

5090
Ser 6426/9147
23 Sep 1999

Dr. Lynn Suer
U.S. Environmental Protection Agency,
Region 9, SFD-8-2
75 Hawthorne Street
San Francisco, California 94105

**Subj: REVISED FEDERAL FACILITY AGREEMENT SCHEDULE FOR MOFFETT
FEDERAL AIRFIELD, CALIFORNIA**

Dear Dr. Suer:

Although all parties involved in the Moffett Federal Airfield (MFA) cleanup have worked continually to complete all remedial actions for the stationwide and petroleum sites, these cleanups have taken longer than anticipated. This letter presents a revised schedule for remaining documents and activities subject to the federal facility agreement (FFA) at MFA. Although the schedule for individual documents subject to the FFA has been modified, there has been no facility-wide update since the FFA amendment dated December 17, 1993. Therefore, the schedule attached to this letter updates the December 1993 amendment. Several main areas remain to be completed at MFA: the Site 22 landfill, stationwide sites, and the Northern Channel. Remedial action completion reports also remain to be completed for the operable unit (OU) 1 landfill cap, the east-side aquifer treatment system (EATS), and the west-side aquifers treatment system (WATS). All the other documents listed on the December 1993 schedule have been completed. Prior to this update, a comprehensive revision of the FFA schedule was not deemed necessary; rather, the schedules for individual operable units were extended as needed by separate schedule extension letters. The rationale for extending the FFA schedule is presented below.

The Site 22 landfill, which was originally included with the stationwide sites, has been addressed separately to focus directly on the unique concerns it presents. Discussions concerning the most appropriate remedy for this landfill have been ongoing with the regulatory agencies for several months resulting in delays in the FFA schedule. A consensus has recently been reached on an appropriate remedy (surface debris removal) and the schedule for Site 22 tasks is more clearly defined.

The main areas of concern for the stationwide sites include wetland areas in the Eastern Diked Marsh and the stormwater retention ponds as well as the Northern Channel. The stationwide sites also include several miscellaneous areas where no further action is anticipated. Additional time is necessary to complete the documents related to the stationwide sites based on technical and administrative issues. Negotiations to establish cleanup levels for wetlands have been under way since about mid-1995 and have only recently been completed for wetland areas on the western side of MFA (Eastern Diked Marsh and stormwater retention pond). Resolution of technical issues such as selection of appropriate ecological receptors and contaminants of concern was the main reason for the extension of the stationwide schedule. Negotiations for these sites were unusually difficult since ecological risk

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assessment was in its infancy when the wetland area investigation began and has been an ever-evolving science over the past 5 years. Finally, since the National Aeronautics and Space Administration (NASA) has recently decided not to dredge the Northern Channel, which affects the Navy's intended remedy for the Northern Channel, completion of that portion of the stationwide document will be submitted separately.

Remedial action completion reports for OU1, EATS, and WATS have been added to the schedule at your request.

If you have any questions or comments, please call me at (650) 244-2563.

Sincerely,

ORIGINAL SIGNED BY:
STEPHEN CHAO
BRAC Environmental Coordinator

Copy to:

U.S. Environmental Protection Agency (Attn: Ms. Eugenia Chow)
San Francisco Bay Regional Water Quality Control Board (Attn: Mr. Joseph Chou)
National Aeronautics and Space Administration (Attn: Ms. Sandra Olliges)
Tetra Tech EM Inc. (Attn: Mr. Tim Mower)

Blind copy to:

642, 6421, 6422, 6426
Chron
Admin Record (2)
File: MFA

**MODIFICATIONS TO ATTACHMENT 3
OF THE FEDERAL FACILITY AGREEMENT SCHEDULE
MOFFETT FEDERAL AIRFIELD
(September 16, 1999)**

SITE 22 LANDFILL

| DOCUMENT AND ACTIVITY | DEADLINE | TARGET |
|--|--------------------------|--------------------|
| Draft Remedial Design and Remedial Action (RD/RA) Schedule | October 8, 1999 | -- |
| Draft Final RD/RA Schedule | per consultation section | November 12, 1999 |
| Draft Alternatives Analysis Technical Memo | March 3, 2000 | -- |
| Draft Proposed Plan | March 24, 2000 | -- |
| Draft Record of Decision (ROD) | April 24, 2000 | -- |
| Draft Final Proposed Plan | per consultation section | April 28, 2000 |
| Final Alternatives Analysis Technical Memo | per consultation section | May 3, 2000 |
| Final Proposed Plan | per consultation section | May 31, 2000 |
| Draft Final ROD | per consultation section | July 10, 2000 |
| Final ROD | per consultation section | September 7, 2000 |
| Final RD/RA Schedule | per consultation section | September 11, 2000 |
| Draft Remedial Action Completion Report | February 16, 2001 | -- |
| Final Remedial Action Completion Report | per consultation section | May 17, 2001 |

