



DEPARTMENT OF THE NAVY  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132-5190

Cert. No. P 115 386 609  
5090  
Ser 06CT.EKD/304  
21 Apr 00

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency Region IX  
Attn: Ms. Roberta Blank  
Remedial Project Manager  
Federal Facilities Cleanup Office (SFD 82)  
75 Hawthorne Street  
San Francisco, CA 94105-3901

**Subj: REQUEST FOR EXTENSION TO FEDERAL FACILITY AGREEMENT  
SCHEDULE FOR MOFFETT FEDERAL AIRFIELD, CALIFORNIA**

Dear Ms. Blank:

As stated in our letter 5090, Ser 06CM.MP/0242 of April 5, 2000, we are submitting this request for an extension to the Moffett Federal Airfield Federal Facility (MFAFF) Agreement (FFA) Attachment 3 – Timetables and Deadlines. The Golf Course Landfill #2; Stationwide Sites; Runway and Golf Course Landfills (OU 1); and East-side and West-side Aquifer Treatment Systems require time extensions to complete reports. Enclosure (1) presents our FFA schedule with revised deadlines and target dates. This request is made pursuant to Section 27.2 (2) and (5), and the reasons are listed below.

Site 22 – Golf Course Landfill #2 (Section 27.2 (5))

The remedy analyses have consumed far more time than what was previously estimated due to complexities at the site. We require additional time to complete the documents because we have conducted repeated discussions with the regulators for several months with a consensus only now being reached.

Station-wide Sites (Section 27.2 (5))

Eastern Dike Marsh and the Storm-Water Retention Ponds have ecological and wetland concerns. We have spent several months sorting out concerns at these sites with the regulators. Identifying ecological receptors and determining cleanup levels for the contaminants of concern has been cumbersome. It has been a challenge for all involved to conduct required tasks to establish cleanup levels in the absence of well-structured and reasonable guidance documents. Issues related to PCBs, heavy metals, and pesticides contamination at this site are still unresolved. We therefore require additional time to complete the tasks and the necessary documents.

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Runway Landfill and Golf Course Landfill (OU 1) (Section 27.2 (2))

We have experienced a delay in receiving regulatory agency comments on a draft document submitted on September 30, 1999. The complete regulator comments, incorporating much delayed Integrated Waste Management Board's comments, were received on April 5, 2000. Additional time is required to incorporate the comments and submit the Final Remedial Action Completion Report.

East-side Aquifer Treatment System (EATS)(Section 27.2 (5))

Unanticipated delays have occurred in getting the buildings constructed, treatment systems installed, and getting the system operational as designed. All site-specific conditions had to be addressed in getting the system running and this consumed more time than what was estimated, thus requiring an extension of time.

West-side Aquifer Treatment System (WATS) (Section 27.2 (5))

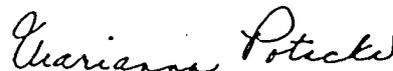
In addition to addressing site-specific conditions for the East-side Aquifer System, more time has been taken in resolving issues surfaced by three responsible parties attempting to cleanup a single contaminated regional plume. We therefore require a time extension for finalizing the O&M Plan.

We will include substantive content of Remedial Action Completion Reports in the O&M Plans for EATS and WATS.

We appreciate your participation and are pleased to mention that every person involved in the MFAFF cleanup has worked diligently to accomplish cleanup tasks that are faster, better and cost-effective. We look forward to a continued cooperative team effort and successful closure of the remaining projects.

If you have any questions or comments, please call me at (619) 532-0941.

