



DEPARTMENT OF THE NAVY

NAVAL AIR STATION
MOFFETT FIELD, CA 94035-5000

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MOFFETT FIELD
SSIC NO. 5090.3

IN REPLY REFER TO
5090
Ser 00/3429
29 OCT 1987

California Regional Water Quality Control Board
San Francisco Bay Region
Attn: Roger James
Executive Officer
1111 Jackson Street, Room 6040
Oakland, CA 94607

Dear Mr. James:

I am writing to update you on what we have done, and what we intend to do to ensure that all cleanup actions at Moffett Field take place as quickly as possible.

In response to the concerns you raised earlier this year, we have thoroughly reassessed our capability to respond to environmental problems at Moffett Field and have charted a course for responding to these problems which will use every means available to us. We have summarized how we plan to respond to your concerns through our environmental programs in the enclosed document.

To carry out our plan, we are forming a management team both here at Moffett and at WESTDIV which is dedicated to addressing environmental issues. Formation of our team is well underway. We have already greatly expanded our contractor support by bringing a larger firm of consultants onboard. Design contracts have been awarded for various projects within our authority. We have taken steps to enter into an interagency agreement for the entire response. As I told the Board in the hearing last month, we are mobilizing to clean up Moffett. While I cannot commit the Congress of the United States to provide the resources on any given schedule, I can promise that we will request and budget the funding at the earliest possible dates in order to meet a mutually agreeable cleanup schedule.

In summary, I want to reiterate our commitment to work with the Regional Water Quality Control Board, the Environmental Protection Agency and other interested parties to effect the cleanup of Moffett Field.

Sincerely,

C.T. MOYER III
Captain, U.S. Navy
Commanding Officer

Encl:

(1) Environmental Programs at Naval Air Station, Moffett Field

164
NAVY/RWQCB 35
John

ENVIRONMENTAL PROGRAMS AT NAVAL AIR STATION, MOFFETT FIELD

The Commanding Officer of Naval Air Station (NAS) Moffett Field is responsible for overall management of environmental programs which must comply with all environmental laws and regulations applicable to his installation. Western Division, Naval Facilities Engineering Command (WESTDIV) provides technical and contractual support and assistance to help NAS Moffett Field fulfill its environmental responsibilities. WESTDIV's support includes technical consultation, procurement of engineering services, and management of Navy environmental programs which are centrally funded to ensure uniform compliance with applicable federal law.

As a Department of Defense facility, NAS Moffett field must carry out a program of environmental restoration subject to, and in a manner consistent with the Comprehensive Environmental Response, Compensation and Liability Act, as amended (CERCLA), and the National Oil and Hazardous Substances Contingency Plan (NCP). In addition, since NAS Moffett Field has been designated on the National Priorities List, the air station must enter into an interagency agreement with the Environmental Protection Agency (EPA) within 180 days of the selection of a remedial action. Negotiation with EPA to develop an interagency agreement early in the response process began in October 1987.

In order to comply with CERCLA and attain applicable or relevant and appropriate Federal and State requirements, NAS Moffett Field has a number of ongoing environmental programs as shown on Attachment A. Each of these programs is currently being implemented through contracts with professional engineering consultants under the provisions of stringent Federal Acquisition Regulations designed to preserve fairness and accountability in the expenditure of public funds. The planned funding sources for each contracting action are depicted on Attachment B.

Past hazardous waste disposal sites on NAS Moffett Field, identified through the Navy Assessment and Control of Installation Pollutants (NACIP) Program (Sites 1-9) and a Navy Industrial Waste Engineering Study (Sites 10-17) are being investigated and remediated through the Installation Restoration (IR) Program. Independently funded from the Defense Environmental Restoration Account (DERA), the Department of Defense equivalent to the Environmental Protection Agency (EPA) Superfund Program, the IR Program follows the procedures outlined in the National Contingency Plan (NCP). The phased process includes a Preliminary Assessment/Site Inspection (PA/SI) to identify potential contaminated sites on the air station. Those sites verified to be contaminated in these phases are then subjected to a Remedial Investigation/Feasibility Study (RI/FS) to characterize the extent of contamination and identify feasible remediation alternatives. Following the completion of the RI/FS a remedial action plan is then selected and a Record of Decision published for public review. The final phase, Remedial Design/Remedial Action (RD/RA), implements the selected remediation alternative for the site.

