

**Newton, Darren CIV OASN (IE) BRAC PMO West**

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**From:** Gromko, Scott CTR OASN (I&E) BRAC PMO West  
**Sent:** Thursday, September 27, 2007 4:31 PM  
**To:** Newton, Darren CIV OASN (I&E) BRAC PMO West  
**Subject:** FW: EPA draft Big Picture Comments for Hangar 1 EE/CA

Darren-  
EPA has spoken.  
Scott

-----Original Message-----

From: Kloss.Sarah@epamail.epa.gov [mailto:Kloss.Sarah@epamail.epa.gov]  
Sent: Thursday, September 27, 2007 15:43  
To: Gromko, Scott CTR OASN (I&E) BRAC PMO West  
Cc: Chesnutt.John@epamail.epa.gov; Dreyfus.Bethany@epamail.epa.gov  
Subject: EPA draft Big Picture Comments for Hangar 1 EE/CA

Hi Scott,

Below are the EPA Big Picture Comments. Please call me if you have any questions or concerns. I think the issues that we may need to discuss further are where ICs fit into this action, the boundary between Site 25 and Site 29, and the action plan for unpaved areas near the Hangar, which we consider part of the general site.

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Comments:

- The document should be clearer about which historic mitigation measures will be carried out as part of this action. This is particularly unclear in the discussion of historic mitigation for alternative 10 and the cost table in section 5.
- Section 4.4, Please provide more information about which regulatory agency or agencies provided input on the historical mitigation measures. While EPA doesn't decide the adequacy of the historic mitigations measures, the document should discuss the adequacy of these measures under the state acceptance (and potentially community acceptance) sections.
- The Navy should discuss the structural integrity of the hangar when the siding is removed and only the steel frame remains. We believe more in depth analysis has been done; however, that information has not been included in this report.
- Term "Materials of Concern" (Page ES-2) - There is no term "materials of concern" in CERCLA. Use of this term in the document is confusing. As highlighted in Table 2-1, lead and asbestos have both been released to the environmental at unacceptable levels. While we agree that PCBs are the primary risk driver, lead and asbestos are also Site 29 COCs. Thus, the RAO should be to prevent the migration of all COCs, not just PCBs.
- Please define the boundary between Site 25 and Site 29. The storm drains connecting the two sites are not accounted for in either site. Since the source of contamination (Hangar 1) was not eliminated, the storm drains may have been recontaminated.
- We need to start thinking about ICs now, rather than later. Although it is acceptable to defer ICs determinations until remedial action is taken, it is not required. The Navy should clarify exactly where the ICs determinations will be made. This is something we will eventually need to discuss in more detail.
- Because the WATS plume may be under Hangar 1, vapor intrusion may be a concern as far as ICs. Although we would expect that to be addressed in the vapor intrusion FS, it should be acknowledged in the EE/CA.

-Navy's response to EPA's comment 19 does not respond to the comment. WATS does not have the capability of treating the COCs for Hangar 1. If there is not a concern regarding groundwater contamination, then a better argument should be made about why the contaminants at Hangar 1 are not a concern as far as groundwater contamination rather than arguing that WATs can take care of possible groundwater contamination.

-Does the Mountain View Library contain the AR for Hangar 1? It should. San Diego alone is not acceptable in terms of access.

-RAOs for cleanup should include carrying out a post-construction "clean closure" plan. This plan should be consistent with the cleanup levels set for Site 25. The plan should include the stormwater trench which could have been recontaminated after the TCRA in 2003. Ultimately, in the site work plan, we will want defined confirmation levels used to determine that the concrete is clean and the storm drains are clean.

-The site has unpaved areas that are not mentioned in this document. The EE/CA should contain information about when and how these unpaved areas will be addressed. If this EE/CA is for Site 29, why are these areas not considered part of the site?

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Thanks,  
Sarah Kloss  
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