For the indoor air pathway alone, HERD estimated risk-based soil concentrations of 1.6 and 1.3 mg/kg, using McClellan-specific soil properties and applying the USEPA screening and advanced modes, respectively, of the Johnson and Ettinger soil vapor intrusion indoor air model.]</p>	<p>43a. Hazard quotients for cyclohexane were calculated. Because the calculated values were low and did not change the hazard indices, the hazard quotients are provided in the uncertainty section rather than in the tables.</p> <p>43b. Potential indoor air risks associated with naphthalene and 2-methylnaphthalene were addressed in the uncertainties section. Estimated hazard quotients are provided that include the indoor air risks.</p>
44.	Specific	2.4.3.7	67			Table 2-16	<p>Include references for the source of each toxicity value and report the surrogate chemicals used. Include toxicity criteria for n-propylbenzene (see USEPA Region 9 PRG Table for NCEA values).</p>	<p>References and the toxicity criteria for n-propylbenzene were added to Table B1-3.</p>

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45.	Specific	2.4.3.7	72			Table 2-18	<p>Non-cancer risks. Calculate hazard quotients for zinc and cyclohexane and other soil contaminants, including VOCs in the 0 to 2 and 0 to 10 ft bgs intervals. If all the VOCs were not detected in the 0 to 15 ft bgs interval, then they should be excluded as chemicals of concern in soil or enter a notation in each row (e.g., ground water contaminant only). Review the calculations and correct apparent discrepancies for total soil and total soil + ground water risks for the two soil depth intervals. [We compared risk and hazard calculations with those presented in the OUs E-H RICS risk assessment for the residential scenario. Although exposure concentrations were consistent, we noted minor differences among pathway-specific hazard estimates. Some differences might have been the result of rounding versus truncating numerical estimates--the IP ROD values were generally lower. However, these likely will not have a significant impact on estimates of total hazard.]</p>	<p>Zinc has been added to the non-cancer risk calculations. See the response to Specific Comment 43 for cyclohexane.</p> <p>The calculations were reviewed and no errors were found in the total soil and total soil + groundwater risks. Any minor discrepancies are the result of rounding.</p>
46.	Specific	2.4.3.7	75				<p>Basis for No Action. Revise the text to include the non-cancer risk associated with naphthalene and other VOCs in indoor air (expected to exceed a hazard index of one). Also, revise the second sentence regarding no further action for CERCLA contamination. Some contaminants are not typical of TPH fuel (nitrosamines, 2,6-dinitrotoluene) and others are associated with by-products of fuel combustion.</p>	<p>Discussion of the risk associated with naphthalene and 2-methylnaphthalene has been added to the Uncertainties subsection.</p> <p>The Basis for No Action subsection has been revised as follows: The risk estimates for PRL S-040 are within or below EPA's risk management range except for the indoor air pathway. Hazard Quotients associated with exposure to two fuel-related contaminants, naphthalene, and 2-methyl naphthalene, were 3 and 6, respectively, when the indoor air pathway was included. Fuels-related contamination at PRL S-040 will be addressed under State requirements. Therefore, no further action is warranted under CERCLA.</p>

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47.	Specific	2.4.4.4	76 and 79			SA 3	<p>Discussion</p> <p>Site SA 3 is approximately 0.5 acres in area and located immediately south of Magpie Creek. A vehicle washrack, part of the industrial waste line, and a hazardous waste storage area were operated at the site. Lead and TPH were identified as the primary contaminants. Hexavalent chromium was measured in concentrations as high as 8 mg/kg. However, the extent of metals contamination has not been defined. The IP ROD #1 also reported that PCBs, PAHs, and pesticides have not been adequately characterized. A risk assessment was previously conducted for Investigative Cluster 3, which included the area of SA 3. However, HERD concurs with the IP ROD #1 finding that the risk assessment was incomplete because of inadequate characterization of SA 3. Further action is proposed for the site and the preferred remedy is further characterization and excavation of contaminated soil. The VOC contamination at the site reportedly will be addressed in the VOC FS Addendum.</p> <p>Recommendations</p> <p>TPH: Describe the screening levels for TPH to which the text of several paragraphs refers (e.g., for protection of ground water and protection of surface water, but not for risks associated with exposures to soil contaminants). Currently, DTSC does not have guidance for use of generic human health risk-based screening levels for TPH. On page 79, revise the text to clarify that the TPH constituents were TPH analyzed as diesel and as gasoline. If VOCs and PAHs were analyzed as TPH constituents, then report the results of those analyses.</p>	<p>The text was revised to clarify the TPH screening levels as either for the protection of surface water or groundwater. The text was also revised to clarify "TPH constituents" as TPH-D and TPH-G. VOCs and PAHs were not analyzed as TPH constituents.</p> <p>Deleted and inserted the following text in Section 2.4.3.4, TPH, first paragraph, last sentence: Deleted the word "any", and inserted the following at the end of the last sentence "for the protection of surface water and groundwater."</p> <p>Inserted the following text in Section 2.4.3.4, TPH, second paragraph, last sentence: "for the protection of surface water and groundwater."</p> <p>Deleted and inserted the following text in Section 2.4.3.4, TPH, fourth paragraph, first sentence: Deleted "TPH constituents" and inserted "TPH-D and TPH-G"</p>