The IR Program at NAS Moffett Field is in the RI/FS stage. Preliminary planning documents, including a Sampling Plan and Quality Assurance Project Plan prepared by Kennedy/Jenks/Chilton (K/J/C), a consultant to WESTDIV, have been prepared for sites 1-10. A new consultant, International Technologies (IT), retained through contracts with the Department of Energy, will prepare a sampling plan for sites 11-17. After regulatory agency review, the planning documents will be finalized and field investigation implemented by IT. The change in contractual mechanism was instituted in order to expedite the process in response to RWQCB concerns. The IR process will address a number of RWQCB concerns about proposals (workplans) to characterize the extent of contamination, field investigations in accordance with the workplans, reports of investigation results (including Solid Waste Assessment Test (SWAT) reports for landfills), identification of any required interim remedial actions including alternatives, design of interim remedial actions, execution (by separate contract) of interim remedial actions, and a final RI/FS report for NAS Moffett Field.

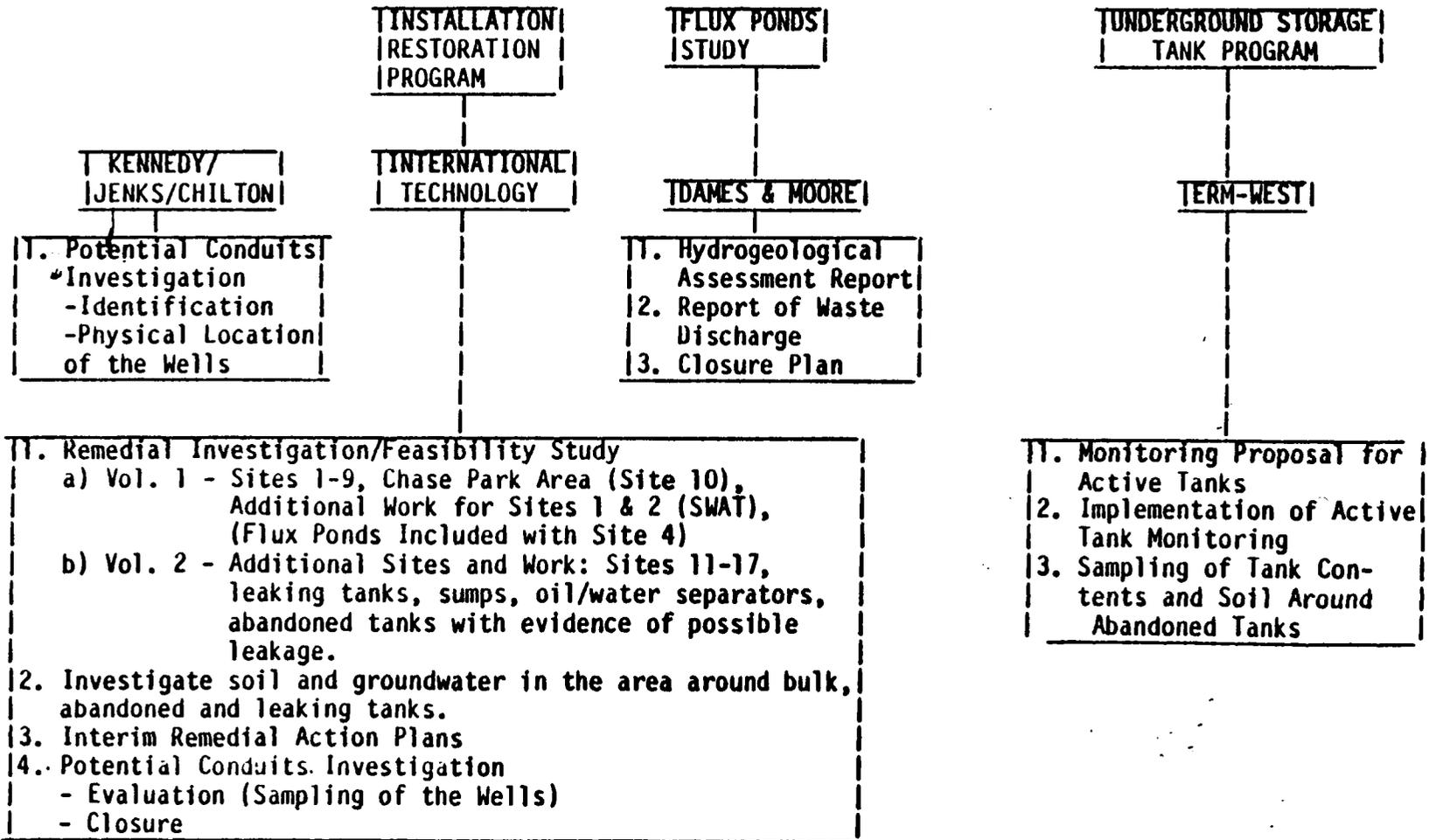
Concurrent with the IR Program, NAS Moffett Field has initiated an investigation to identify, locate, evaluate and close abandoned wells that may serve as potential conduits for subsurface contamination. K/J/C is currently identifying and locating the wells and will prepare a report of their investigations. IT will then evaluate the condition of the wells, perform chemical analyses of the water, and prepare closure plans as appropriate. The potential conduit investigations will be incorporated into the IR Program and will provide specific reports to meet RWQCB requirements.

