



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

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MOFFETT FIELD  
SSIC NO. 5090.3.A

September 30, 2002

Mr. Lawrence Lansdale, P.E.  
BRAC Environmental Coordinator  
Southwest Division  
Naval Facilities Engineering Command  
BRAC Operations (Code: 06Ch.LL)  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101-8517

RE: EPA Concurrence - Draft Final Interim Remedial Action Report  
West-Side Aquifers Treatment System (WATS)  
Moffett Federal Airfield, California, dated April 27, 2001

Dear Mr. Lansdale:

The U.S. Environmental Protection Agency (EPA) has reviewed the *Draft Final Interim Remedial Action Report West-Side Aquifers Treatment System (WATS), Moffett Federal Airfield, California*, dated April 27, 2001, the *West-Side Aquifers Treatment System (WATS) Upgrade Operation and Maintenance (O&M) Certification Report*, dated August 6, 2001, and the *Certification Report Addendum for the West-Side Aquifers Treatment System Upgrades*, dated August 16, 2001.

Finalization of the WATS Interim Remedial Action Report (IRAR) was discussed at the BRAC Closure Team (BCT) meeting on June 14, 2001. The BCT meeting minutes indicate that "the certification of the WATS operations would be pending as there are two remaining operations issues: the flow of the EA1-1 extraction well and the system coming back online. The EPA will evaluate certification of the WATS operations after WATS is running again and the annual report has been reviewed." As you know, WATS was shut down on March 28, 2001 due to the exceedance of acetone in the system effluent. The treatment system was upgraded to ensure that the WATS effluent meets the NPDES discharge limits. After the WATS upgrades were completed on July 17, 2001, and after the required NPDES testing was completed, WATS resumed operations on July 27, 2001.

Without independent investigation or verification of certain information contained in the IRAR, EPA concurs with the Draft Final IRAR that the construction of the remedy for WATS is complete and that the remedy is "operating properly and successfully". However, EPA continues to have significant concerns with respect to extraction well EA1-1's low mass removal rate and questionable capture zone. EPA will continue to work with the Navy to optimize system performance and to ensure that cleanup levels are met. If you have any questions regarding this letter, please contact Alana Lee, the EPA Project Manager, at (415) 972-3141.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Jordan".

Deborah Jordan  
Federal Facility and Site Cleanup Branch Chief  
Superfund Division