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48.	Specific	2.4.4.4	80				VOCs: Report whether soil gas samples were collected in the 0 to 10 ft bgs soil interval. The presence of high levels of VOCs in samples deeper than 10 indicates that VOCs may be expected to be present in the shallower interval.	<p>During the RI, there were no soil gas samples collected from the 0 – 10 ft bgs soil interval. During the recent POL/SSG sampling effort, 16 soil gas samples from 5 boring locations at depths ranging from 5 – 15 feet were collected. Text was added to the VOC section indicating whether soil gas samples were collected in the 0 – 10 ft bgs soil interval.</p> <p>Insert the following text in Section 2.4.3.4, VOCs, after first sentence: No soil gas samples were collected from the 0 – 10 ft bgs soil interval.</p> <p>Insert the following text in Section 2.4.3.4, VOCs, after second sentence: In the 5 – 15 ft bgs soil interval, 16 soil gas samples from 5 boring locations were collected.</p>
49.	Specific	2.4.4.5	80				Include VOC migration to indoor air as potentially significant exposure pathway under some future land use scenarios.	<p>As suggested, the following sentence has been added: "VOC migration to indoor air is a potentially significant exposure pathway under some future land use scenarios."</p>
50.	Specific	2.4.4.6	80				Describe the current use of the site.	<p>As suggested, the current site use has been added as follows: "The site is vacant at this time, awaiting potential use by some future tenant through a lease arrangement with McClellan Park."</p>
51.	Specific	2.4.4.7	80,81				<p>Lead:</p> <p>a. The DTSC LeadSpread model is a lead exposure model, not a biokinetic model as stated. Revise the text accordingly.</p> <p>b. Report the blood lead levels associated with lead concentrations in the 0 to 2 ft bgs interval. With lead concentrations as high as 564 mg/kg in surface soil, blood lead levels for a child receptor might exceed 10 ug/dl.</p> <p>c. Delete the phrase "for adverse affects" from the last sentence.</p>	<p>a. As clarified, the lead spread model has been changed to a "lead exposure" model instead of a "biokinetic" model.</p> <p>b. The text has been revised to include the blood lead level of 17 ug/dL (99th percentile) for the child residential scenario (0 - 2 ft bgs).</p> <p>Inserted the following text at the end of the paragraph in Section 2.4.3.7: The estimated blood-lead level at the 99th percentile for the child residential receptor is 17 ug/dL for lead concentrations in soil at 0 to 2 ft bgs. The estimated blood-lead level is above the target level of 10 ug/dL.</p> <p>c. As suggested, the phrase, "for adverse affects", has been deleted.</p>