STATIONWIDE SITES

| DOCUMENT AND ACTIVITY | DEADLINE | TARGET |
|---|--------------------------|-------------------|
| Revised Final Feasibility Study Report | September 30, 1999 | -- |
| Draft Proposed Plan | October 20, 1999 | -- |
| Draft ROD | November 19, 1999 | -- |
| Draft Final Proposed Plan | per consultation section | November 24, 1999 |
| Final Proposed Plan | per consultation section | December 24, 1999 |
| Draft Final ROD | per consultation section | February 2, 2000 |
| Final ROD | per consultation section | April 3, 2000 |
| Draft RD/RA Schedule | July 2, 2000 | -- |
| Draft Final RD/RA Schedule | per consultation section | October 31, 2000 |
| Final RD/RA Schedule | per consultation section | February 28, 2001 |
| Draft Remedial Action Completion Report | October 29, 2001 | -- |
| Final Remedial Action Completion Report | per consultation section | January 28, 2002 |

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OF THE FEDERAL FACILITY AGREEMENT SCHEDULE
MOFFETT FEDERAL AIRFIELD
(September 16, 1999)**

NORTHERN CHANNEL

| DOCUMENT AND ACTIVITY | DEADLINE | TARGET |
|--|--------------------------|--------------------|
| Draft Proposed Plan | June 23, 2000 | -- |
| Draft Alternatives Analysis Technical Memo | July 6, 2000 | -- |
| Draft ROD | July 24, 2000 | -- |
| Draft Final Proposed Plan | per consultation section | July 28, 2000 |
| Final Alternatives Analysis Technical Memo | per consultation section | September 18, 2000 |
| Final Proposed Plan | per consultation section | September 19, 2000 |
| Draft Final ROD | per consultation section | October 23, 2000 |
| Final ROD | per consultation section | December 21, 2000 |
| Draft RD/RA Schedule | March 26, 2001 | -- |
| Draft Final RD/RA Schedule | per consultation section | July 24, 2001 |
| Final RD/RA Schedule | per consultation section | November 21, 2001 |
| Draft Remedial Action Completion Report | July 22, 2002 | -- |
| Final Remedial Action Completion Report | per consultation section | October 20, 2002 |

OPERABLE UNIT 1

| DOCUMENT AND ACTIVITY | DEADLINE | TARGET |
|---|--------------------------|------------------|
| Draft Remedial Action Completion Report | October 29, 1999 | -- |
| Final Remedial Action Completion Report | per consultation section | January 27, 2000 |

**EAST-SIDE AQUIFER TREATMENT SYSTEM
(OPERABLE UNIT 5)**

| DOCUMENT AND ACTIVITY | DEADLINE | TARGET |
|--|--------------------------|-------------|
| Final Operation and Maintenance (O&M) Plan | January 14, 2000 | -- |
| Draft Remedial Action Completion Report | February 16, 2000 | -- |
| Final Remedial Action Completion Report | per consultation section | May 3, 2000 |

WEST-SIDE AQUIFERS TREATMENT SYSTEM

| DOCUMENT AND ACTIVITY | DEADLINE | TARGET |
|---|--------------------------|------------------|
| Draft Final O&M Plan | September 24, 1999 | -- |
| Final O&M Plan | per consultation section | January 28, 2000 |
| Draft Remedial Action Completion Report | April 3, 2000 | -- |
| Final Remedial Action Completion Report | per consultation section | June 19, 2000 |

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Notes:

Consultation section (FFA section 9) provides for 45-day review (plus a 15-day extension at the regulatory agencies' request) for draft documents and 30-day review for draft final documents. The above schedule assumes 21-day review for draft proposed plans and 15-day review for draft final proposed plans.

N00296.003274
MOFFETT FIELD
SSIC NO. 5090.3.A.

FEDERAL FACILITY AGREEMENT AMENDMENT

DATED 17 DECEMBER 1993

IS FILED AS ADMINISTRATIVE RECORD NO.
N00296.002035