



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

18 SEP 1987

Captain C.T. Moyer, III
Department of the Navy
Naval Air Station
Moffett Field, CA 94035-5000

Subject: EPA Oversight of Remedial Activities at Naval Air
Station Moffett Field

Dear Captain Moyer:

This letter is in response to a request made by Richard Lee Kuersteiner, J. Martin Robertson, and Jim Coda of the Office of General Counsel, Department of the Navy, at a meeting held with EPA on September 10, 1987. At the meeting, the Navy representatives stated the Department of the Navy wants to enter into an Interagency Agreement (IAG) with EPA; the IAG would address remedial activities at Naval Air Station Moffett Field (Moffett) and will provide for full participation by the State. The Navy representatives stated they would like to begin negotiations in the near future and they are interested in addressing the remedial investigation and feasibility study (RI/FS) tasks as well as the remedial actions in the IAG. The Navy representatives also requested we convey to you the role EPA expects to play in oversight of the remedial activities at Moffett.

The Superfund Amendments and Reauthorization Act of 1986 (SARA) requires EPA and the Navy to review and select a remedial action(s) at Moffett Field. EPA is given the final authority under SARA to select the remedial action(s) if agreement with the Navy cannot be reached. It is currently EPA policy to enter into an IAG with federal facilities on the National Priorities List which addresses both RI/FS work and remedial actions to be conducted at the facility. It is also EPA policy to incorporate state agency requirements into the IAG and to include the state as a signatory to the IAG if the state is interested.

At the present time, the San Francisco Bay Regional Water Quality Control Board (RWQCB) has been designated the lead agency under the South Bay Groundwater Contamination Enforcement Agreement between EPA and the RWQCB. We have initiated discussions with the RWQCB to assume the lead role for Moffett and expect to reach a decision within the next month. Even if EPA assumes the lead role, the RWQCB will remain involved to ensure State requirements are met.

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I hope this letter addresses your questions regarding EPA's role at Moffett Field. If you have any further questions, please feel free to call Amy Zimpfer at (415) 974-7414 or Lewis Mitani of my staff at (415) 974-7836.

Sincerely,



Keith A. Takata, Chief
Superfund Programs Branch

cc: Roger James RWQCB
David McFadden, EPA ORC