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52.	Specific	2.4.5.1	81	first		SA 35	<p>Discussion</p> <p>Site SA 35 consists of Building 20 and a paved parking lot on the western half of the site. According to the IP FS, the exposure area is approximately 20,000 sq. ft. or about one-half acre, including about 12,000 sq. ft. covered by Building 20. The exposure area for SA 35 was extended beyond the site boundary to include a small area of contamination by bis(2-chloroethyl)ether and arsenic at the northwest corner of the building and step-out sample locations north and northwest of the building. The exposure area was also extended east and south of the building to include three sample locations. Though arsenic and bis(2-chloroethyl)ether were estimated to pose a significant risk, no action is proposed because of the limited extent of contamination. The VOC contamination will be addressed in the VOC FS Addendum. According to the OU A RICS Addendum risk assessment, only acetone was detected in one of three shallow soil gas borings.</p> <p>Recommendations</p> <p>Report the size of the site and the size of Building 20.</p>	<p>As suggested the size of the site and building 20 have been added to the text, now section 2.4.4.1:</p> <p>"SA 035 is located in IC 25 in northern OU A and includes Building 20 and the surrounding parking lot. The site covers approximately 20,000 sq. ft., or about one-half acre, including about 12,000 sq. ft. covered by Building 20."</p>
53.	Specific	2.4.5.3	81-82				<p>State in this section that no samples were collected beneath the building.</p>	<p>As suggested the following revision to the text has been added:</p> <p>"Soil gas and groundwater samples were collected around the exterior of Building 20 and analyzed for VOCs during the Phase 2 RI and Data Gap investigation conducted from 1996 to 1999. No samples were collected from beneath the building."</p>

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54.	Specific	2.4.5.4	82				<p>Metals: The occurrence of elevated concentrations of arsenic and lead (as well as copper and zinc) and cadmium among two sample locations is indicative of contamination. Also, the maximum concentration of arsenic, 12.4 mg/kg, was measured at the same location as SVOC contamination.</p> <p>However, according to the OU A RICS Addendum, analytical problems with method SW7060 included high spike recoveries so the reported concentration, 12.4 mg/kg, might be high. Cadmium was excluded as a contaminant although concentrations might have been underestimated as a result of low spike recoveries. (Also, background for cadmium has not been established because background sample concentrations were below detection limits.) Describe the nature of the all the screening levels (e.g., human health risk, ground and surface water protection). In addition to referencing various background concentration and screening criteria to support the conclusion that the contamination is not significant, describe the distance between the sample locations and the estimated area of impacted soil.</p>	<p>Text describing the results of additional sampling and analyses performed by the Air Force in December 2003 has been added as the third paragraphs of the metals and SVOC subsections.</p> <p>In regard to cadmium and lead detected in samples from SA35SB003, the location of the borings are shown on Figure 2-10. A reference to the figure has been added as the second sentence of the paragraph. ("Boring SA35SB003 is located west of Building 20 and approximately 100 feet south of the nearest boring, SA35SB001, as shown on Figure 2-10.") In addition, the phrase "for protection of human health, groundwater and surface water" has been added after "screening levels" in the last sentence of the second paragraph of the metals subsection.</p>
55.	Specific	2.4.5.4	82				<p>SVOCs. Describe the distance from the location of detected bis(2-chloroethyl)ether to Building 20. Bis(2-chloroethyl)ether is fairly volatile and the OU A RICS Addendum showed it posed a potential indoor air risk if the 95% UCL of mean concentration were underlying a hypothetical residential structure.</p>	<p>The following sentence has been added as the 2nd sentence of the 1st paragraph of Section 2.4.4.4, SVOCs: The location of boring SA35SB001 is shown on Figure 2-10 and is within 10 feet of Building 20. (Also see the response to Specific Comment 54.)</p>
56.	Specific	2.4.5.4	84				<p>Report the range of measured concentrations of VOCs in the three shallow soil gas borings and identify the VOCs present in the highest concentration.</p>	<p>The only measured concentration of VOCs in the three shallow soil gas samples collected at SA 035 was from boring SA35PR001 as noted in the text. The VOC detected was acetone at 750 ppbv at 6.3 ft bgs. There were no other detections of VOCs in this boring or the other two borings. Therefore, there is no range of measured VOCs to report.</p> <p>The second sentence of the VOCs subsection has been rewritten as follows: Only one detection of a VOC was reported, acetone at 750 ppbv from SA35PR001.</p>
57.	Specific	2.4.5.4	83			Figure 2-12	<p>Show the location of the three shallow soil gas samples, or, at a minimum, the location of SA35PR001 in which VOCs were detected.</p>	<p>The location of SA35PR001 has been added to Figure 2-10.</p>
58.	Specific	2.4.5.6	84				<p>Report the current use of the site.</p>	<p>The following text has been added:</p> <p>"The site is occupied at this time by a lease tenant (Surewest Communications)."</p>

