

LOCKHEED MARTIN

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MOFFETT FIELD
SSIC NO. 5090.3.A.

September 22, 2003
20030146

Mr. Scott Gromko
Remedial Project Manager
Southwest Division
Naval Facilities Engineering Command
BRAC Operations Office
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8517

SUBJECT: Northern Channel

REFERENCE: Department of the Navy letter, dated August 7, 2003

Former NAS Moffett Field, California, "Northern Channel Feasibility Study, Final Draft," dated May 15, 2003

Former NAS Moffett Field, California, "Northern Channel Feasibility Study, Draft," dated December 16, 2002

Dear Mr. Gromko:

Lockheed Martin has reviewed the above referenced final draft feasibility study (FS), including comments to the document from the various stakeholders. In addition, from the above referenced Navy letter, it is our understanding that the Navy desires to continue sampling along the southern berm of the Northern Channel and the Lockheed Channel. Please find below comments to the FS and the request to sample on Lockheed Martin property.

Comments to Feasibility Study

#1. Remedial Action Objectives (RAO) – Several of the RAO concentrations (chlordane, cadmium, selenium, and silver added) were reduced from the December 16, 2002 draft document. Please provide the rationale for this reduction. Further, are greater volumes of generated remediation material anticipated resulting from the more stringent cleanup standards?

#2. Figure 3-16 – This figure has labeled a "suspected Lockheed outfall location" between Transect 9 and 10. Please provide the basis for this suspicion. A survey

by Lockheed Martin personnel did not observe any indications of past or current discharge activity or piping in this area.

#3. Page 72 "However, samples were not collected ... because the Navy was not allowed access to Lockheed property;..."

Lockheed Martin requested technical justification for the proposed Navy sampling prior to granting access. Instead, it was the decision of the Navy, due to schedule constraints, not to sample and therefore exclude Lockheed Martin's property (as well as the property owned by the City of Sunnyvale) from the attainment area considered in the FS. We request that the language in the final Feasibility Study be changed to reflect the accuracy of that decision not to sample on Lockheed Martin's or the City's property.

Comments to Sampling Request

The above referenced Navy letter dated August 7, 2003 requests access to sample areas as previously outlined in the Northern Channel Data Gaps Investigation Field Work Plan of September 21, 2002. Lockheed Martin will address the request to sample along the southern berm of the Northern Channel only, please refer to the City of Sunnyvale for the Lockheed Channel as the city owns and controls access to that area. We note that, the City informs us that to date, it has not received any similar request from the Navy seeking access to perform additional sampling on the City's property.

It is Lockheed Martin's position that sampling now along the southern berm of the Northern Channel is neither warranted nor provides value to the existing data compilation for the following reasons:

- The ecological risk assessment and remedial alternative determination have been completed.
- Sufficient sample data from the northern berm exists to establish a trend to characterize the southern berm. Sample data from the northern berm show concentrations to be significantly below the industrial soil PRGs and many below U. S. background soils. In fact, the sample data show that most all concentrations to be below the far more stringent residential soil PRGs.
- It is not likely that the southern berm was historically maintained in a different manner than the northern berm due to their function and local proximity to each other.

Aside from the above comments and questions, Lockheed Martin concurs with the methodology and conclusions of the FS and the proposed remedy selection for impacted soils. Lockheed Martin remains supportive of the Navy in the remediation of areas affected by Moffett's historical operations. Further, due to

the proximity of Lockheed Martin operations to the planned remediation, we would appreciate the opportunity to review and comment to the proposed traffic plan.

Should you have any questions, please contact me at (408) 756-0538.

Sincerely,

LOCKHEED MARTIN SPACE SYSTEMS COMPANY

A handwritten signature in black ink that reads "Allen J. Lund". The signature is written in a cursive style with a large, looping initial "A".

Allen J. Lund
Environment, Safety & Health

CC: Andrea Espinoza, BRAC Environmental Coordinator
Ron Duncan, LMSSC ESH Manager
Whit Thornton, LMSSC Division Counsel
Mike Chan, City Property Administrator

Bcc:

Jon Benjamin, Esq., Farella, Braun & Martell

Donna Scott, Acting Assistant City Attorney