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Subj: INSTALLATION RESTORATION PROGRAM FOR NAVAL AIR STATION,
MOFFETT FIELD - MONTHLY AGENCY MEETING MINUTES

Encl: (1) Monthly Agency Meeting Minutes - October 1992

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NAVAL AIR STATION MOFFETT FIELD

AGENCY MEETING MINUTES

OCTOBER 21, 1992

This memorandum summarizes the items that were discussed in the monthly regulatory agency meeting for the Naval Air Station (NAS) Moffett Field Remedial Investigation/Feasibility Study (RI/FS) project. The following people attended the meeting:

Roberta Blank	US EPA	Don Chuck	NAS Moffett Field
Kelly McCarty	US EPA	Su Don Tu	NAS Moffett Field
Elizabeth Adams	RWQCB	Josh Marvil	PRC EMI
Cyrus Shabahari	Cal-EPA	Lynn Valdivia	PRC EMI
Fred Molloy	SAIC	Joe LeClaire	JMM
Stephen Chao	US Navy	Michael Howar	JMM
Camille Garibaldi	US Navy	Keith Bradley	IT Corp.
Lt. Susanne Openshaw	NAS Moffett Field		

The following items were discussed during the meeting:

- MEW Remedial Design Status
- NAS Moffett Field Operable Unit (OU) Reports
- Source Controls Status
- Miscellaneous Items
- Future Meetings

MEW Remedial Design Status

- According to Kelly McCarty (EPA), the MEW 35 percent design for the regional plume is due on March 3, 1993.
- Kelly McCarty indicated that the MEW group may be receptive to the Navy contributing to the design work in the Site 9 area.

- The Navy indicated that the Site 9 design is conceptual, and that it would require extensive work to complete the 35 percent design in cooperation with the MEW group by March 3, 1993.
- Issues regarding Federal Acquisition Regulations (FAR) and how the Navy could contribute to the design work need to be discussed at a later date.
- A tentative design and construction schedule for cleanup of the regional plume is as follows:

<u>Date</u>	<u>Action</u>
March 3, 1993	Submittal of 35 Percent Design
April 3, 1993	Approval of 35 Percent Design
July 3, 1993	Submittal of Final Design
August 3, 1993	Approval of Final Design
October 3, 1993	Submittal of Construction and Operation and Maintenance Plan (COMP)
November 3, 1993	Approval of COMP
January 3, 1994	Begin Construction

OU Reports

OU 5

- The regulatory agency representatives agreed with the Navy's suggestion that OU 5 (east-side aquifers) be amended to include all areas not included in the regional plume.

OU 4

- Keith Bradley (IT Corp.) attempted to clarify the status of OU 4 (west-side aquifers) for the Navy. Since OU 4 no longer exists, the Remedial Investigation (RI) report for OU 4 will be renamed the Phases 1 and 2 Characterization Report for the West-side Aquifers and will not contain a baseline risk assessment. The Feasibility Study (FS) for OU 4 will be renamed as a design document.

OU 2

- Keith Bradley (IT Corp.) recommended keeping the majority of the OU 2 RI report intact. For sites overlying the regional plume, the contaminants in the MEW Record of Decision (ROD) will be covered by the MEW ROD. For contaminants that are not included in the MEW ROD and for sites that do not overlie the regional plume, an FS will be prepared.
- Roberta Blank (EPA) objected to this suggestion. She stated that a risk assessment for the regional plume has been prepared and approved under the MEW ROD. The EPA wants to avoid encountering contradictory conclusions that may result from two different risk assessments.
- The question of how the MEW ROD will cover TPH contamination at OU 2 sites that overlie the regional plume was brought up by Elizabeth Adams (RWQCB). Roberta Blank replied that the remedies in the MEW ROD may incidentally address the TPH contamination. If this is not the case, the EPA will use other mechanisms (i.e. RCRA corrective action) to address remediation of the TPH contamination.
- Elizabeth Adams (RWQCB) expressed concern that the risks due to all contaminants at OU 2 sites need to be addressed and documented for public knowledge, and that by covering all OU 2 sites under the MEW ROD, all of the data collected over several years at NAS Moffett Field would not be used.
- Roberta Blank and Kelly McCarty (EPA) stated that OU 2 sites overlying the regional plume must be covered by the MEW ROD to avoid amending the MEW ROD. In order to amend the MEW ROD, the ROD must be reopened and undergo public comment, which will delay the remediation. The EPA wants OU 2 to contain only the sites that do not overlie the regional plume.
- Josh Marvil (PRC) expressed concern that the conclusions reached in the MEW RI/FS and ROD are based on limited data on NAS Moffett Field. The remedies selected in the MEW ROD are probably not the best remedies for NAS Moffett

Field based on the investigations conducted by the Navy over the past several years.

- Roberta Blank stated that this decision-making process needs to be part of the public record and that the Navy should address their concerns in writing.
- Roberta Blank requested a revised schedule of how the Navy plans to proceed with work relating to OU 2.
- Roberta Blank also stated that the Navy will be bound to the soil cleanup levels indicated in the MEW ROD for sites overlying the regional plume. Also, source controls at NAS Moffett Field will become long-term remedial actions.
- Roberta Blank indicated that alternate technologies may be included in the design of the regional cleanup. These technologies would be based on performance criteria for emissions. Roberta also stated that EPA counsel and RWQCB would review the thermal oxidation and reinjection technologies to determine if they are acceptable within the context of the MEW ROD.
- Roberta Blank will be sending a letter to the Navy regarding OU 2 and the old OU 4. She will arrange a meeting to include EPA branch chiefs to discuss some of the following issues:
 1. The OU 4 RI report will be submitted as a characterization report for the west-side aquifers and the OU 4 FS will be submitted as a source control design document.
 2. The characterization report will be a primary document and will be subject to dispute resolution.
 3. The source controls at Site 9 will become long-term remedial actions.

4. The OU 2 sites that overlie the regional plume will be removed from the OU 2 RI report and placed in the characterization report for the west-side aquifers.
5. The FFA schedule will be renegotiated to reflect the above changes.
6. The Navy will review the MEW ROD and identify any sites where the remedial actions mandated in the ROD are not applicable due to contaminants being present which are not listed as COCs in the MEW ROD, primarily benzene, toluene, ethylbenzene, and xylenes.

Source Controls Status

- Construction at Site 14 was completed. The Navy will be making a minor adjustment to piping entering the granular activated carbon (GAC) unit.
- The Site 12 concrete pad is under construction. A bioremediation contractor should be selected by the time the pad is completed.

Miscellaneous Items

- The Navy is preparing a response to the MEW comments regarding potential sources at several Buildings at NAS Moffett Field provided during the July MEW meeting.
- The draft horizontal conduit study work plan will be submitted to the regulatory agencies in mid-December.
- A request for proposal to remove the Building 29 tanks will be sent out next week. The tank removals should begin in January.
- The Navy will include an investigation of the fuel pits in Hangar 1 in a new CTO to be issued to PRC in November.

- The OU 6 work plan will be submitted on November 3.

Future Meetings

- October 27, 9:30 a.m. MEW Meeting
- November 16, 10:00 a.m. Monthly Agency Meeting at DTSC (Berkeley)
- December 15, 10:00 Monthly Agency Meeting at RWQCB (Oakland)