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59.	Specific	2.4.5.7	86			Table 2-19a	Revise the footnote to indicate that the soil concentration for acetone was estimated from soil gas concentrations. The bis(2-chloroethyl)ether soil concentrations were from soil data. The concentrations presented in the table were consistent with those reported in the OU A RICS Addendum. Include the concentrations for acetone from modeling for the occupational scenarios.	<p>A footnote was added to the table (now in Appendix A) stating "The exposure point concentration for this VOC in soil was estimated from a measured soil gas concentration." In the table, acetone concentrations have been included in the occupational scenarios. However, the flux rate for acetone for the occupational scenarios was not available in the RICS document.</p> <p>Inserted the following values for acetone for the occupational scenario in the table: Indoor air: 9×10^{-6} Outdoor air: 3.1×10^{-7}</p>
60.	Specific	2.4.5.7	88			Table 2-19d	Exposure Concentrations, and Section 2.4.5.7, p. 85, Identification of Chemicals of Concern. Report that data from all investigations were used to revise exposure concentrations for benzoic acid, bis(2-chloroethyl)ether, and bis(2-ethylhexyl)phthalate from those in previous assessments. Review and revise the 95% UCL for bis(2-chloroethyl)ether in the 0-2 ft bgs interval and explain why the maximum concentration was used.	<p>The following sentence has been added as the last sentence of the paragraph: SVOC data from the RI and 2002 data gaps investigation were combined to revise the exposure point concentrations shown on Table A3-1d as compared to those presented in the OU A RICS Addendum.</p> <p>For the 0-2 ft bgs interval, the maximum (and sole) detection of bis2cee was 0.462 mg/kg. The 95% UCL for the lognormal distribution was 0.74 mg/kg. Therefore, the maximum detected concentration was used as the exposure point concentration. The 95% UCL has been added to Table A3-1d.</p>
61.	Specific	2.4.5.7	95			Table 2-22	Using exposure concentrations from Table 2-19a, we could not confirm the inhalation risks reported for bis(2-chloroethyl)ether for the residential scenarios or the outdoor occupational scenario. Review and correct the calculations as appropriate. Also, the risk for the indoor occupational receptor should be reported as an inhalation risk, not ingestion (the value appears correct).	The inhalation risk value for the indoor occupational receptor was moved to the correct column on the table (now in Appendix A). The bis2cee calculations have been reviewed and are correct. Bis2cee was evaluated as a non-VOC for the risk assessment presented in the IP FS #1 and the ROD.
62.	Specific	2.4.5.7	98			Table 2-23	Using the exposure concentrations from Tables 2-19a and 2-19d, we could not confirm hazard quotients for inhalation exposures to bis(2-chloroethyl)ether for all scenarios except the indoor occupational scenario. This is apparently due to the evaluation of bis(2-chloroethyl)ether as a particulate rather than a volatile compound. However, the difference would not significantly impact total hazard estimates for the site. Similarly, we could not confirm inhalation or dermal hazard quotients for benzoic acid or most hazard quotients for bis(2-ethylhexyl)phthalate, but these do not significantly impact the hazard index.	Bis(2-chloroethyl)ether was evaluated as a non-VOC in the IP FS #1 and the ROD. No changes were made to the table.

