



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

September 12, 2008

Mr. Darren Newton
BRAC Environmental Coordinator
Navy BRAC Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Subject: Engineering Evaluation/ Cost Analysis, Revision 1, Installation Restoration Site 29, Hangar 1, Former Naval Air Station Moffett Field, Moffett Field, CA

Dear Mr. Newton:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject report, dated July 2008. Since the current response action is being conducted under removal authority, the enclosed comments are limited to general comments targeted at the protectiveness of the selected removal action and how the selected removal action will tie into a long-term final remedy at Site 29.

If you have any questions or concerns, please contact me by phone, (415) 972-3156, or by electronic mail, kloss.sarah@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Kloss", is written over the typed name.

Sarah Kloss
Remedial Project Manager
Superfund Federal Facility Branch
US EPA, Region IX

cc: Ms. Elizabeth Wells, RWQCB

U.S. EPA Review of the Engineering Evaluation/ Cost Analysis, Revision 1, Installation Restoration Site 29, Hangar 1, Former Naval Air Station Moffett Field, Moffett Field, CA, July 2008

GENERAL COMMENTS

1. Since the current response action for Hangar 1 is being conducted under removal authority, the enclosed comments are limited to general comments targeted at the protectiveness of the selected removal action and how the selected removal action will tie into a long-term final remedy at Site 29.
2. **Lead and asbestos as hazardous materials:** The EE/CA identifies lead and asbestos as hazardous materials at the Site. However, the RAOs for the EE/CA are limited to the prevention of release of the PCBs only. As the Navy did in the 2004 Time Critical Removal Action for the Hangar, the RAOs should identify that PCBs are the regulatory driver for the removal and identify the objective of the removal action as the prevention of migration of all hazardous substances, including PCBs, lead, and asbestos, from the Site into the environment.
3. The Navy has isolated the work to be done in this removal action from other work that will need to be done to complete characterization, cleanup, and controlling potential exposure from Site 29. The EPA does not agree that assessing the extent of Site 29 contamination should be outside the scope of this removal action. As a part of the removal action, the Navy should conduct sampling to confirm that there is no residual contamination at or above levels of concern for all affected media at Site 29. The areas subject to confirmation sampling include:
 - Soil in all the unpaved areas adjacent to the Hangar;
 - Any part of the stormwater pathway from Hangar 1 to Site 25 that is not included in the scope of the remedial action at Site 25; and
 - Any portions of the former structure that are left in place, including the concrete floor
4. Any data gaps not addressed by the removal action must be addressed by the Navy in an RI/FS for Site 29. Based on the results of confirmation sampling during the removal action and the results of any additional sampling required by the regulatory agencies, the Navy must evaluate the following:
 - Remedial actions necessary to address any residual Site 29 contamination not included in the scope of this removal action;
and
 - If the selected removal alternative allows waste to be left in place, evaluation of Institutional Controls to prevent exposure to residual contamination. As a part of the restrictions on future use, the RI/FS will also have to assess the need for vapor

intrusion mitigation measures related to Site 28, WATS area, contamination beneath the Hangar footprint.