A separate program to comply with state laws regarding Underground Storage Tanks (UST) is being implemented at NAS Moffett Field through a WESTDIV contract. ERM-West, the UST Program consultant, will study active and abandoned tanks. Monitoring wells will be installed around active tanks, and contents of the tanks and the soil around abandoned tanks will be tested by ERM-West. Additionally, under the IR Program, IT will characterize the soil and groundwater around any abandoned and bulk tanks, sumps, or oil/water separators. Four leaking tanks (2, 14, 43, and 53) will be removed by a separate construction contractor. After removal of the tanks the areas will be included in the IR Program to adequately characterize and remediate contaminated soil and groundwater.

NAS Moffett Field is addressing the RWQCB concerns regarding surface impoundments by preparing a Hydrogeologic Assessment Report, a Report of Waste Discharge, and a Closure Plan for the flux ponds under a contract with Dames & Moore. Determination of whether or not liquid hazardous waste will be removed from the surface impoundments is dependent upon the results of the flux ponds study.

The environmental programs being implemented at NAS Moffett Field will enable the air station to meet its responsibilities under applicable federal, state and local laws. Use of different consultants and funding sources for each of these programs is a product of federal policy and procedure, but will help expedite the overall investigative process. Management of the programs by the Commanding Officer, NAS Moffett Field, with technical assistance from WESTDIV, will ensure that decisions regarding remedial actions will be the result of thorough and complete remedial investigations coordinated with appropriate regulatory agencies every step of the way.

ENVIRONMENTAL PROGRAMS AT NAVAL AIR STATION, MOFFETT FIELD



NAS MOFFETT FIELD
ENVIRONMENTAL PROGRAMS
CONTRACT/FUNDING PLAN

Funding sources:

o Defense Environmental Restoration Account (DERA): Annual appropriation; limited to CERCLA/SARA applications; budgeted by Naval Facilities Engineering Command (NAVFAC); managed by WESTDIV.

o Pollution Abatement (PA): Annual appropriation; limited to RCRA/UST application; budgeted by NAVFAC; managed by WESTDIV.

o Operations and Maintenance Navy (O&MN): Annual appropriation; used for base operations and maintenance; budgeted through operational chain of command; expenditures for construction/alterations less than \$25K and repairs less than \$75K managed by CO, NAS Moffett Field; expenditures for construction/alterations \$25K-\$200K and repairs over \$75K managed by CINCPACFLT.

o Military Construction (MILCON): Annual appropriation; used for new construction/alterations over \$200K; budgeted for specific projects by the Congress; managed by WESTDIV for project execution.

Funding Plan:

o Potential Conduits Investigation:

- Contractors: Kennedy/Jenks/Chilton (K/J/C)
International Technology (IT)
- Tasks awarded:
Identify/locate wells - K/J/C (FY87 DERA)
- Tasks planned:
Evaluation/closure plans for wells - IT (FY87 DERA)

o Installation Restoration Program:

- Contractors: Kennedy/Jenks/Chilton (K/J/C)
International Technology (IT)
- Tasks awarded:
RI/FS draft workplans - K/J/C (FY87 DERA)
RI/FS final workplans - IT (FY87 DERA)
- Tasks planned:
RI/FS field work/reports - IT (FY87/88 DERA)
Interim remedial action plans - IT (FY88 DERA)
Interim remedial action - Competition (FY89 DERA)
Record of Decision - IT (FY89/90 DERA)

o Flux Ponds Study:

- Contractor: Dames & Moore
- Tasks awarded: Hydrogeologic Assessment Report
- (FY87 O&MN)
Report of Waste Discharge - (FY87 O&MN)
Closure Plan - (FY87 O&MN)
- Tasks planned: Liquid HW removal - (FY88 O&MN)

o Underground Storage Tank Program:

- Contractor: ERM-West
- Tasks awarded: Active tank monitoring plan - (FY87 PA)
Abandoned tank sampling/monitoring
- (FY87 IR)
- Tasks planned: Active tank monitoring - (FY88 PA)