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63.	Specific	2.4.5.7	94				In addition to total site risk, report cancer and non-cancer risks associated with soil contaminants only.	<p>The cancer and noncancer risks for SA 035 for soil only have been added to the text as follows:</p> <p>Future adult resident (0-2 feet bgs depth interval): 2×10^{-3} Future adult resident (0-10 feet bgs depth interval): 5×10^{-4}</p> <p>The potential noncancer risks are as follows:</p> <p>Future adult resident (0-2 feet bgs depth interval): <1 Future adult resident (0-10 feet bgs depth interval): <1</p> <p>Future child resident (0-2 feet bgs depth interval): 2 Future child resident (0-10 feet bgs depth interval): 1</p>
64.	Specific	2.4.5.7	103			First bullet	To support the discussion, report the risk associated with bis(2-chloroethyl)ether in soil when the produce pathway is excluded.	<p>Additional information regarding the reduction in risk when bis(2-chloroethyl)ether in the homegrown produce pathway is excluded was included in the third bullet in the "Uncertainty" section. The text was revised to include the following text at the end of the second bullet.</p> <p>If the homegrown produce pathway associated with bis(2-chloroethyl)ether is excluded, the adult carcinogenic risk associated with this chemical of concerned would be as follows:</p> <p>Future adult resident (0-2 feet bgs depth interval): 2.4×10^{-6} Future adult resident (0-10 feet bgs depth interval): 6.9×10^{-7}</p>
65.	Specific	2.4.5.7	103				Basis for No Action. We recommend that the very limited area of contamination by bis(2-chloroethyl)ether be emphasized to support the proposal for no action at the site.	<p>The following text has been added to reflect the additional sampling performed at this site:</p> <p>"Potential future exposure of residents or workers to near surface contaminated soil has been addressed at this site through limited soil removal as part of additional site characterization sampling. Results are now non-detect for the organic bis2CEE, and the arsenic levels are at background. As a result, at this site no threats remain, and therefore no action is necessary at this site."</p>

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66.	Specific	2.4.6.6	104			SA 41	<p>Discussion</p> <p>According to information in the Environmental Site File, the DTSC approved this site for no further investigation in 1996. No soil samples were collected at the site because no suspected sources or disposal points/areas were identified and the site is reportedly completely covered by Building 54 and pavement.</p> <p>According to the Visual Site Inspection Form (see Section 3 of the Environmental Site File), there is a two-foot wide section of exposed soil along the east side of building. This is inconsistent with the description of the site as being entirely covered. Because of the age of the building, lead-based paint was cited as a potential issue but no lead survey or sampling had been performed at the time of the inspection (April 2000). Prior to transfer for unrestricted use, it would be prudent to sample the exposed soil for lead. [Note: Normal weathering and chalking of paint can contribute to elevated lead in soil even if the paint is not peeling or flaking.] The Visual Site Inspection Form also reported that the transformer outside the south wall of the facility was not observed to be leaking and no staining was observed on the transformer pad; therefore, PCBs were not suspected contaminants at the site.</p> <p>Screening shallow soil gas samples were collected around the perimeter of Building 54 and VOCs were reported in six of eight samples. However, only one sample was analyzed off-site for confirmation by Method TO-14, and the detection of aromatic VOCs in samples analyzed on-site were judged to be false positives. Halogenated VOCs were positively identified in the one definitive sample: 78 ppbv carbon tetrachloride, 18 ppbv 1,1,1-TCA, 2.6 ppbv TCE, 20 ppbv Freon 11, 28 ppbv Freon 12, and 6.6 ppbv Freon 113. According to information in the Environmental Site File, these soil gas concentrations were compared with preliminary cleanup goals developed in the October 1999 VOC FS for VOCs in soil gas and indoor air exposures. The Environmental Site File identified a potential information gap for the shallow soil gas indoor air exposure pathway, and recommended that the site be considered in Phase 2 or 3 Shallow Soil Gaps field sampling plans. Based on concentrations reported for the one shallow soil gas sample from the south end of the site and the current USEPA soil gas screening model, the cumulative indoor air risk is not expected to exceed 10⁻⁴ (USEPA version of the Johnson and Ettinger soil vapor intrusion model, screening mode with DTSC toxicity criteria and default assumptions or McClellan-specific soil properties). However, the USEPA Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Ground Water and Soils lists risk-based, generic shallow soil gas screening levels of less than 1 ppbv for carbon</p>	<p>As suggested the current use of the site has been added as follows:</p> <p>"The site is currently vacant, awaiting reuse by a future tenant through a lease arrangement with McClellan Park."</p>