5. Concrete is a porous surface under TSCA (40 C.F.R. §761.3). The EE/CA states that some wipe samples of the concrete floor of the Hangar have concentrations higher than TSCA requirements for non-porous surfaces. These wipe sample results suggest the potential for contamination within the concrete floor slab. Since the concrete floor slab is considered a porous surface under TSCA, wipe samples alone are insufficient for sampling to determine whether or not the concrete floor slab is contaminated with PCBs at or above levels of concern. (See 40 C.F.R. §761.60(b)(8)). Also, the EE/CA only mentions one core sample result for PCBs for the entire concrete floor pad. Assuming the area dimensions in the EE/CA are correct, that means there is only one core sample for approximately 8 acres of floor space. The Navy must conduct additional core sampling as a part of the confirmation sampling protocol for this removal action to determine whether the concrete pad is contaminated with PCBs at or above levels of concern. The description of alternative 10 includes pressure washing the concrete floor slab. Pressure washing could potentially remove PCBs on the surface of the concrete; however, because the concrete is a porous surface, the PCBs may have migrated below the surface within the concrete. Until the Navy provides more evidence that the PCB contamination for the concrete floor slab is limited to the surface, the EPA does not agree with pressure washing as the only action for the concrete. Thus, alternative 10 does not adequately address the concrete slab. Please add core sampling of the concrete floor slab to the removal action.
6. The EE/CA states that Hangar 1 COCs have not contaminated groundwater at Site 29. However, this data was not included in the EE/CA report. Please revise the report to include the groundwater data. Also, the EE/CA makes statements, as on page 3-7, that the WATS treatment system will treat any pollutants from Hangar 1. This statement is incorrect. The WATS system is not designed to treat PCBs, lead, or asbestos. Thus the Navy should remove that assertion from the EE/CA.
7. Although groundwater contamination from Site 29 COCs, pending review of the data, does not appear to be an issue at this site, there is evidence to suggest that the groundwater beneath Hangar 1 is contaminated with volatile organic compounds (VOCs). The EPA expects this VOC contamination to be addressed as part of the Navy's responsibilities for Site 28, WATS area
8. The EPA appreciates that the Navy conducted a structural analysis of the removal alternatives as part of the EE/CA; however, the details of this analysis are not included in the report. Since this analysis was an important supporting document for the EE/CA, it should be included as an appendix. If the document is not appended to the EE/CA itself, the EE/CA should specifically reference where the structural analysis report can be found.

9. In reference to Alternative 10, there are potential safety issues related to bird nesting in the Hangar frame. The EE/CA should include the evaluation and cost analysis of measures to mitigate this potential safety hazard.
10. **Boundary between Sites 25 and 29:** It is unclear which Site will address ensuring the cleanup of the storm drains between the Hangar and Site 25. This EE/CA states on page 3-7 that the removal action will stop at the Hangar structure itself and that downgradient contamination will be addressed at Site 25. However, the document should explicitly identify which site will address the storm drains connecting Site 25 and Site 29.
11. **Definition of "On-Site":** In section 3.5.1, the EE/CA defines on-site areas to be only Hangar 1. To be accurate, on-site areas include the structure as well as any adjacent areas necessary to accomplish the removal action.
12. **BAAQMD Reg 2, Rule 2-301:** On page 3-12, the text of the EE/CA indicates that appropriate dust control measures will be in place to prevent triggering of this regulation. There is not sufficient information in the EE/CA to determine whether this is the case. The Removal Action should set forth the monitoring methodology that will be used to confirm that the action will comply with this regulation.
13. **BAAQMD Reg 6-311:** Despite the fact that there are no production processes involved at the Hangar, BAAQMD Regulation 6-311 could be relevant and appropriate to any general operation that would release particulates. Therefore, this regulation should be identified as an ARAR.
14. **California Water Code §13307.1(c):** As discussed in EPA's fourth comment above, the EE/CA explains that this removal action will not address institutional controls that may be necessary at the conclusion of the action, but rather that such controls may be addressed in a future document. Where there will be any waste left in place, institutional controls will be required at this Site, although they may be established in a follow-on action.
15. The Hangar is located alongside an active runway. The Removal Action should account for any FAA regulations relevant to the removal action itself as well as the final design of the selected alternative.
16. **PCB Storage for Disposal:** There appears to be a typo in Table 3-5 (Page 5 of 7), misidentifying subsections of 40 CFR §761.65 that are described as potentially applicable to this action. The section identifies subsection (c)(7) which applies to liquid PCB waste as an ARAR although there is not liquid PCB waste involved in this action. But the section fails to identify the potentially applicable subsection (c)(5) which explains the frequency with which stored articles must be checked for leaks.