



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

October 3, 2008

Darren Newton, BRAC Environmental Coordinator  
Southwest Division Naval Facilities Engineering Command  
1455 Frazee Road, Suite 900  
San Diego, CA 92108

Re: EPA Comments on the Draft Final *Proposed Plan for Site 25 and Upland Source Areas*, Former Naval Air Station Moffett Field (dated September 5, 2008)

We have reviewed the Navy's, Draft Final *Proposed Plan for Site 25 and Upland Source Areas* (PP), Former Naval Air Station Moffett Field, California, including the related Fact Sheet and Responses to Comments Table. The submitted documents incorporate changes which adequately address EPA's comments on the Draft PP, dated July 15, 2008. Our comments on the Draft Final PP are provided below.

## GENERAL COMMENT

1. The PP addresses contamination at Site 25 and a number of "upland source areas, including Site 8" and states that technical information and test results have been "carefully evaluated." EPA generally concurs with the Navy's approach to address the contamination at these sites in a coordinated manner because of the interconnectivity of the contamination; however, based on information included in the existing Addenda to the Revised Final Station-Wide Remedial Investigation Report (RI) and Feasibility Study (FS) for Site 25, dated 2005 and 2007, respectively, the extent of contamination and the remedial alternatives at the "upland source areas" have not been sufficiently evaluated or documented. Sampling to determine the extent of contamination and an evaluation of whether the remedial alternatives considered for Site 25 are also appropriate at the upland source areas should be conducted.
2. Figures in the Fact Sheet and PP show the pole-mounted transformers in the Wescoat

and Orion Park Housing areas and text states that these transformers will be included in the proposed remedial action. It is unclear whether the Navy intends to address these areas. It is our understanding, based on BCT discussions that the Navy does not intend to address these sources. It is also unclear whether or not PCB contamination in some or all of these areas may have already been removed. According to the June 2000 Finding of Suitability to Federally Transfer the Onizuka Housing Property, Annex II and III Onizuka Air Station Annex, California, "as of June 1998 all PCB equipment within the housing parcels had been removed." Clarify if the Navy will remediate these sources or how their cleanup will impact the overall action at Site 25 and the other upland source areas.

## **SPECIFIC COMMENTS**

1. The last sentence on page 1 of the PP which encourages public comment should include a reference to the blue "Notice" box below for information on the public comment period and public meeting.
2. The Site Description and Nature and Extent of Contamination at Site 25 sections of the PP refer to Lindbergh Avenue and the Lindbergh Avenue ditch. None of the figures shows where these features are at Moffett. If these references are necessary, revise the descriptions to provide some information regarding the location of these areas.
3. A significant amount of time has transpired since the sampling efforts described in the RI and FS, the remedial design should include additional sampling at Site 25 to confirm that the polygons proposed to be addressed by the remedial action are appropriate and comprehensive.
4. The quality of Figures 3 and 5 of the PP could be improved. The grey lines are not very distinct. It would be especially helpful to make the boundaries between the Stormwater Settling Basin/Eastern Diked Marsh, Eastern Diked Marsh/Central Basin and Central Basin/Northeast Basin darker in Figure 3 since they are discussed in the text. Also, the figures should be revised to include some directional notations.
5. Table 2 indicates that Alternative 3 includes treatment of contaminated sediments and that "treatment would likely be conducted in place (in situ), but could also be conducted elsewhere at Site 25 (ex situ, or after the sediment is excavated)." This statement seems somewhat inconsistent with the 5<sup>th</sup> arrow in the Preferred Alternative section which indicates that there is minimal short-term risk "because contaminated sediment would be treated on site before it is excavated." Review and revise these statements for consistency.

We appreciate the opportunity to review this document. These comments comply

with the September 18, 1990 Federal Facility Agreement. If you have questions regarding these comments, please feel free to contact me at (415) 947-4117.

Sincerely,

A handwritten signature in black ink that reads "Yvonne Fong". The signature is written in a cursive style with a large, prominent "Y" and "F".

Yvonne Fong  
Remedial Project Manager

cc: Mark Walden, Navy  
Elizabeth Wells, RWQCB  
Ann Clarke, NASA  
Donald Chuck, NASA