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67.	Specific	2.4.6.7	106				<p>tetrachloride and benzene. (Benzene is representative of aromatic VOCs but detections were deemed false positives in screening soil gas samples.) The VOC FS for the site should evaluate site VOC data and report multi-chemical risk.</p> <p>Recommendations</p> <p>Report the current use of site SA 41.</p> <p>Basis for No Action:</p> <p>a. Revise the text to clarify that no soil samples were collected and that VOCs were detected at low levels in shallow soil gas.</p> <p>b. The text on page 104 stated that no risk assessment was conducted. However, the text on page 106 indicated that a screening level risk assessment was conducted. Describe on page 104 the screening process and human health risk criteria that were used in the assessment, and identify the document in which the screening risk assessment was reported.</p> <p>c. Report whether the site is under influence of any soil vapor extraction system.</p>	<p>a. The following sentence has been added to the Basis for No Action:</p> <p>"Soil gas screening found only low levels of VOCs and therefore no soil samples were collected."</p> <p>b. Text has been revised and added in Section 2.4.5.7 to describe the screening process and human health risk criteria used to determine why SA 041 did not require a risk assessment. The first paragraph has been revised as follows:</p> <p>According to the OU A RICS, site investigations revealed that activities within the building involved minimal use of hazardous materials. In addition, potential contaminant pathways were not identified because the building had concrete floors with no drains, and there was no visual evidence of contamination noted. There was also no exposed soil present around the building. Therefore, soil sampling was not deemed necessary for the site. However, shallow screening soil gas samples were collected around the perimeter of the building. Confirmed analytes were not reported at concentrations greater than 500 ppbv. Since shallow soil gas samples did not exceed 500 ppbv and soil sampling was determined to not be necessary, contaminants of potential concern were not selected during the screening level human health risk assessment (FSP, 1995). Therefore, a human health risk assessment was not performed for the site.</p> <p>c. Text has been added to section 2.4.5.1 to state:</p> <p>"The site is not under the influence of any soil vapor extraction system."</p>

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68.	Specific	2.4.7.1	106			SA 91	<p>Discussion</p> <p>This site is about 10 acres in size with the foundation of a former warehouse covering more than half the site. The site includes a 4.5-acre open storage area east of former Building 621. The storage area was used for PCB transformer storage and truck parking. Soil samples collected in an area in the center of the open storage area were analyzed for TPH-diesel, PCBs and pesticides. According to information in the Environmental Site File, the DTSC approved this site for no further investigation in 1996. Subsequently, shallow soil samples were collected to further define the extent of low level pesticide (DDT, DDE) contamination. Only pesticides were evaluated in the risk assessment presented in the IP FS. We could not locate data for the one sample (location HA01; OU A RICS Appendix C) reportedly analyzed for metals and SVOCs.</p> <p>A shallow (<10 feet bgs) screening soil gas survey around the perimeter of the building showed low levels of acetone, 1,1,1-TCA and PCE. Definitive analysis of four of the soil gas samples by Method TO-14 did not confirm 1,1,1-TCA or PCE. However, low levels of acetone and Freon 113, and fuel-related VOCs--toluene, 1,2,4- and 1,3,5-trimethylbenzene, and xylenes--were measured and attributed to off-site sources. According to the data quality objectives cited in the Environmental Site File, because VOCs were less than 500 ppbv in shallow soil gas, no further soil sampling was warranted.</p> <p>Recommendations</p> <p>Report the size of the site and the relative area covered by the foundation of Building 621. Clarify whether the entire area of the site, beyond the building foundation, has been covered by pavement and for what period.</p>	<p>As suggested, the following text has been added describing the size of the site and the pavement extent and history:</p> <p>"The site is approximately 10 acres in size. The former warehouse covered more than half of the site. The site also includes a 4.5 acre (paved) open storage area east of the building."</p> <p>"The entire area of the site, surrounding the building has been covered by pavement since at least 1953."</p>

