



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 9  
75 Hawthorne Street  
San Francisco, California**

July 7, 2010

**Sent via Electronic Mail Only**

Ms. Kathryn Stewart  
BRAC Environmental Coordinator, Former Naval Air Station Moffett Field  
Department of the Navy  
Base Realignment and Closure Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310  
[Kathryn.Stewart@navy.mil](mailto:Kathryn.Stewart@navy.mil)

Subject: EPA Non-Concurrence on the Navy's *Final Five-Year Review Report Installation Restoration Sites 1, 22, 26, and 28, Former Naval Air Station Moffett Field, Moffett Field, California*, dated February 12, 2010

Dear Ms. Stewart:

The U.S. Environmental Protection Agency (EPA) has reviewed the Navy's Five-Year Review Report for the Site 1 Landfill, Site 22 Golf Course Landfill, Site 26 East-side Aquifer Treatment System (EATS) Area, and the Site 28 West-side Aquifers Treatment System (WATS) Area (Final Five-Year Review Report), dated February 12, 2010. As reflected in EPA's December 14, 2009 comment letter on the Navy's Draft Five-Year Review report, EPA does not concur with the Navy's protectiveness statement for the Site 28 WATS Area.

As stated in EPA's 2001 Five-Year Review guidance, when EPA does not concur with the Navy's protectiveness determination, EPA will present its independent findings. As such and as stated in EPA's December 14, 2009 comment letter and based on EPA's September 30, 2009 Final Second Five-Year Review for the Middlefield-Ellis-Whisman Superfund Study Area (MEW Site), which includes the Site 28, WATS Area, below is EPA's protectiveness determination.

The remedy at the Site 28, WATS Area, is not protective because it does not adequately address potential health risks from long-term exposure to trichloroethene (TCE) and tetrachloroethene (PCE) through the vapor intrusion pathway. Remedial actions are necessary to ensure the protection of human health. EPA issued a Proposed Plan for the MEW Site vapor intrusion remedy in July 2009 and accepted public comments through November 2009. The remedy for the vapor intrusion pathway will be incorporated into the overall MEW site remedy through an amendment to the 1989 Record of Decision for the MEW Site.

The following actions need to be taken to ensure the protectiveness of the remedy:

- Finalize the amendment to the Record of Decision (ROD Amendment) for the vapor intrusion pathway.
- Complete baseline sampling and evaluation of buildings within the Vapor Intrusion Study Area.
- Implement remedial actions and institutional controls on existing and future buildings within the Vapor Intrusion Study Area, as needed, in accordance with the ROD Amendment and design documents.

EPA anticipates issuing a ROD Amendment in Summer 2010 and estimates that implementation of the vapor intrusion remedy will be completed by Spring 2012. The groundwater is not being used as a potable water supply, and there are no direct exposure pathways to the contaminated groundwater while groundwater cleanup continues. EPA and the Navy will evaluate the need for institutional controls to continue to ensure there are no direct exposure pathways to contaminated groundwater.

The following actions must be taken to fully capture the regional groundwater plume at the downgradient boundaries and limit vertical migration of contaminants to the B1/A2 and B2 Aquifers:

- Enhance groundwater contaminant plume capture and groundwater cleanup efforts by implementing facility-specific and Regional Groundwater Remediation Program optimization plans.
- Evaluate and perform pilot treatability studies of alternative groundwater cleanup technologies to expedite contaminant mass removal and cleanup time and reduce volatile organic compound (VOC) concentrations throughout the groundwater VOC plume.

EPA's Five-year Review guidance states that the remedy should be considered not protective when potential or actual exposure is clearly present or there is evidence of exposure. As described in the 2009 Supplemental Remedial Investigation and Supplemental Feasibility Study for the Vapor Intrusion Pathway, EPA's Proposed Plan and EPA's Second Five-Year Review for the MEW Site, there are buildings on Moffett Field within EPA's Vapor Intrusion Study Area that have not yet been sampled or assessed. Until all the buildings within the Vapor Intrusion Study Area have been adequately addressed, EPA cannot agree with the Navy's conclusion that the current vapor intrusion exposure pathway is incomplete and that there is no current exposure to Site contaminants exceeding EPA's indoor air cleanup levels for long-term exposure.

Ms. Kathryn Stewart  
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Importantly, it is EPA's position that the Navy is one of the responsible parties for addressing the vapor intrusion pathway. Although NASA is the current landowner of Moffett Field, because the Navy is jointly responsible for the groundwater contamination, the Navy is responsible for addressing the potential contaminant exposure pathways from the groundwater, including the subsurface vapor intrusion to indoor air pathway.

EPA appreciates the Navy's continued efforts to work closely with EPA to ensure that the remedies at Moffett Field are protective of human health and the environment now and in the future. Please contact my staff Alana Lee at 415.972.3141 ([Lee.Alana@epa.gov](mailto:Lee.Alana@epa.gov)) to arrange a meeting to further discuss any questions you may have.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Montgomery", with the word "for" written in smaller cursive below it.

Michael Montgomery  
Assistant Director, Federal Facilities and Site Cleanup Branch  
Superfund Division

cc (via-e-mail only):

Elizabeth Wells, Water Board, [ewells@waterboards.ca.gov](mailto:ewells@waterboards.ca.gov)  
Dr. Ann Clarke, NASA Ames Research Center, [ann.clarke@nasa.gov](mailto:ann.clarke@nasa.gov)  
Donald Chuck, NASA Ames Research Center, [donald.m.chuck@nasa.gov](mailto:donald.m.chuck@nasa.gov)  
George Cook, Santa Clara Valley Water District, [gcook@valleywater.org](mailto:gcook@valleywater.org)  
Stewart McGee, City of Sunnyvale, [smcgee@ci.sunnyvale.ca.us](mailto:smcgee@ci.sunnyvale.ca.us)  
Kevin Woodhouse, City of Mountain View, [kevin.woodhouse@mountainview.gov](mailto:kevin.woodhouse@mountainview.gov)  
Jim Blamey, Santa Clara County DEH, [jim.blamey@deh.sccgov.org](mailto:jim.blamey@deh.sccgov.org)  
William Berry, NAS Moffett Field RAB Co-Chair, [wberry@ucsc.edu](mailto:wberry@ucsc.edu)  
Lenny Siegel, Center for Public Environmental Oversight, [lennysiegel@cpeo.org](mailto:lennysiegel@cpeo.org)  
Peter Strauss, NAS Moffett Field TAG Advisor, [petestrauss1@comcast.net](mailto:petestrauss1@comcast.net)  
Nancy Bice, Geosyntec Consultants, [nbice@geosyntec.com](mailto:nbice@geosyntec.com)