Sincerely,



MARIANNA POTACKA  
Base Realignment and Closure  
Environmental Coordinator  
By direction of the Commander

Enclosure: 1. Attachment 3 – Revised Timetables and Deadlines

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San Francisco Bay Regional Water Quality Control Board  
Attn: Mr. Joseph Chou  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

National Aeronautics and Space Administration  
Attn: Ms. Sandra Olliges  
NASA Ames Research Center  
Moffett Federal Airfield, CA 94036

Tetra Tech EM, Inc.  
Attn: Mr. Timothy E. Mower, R.G.  
1099 18<sup>th</sup> Street, Suite 1960  
Denver, CO 80202

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**ATTACHMENT 3  
REVISED TIME TABLES AND DEADLINES  
OF THE FEDERAL FACILITY AGREEMENT SCHEDULE  
MOFFETT FEDERAL AIRFIELD  
(APRIL 21, 2000)**

**SITE 22 – GOLF COURSE LANDFILL #2**

DOCUMENT AND ACTIVITY	SEPTEMBER 1999 SCHEDULE		REVISED SCHEDULE		
	DEADLINE	TARGET	DEADLINE	TARGET	EXTENSION DAYS
Draft Alternatives Analysis Technical Memorandum	March 3, 2000	-	<i>October 28, 2000</i>		240
Final Alternatives Analysis Technical Memorandum	Per consultation section	May 3, 2000		<i>November 27, 2000</i>	209
Draft Proposed Plan	March 24, 2000	-	<i>January 26, 2001</i>		309
Draft Final Proposed Plan	Per consultation section	April 28, 2000		<i>May 26, 2001</i>	394
Final Proposed Plan	Per consultation section	May 31, 2000		<i>June 25, 2001</i>	391
Draft Record of Decision	April 24, 2000	-	<i>September 21, 2001</i>		516
Draft Final ROD	Per consultation section	July 10, 2000		<i>January 19, 2002</i>	559
Final ROD	Per consultation section	September 7, 2000		March 20, 2002	560
RD/RA Schedule	Per consultation section	September 11, 2000		<i>April 12, 2002</i>	579

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STATIONWIDE SITES - EASTERN DIKE MARSH AND STORMWATER RETENTION POND

DOCUMENT AND ACTIVITY	SEPTEMBER 1999 SCHEDULE		REVISED SCHEDULE		
	DEADLINE	TARGET	DEADLINE	TARGET	EXTENSION DAYS
Draft Proposed Plan	October 20, 1999	-	<i>September 21, 2001</i>		703
Draft Final Proposed Plan	Per consultation section	November 24, 1999		<i>January 19, 2002</i>	788
Final Proposed Plan	Per consultation section	December 24, 1999		<i>February 18, 2002</i>	788
Draft ROD	November 19, 1999	-		<i>March 8, 2002</i>	841
Draft Final ROD	Per consultation section	February 2, 2000		<i>July 6, 2002</i>	886
Final ROD	Per consultation section	April 3, 2000		<i>August 5, 2002</i>	855

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 MOFFETT FEDERAL AIRFIELD  
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SITE 1 -RUNWAY LANDFILL & SITE 2 – GOLF COURSE LANDFILL (OU 1)

DOCUMENT AND ACTIVITY	SEPTEMBER 1999 SCHEDULE		REVISED SCHEDULE		
	DEADLINE	TARGET	DEADLINE	TARGET	EXTENSION DAYS
Draft Remedial Action Completion Report	October 29, 1999 (September 30, 1999) (Actual)	-			
Final Remedial Action Completion Report		January 27, 2000		20 October 2000	268

SITE 26 – EAST-SIDE AQUIFER TREATMENT SYSTEM (OU 5)

DOCUMENT AND ACTIVITY	SEPTEMBER 1999 SCHEDULE		REVISED SCHEDULE		
	DEADLINE	TARGET	DEADLINE	TARGET	EXTENSION DAYS
Final O&M Plan (to include substantive content of Remedial Action Completion Report)	January 14, 2000	-	September 29, 2000		260

SITE 28 – WEST-SIDE AQUIFERS TREATMENT SYSTEM

DOCUMENT AND ACTIVITY	SEPTEMBER 1999 SCHEDULE		REVISED SCHEDULE		
	DEADLINE	TARGET	DEADLINE	TARGET	EXTENSION DAYS
Draft O&M Plan	September 24 99 (September 22 99) (Actual)	-			
Final O&M Plan (to include substantive content of Remedial Action Completion Report)		January 28, 2000		October 20, 2000	267