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69.	Specific	2.4.7.1	106				As described in the text, soil sampling was determined to be unwarranted because of the detection of only low levels of VOCs in shallow soil gas. However, contaminants such as metals and PAHs would not be detected in soil gas sampling and analysis. Provide the rationale why the open storage and truck parking areas east of the building were not sampled for metals and PAHs.	<p>Metals and PAHs were not identified as COPCs at the site (OU A Preliminary Site Assessment, 1991). Although limited sampling for metals and PAHs was proposed in the OU A Sampling and Analysis Plan (May 1992), the sampling was not performed. Sampling in the open storage area was tailored to uses identified during interviews (i.e., PCB transformer storage and transformer oil handling) as described in the second paragraph of Section 2.4.6.1.</p> <p>The following sentence has been added as the fifth sentence of the first paragraph in Section 2.4.6.3: In the open storage area, sampling and analysis were tailored to uses identified during interviews and as described in Section 2.4.6.1.</p> <p>The following text was added as the last bullet of Appendix A, Section 4.5: Only limited samples from the site were analyzed for SVOCs and metals. This may result in underestimating site risks.</p>
70.	Specific	2.4.7.4	109				VOCs: Revise the text to clarify whether all soil gas data were less than 100 ppbv (only acetone reportedly detected) or 500 ppbv (no individual constituent). Report the time period between the RI shallow soil gas sampling, during which PCE and 1,1,1-TCA were detected, and confirmation sampling (or were the samples from the same sampling episode and were subjected to confirmation by definitive analysis).	<p>The text was revised to clarify that results from the soil gas samples were all below 100 ppbv.</p> <p>Inserted the following sentence after the first sentence in the first paragraph in the VOC section (2.4.6.4): Analytical results from the soil gas samples indicated that all constituents detected were less than 100 ppbv.</p> <p>Changed "sampling" at the end of the third sentence to "analysis performed at the same time".</p>
71.	Specific	2.4.7.6	109				Report the current use of the site.	<p>The following text has been added:</p> <p>"The site is vacant at this time, the former foundation of Bldg 621 has been demolished and the site is awaiting redevelopment by some future tenant through a lease arrangement with McClellan Park."</p>
72.	Specific	2.4.7.7	110			Table 2-24	Select one format for reporting concentrations and statistically derived concentrations, and revise the table using one format consistently. We also recommend presenting a maximum of two significant figures.	All tables, including Table A4-1, have been revised to present concentrations in a consistent format with only two significant figures.

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73.	Specific	2.4.7.7	110			Table 2-24	Exposure Concentrations: Although the scope of our review did not include verifying all statistical analyses and estimation of exposure concentrations, we could not determine how the data for DDE and DDT in the 0 to 10 ft bgs interval could be normally distributed, particularly considering the relatively low detection frequencies (9/83 and 15/83, respectively) and large number of values substituted by one-half the method detection limit. We recommend that the exposure concentrations be reviewed and revised as appropriate. [The reported 95% UCL of the arithmetic mean (normal distribution) and the maximum concentration for DDE were 0.0064 mg/kg and 0.47 mg/kg, respectively. The 95% UCL and maximum concentrations for DDT were 0.012 and 0.34, respectively. See also Comment 4.]	The exposure concentration calculations were reviewed and no errors were found. The data sets did not follow a normal or lognormal distribution; the normal distribution was used as a default assumption based on the large size of the data set (83 samples).
74.	Specific	2.4.7.7	111				Exposure Assessment: Revise the last sentence of the section to state that ground water beneath the site was not evaluated, rather than could not be evaluated, as stated. If there were no ground water data for the vicinity of the site, then report this. As agreed for OU A baseline risk assessments, ground water risks were evaluated for each site if data were available for the site or adjacent areas, regardless of the source of the contamination.	The last two sentences of the last paragraph of the Exposure Assessment subsection have been deleted. The groundwater risks have been evaluated and added to the draft final ROD.
75.	Specific	2.4.7.7	112,113			Table 2-25,2-26	Define NA (not available?) in a footnote to each table.	NA has been deleted from Tables A4-2 and A4-3.
76.	Specific	2.4.7.7	116,117			Table 2-27,2-28	We were not able to verify the risk and hazard estimates for DDE in the 0 to 10 ft bgs interval. Apparently, the average concentration was reported instead of the 95% UCL of the mean (as per the IP FS Appendix G). Review and revise the EPC in Table 2-24 and calculations for all scenarios as appropriate.	The 95UCL concentration for DDE in the 0-10 ft depth interval was corrected to 0.016 mg/kg in Table A4-1. The risk calculations were done correctly for the Draft IP ROD #1 with the 95UCL concentration as the exposure point concentration.
77.	Other						Figures and Tables. Please enlarge Figures and Tables and fonts to readable scale. We found the print to be too small to be readable (e.g., Figures 2-4 2-9).	All figures and tables have been reviewed and reformatted as necessary to improve readability.
78.	Other	1.3	2			Second bullet	For remedial actions at sites PRL S-14 and SA 3, the text reported that field screening and/or laboratory analysis may be used to guide excavation and resolve data gaps. Field testing methods might not produce data of adequate quality for risk assessment purposes. We strongly recommend that data gaps and confirmation sampling be of adequate quality for quantitative assessment of site risk.	The words "and resolve data gaps" have been deleted from the bullet and an additional bullet has been added: " EPA certified lab analysis will be used for data gap resolution, confirmation sampling, and waste characterization purposes."

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No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
79.	Other	1.4	4	1st			For sites PRL S-14 and SA 3, the text stated that a five-year review will not be required if the proposed remedial actions are implemented. However, if remedial action is not implemented or the objectives are not achieved in five years, then, as stated in the text, a policy review may be conducted to ensure that the remedy is protective of human health and the environment. Explain in the text how this determination of protectiveness will be made and whether a quantitative risk assessment will be conducted to support the determination.	The text has been revised to read: "However, if the remedial action has not been implemented, the next 5 Year Review would include a review of these sites. Specifically, the Technical Assessment for each site would ascertain what actions are still required and whether the remedy is protective of human health and the environment. In the event the remedial action cannot achieve the ROD RAOs, an amendment to the ROD or a ROD Explanation of Significant Differences (ESD) would be performed to resolve the discrepancy."
80.	Other	2.0	6	First			Based on site descriptions in the IP ROD #1 and other supporting documents, HERD estimated the total area of the seven sites to be about 22 acres, not 92 acres. Review site information and revise the last sentence as appropriate.	The text has been corrected to read "22" acres, instead of 92.

Response to Comments: Draft IP ROD #1 (7 Sites)

Comment By: HERD – Barbara Renzi, M.S.

No.	Comment Type	Section	Page	Paragraph	Sentence	Other	Comment	Response
81.	Other	2.0	6	Third			<p>Describe current land uses at each of the seven sites, and specifically state whether any of the areas adjacent to the sites are used for residential or other sensitive uses. Alternatively, add these descriptions to the site-specific bullets in Section 2.1.1.</p>	<p>As suggested, the current land use at each of the six CERCLA sites (and whether any of areas adjacent to the sites are used for residential or other "sensitive uses") has been added to the specific bullets in Section 2.1.1:</p> <p>PRL S-014 - The site is unoccupied at this time, awaiting some future tenant through a lease arrangement with McClellan Park. None of the areas adjacent to this site are used for residential or other "sensitive" uses (such as day-care facilities, schools, hospitals, etc.)</p> <p>SA 003 - The site is vacant at this time, awaiting potential use by some future tenant through a lease arrangement with McClellan Park. None of the areas adjacent to this site are used for residential or other "sensitive" uses.</p> <p>SA 035 - The site is occupied at this time by a lease tenant (Surewest Communications). None of the areas adjacent to this site are used for residential or other "sensitive" uses.</p> <p>PRL S-033 - The site is occupied at this time by a lease tenant (Buettler Heating and Air Conditioning). None of the areas adjacent to this site are used for residential or other "sensitive" uses.</p> <p>SA 041 - The site is unoccupied at this time, awaiting some future tenant through a lease arrangement with McClellan Park. None of the areas adjacent to this site are used for residential or other "sensitive" uses.</p> <p>SA 091 - The site is vacant at this time, awaiting redevelopment by some future tenant through a lease arrangement with McClellan Park. None of the areas adjacent to this site are used for residential or other "sensitive" uses.</p> <p>For PRL S-040 the text is found in Appendix B, section 1.2.1:</p> <p>"The site currently serves as a portion of the parking lot for customers of the base exchange and commissary. An area due north of the site (approximately 100' away) provides dormitory housing for employees of McClellan Park tenants who require temporary housing while attending training sessions on base. No parcels</p>

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82.	Other	2.4	21			Figure 2-5	Revise the pathway exposure pathway analysis for ecological receptors to show that none of the potentially complete pathways listed in the matrix was evaluated in this FS [sic] (i.e., ROD) for the seven sites addressed.	adjacent to this site are used for residential or other "sensitive" uses (day-cares, schools, hospitals, etc.)." The requested change has been made. No significant ecological habitat was found during the initial ecological screening of sites conducted during the RI process, therefore these pathways are not complete.