

CENTER FOR PUBLIC ENVIRONMENTAL OVERSIGHT

A project of the Pacific Studies Center

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July 25, 2007

Darren Newton  
BRAC Environmental Coordinator, Moffett Field  
Base Realignment and Closure Program Management Office West  
U.S. Navy  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310

Dear Mr. Newton:

Thank you for the opportunity to comment on the Draft East-Side Aquifer Treatment System Evaluation Report. This letter represents the concerns of the Center for Public Environmental Oversight as well as its Community Advisory Board for local Superfund sites.

As I stated at the July 12, 2007 meeting of the Moffett Field Restoration Advisory Board, we supported the Navy's decision to turn off the pump-and-treat systems at the Moffett East-Side Aquifer and to conduct studies of alternate technologies, such as nutrient enhancement.

We are troubled, however, by the Navy's proposal to rely upon monitored natural attenuation as the sole remedy at the East-Side Aquifer from here on out.

We draw four main conclusions from the Evaluation Report:

1. Discontinuation of pump-and-treat operations has made little difference in the concentration and spread of the contaminants of concern.
2. In portions of the groundwater plume with relatively higher concentrations of TCE and PCE, nutrient enhancement successfully accelerated the breakdown of those contaminants.
3. At portions of the plume with relatively lower concentrations of TCE and PCE, nutrient enhancement appears to have had a minor impact.
4. Either with nutrient enhancement or monitored natural attenuation, there may be insufficient bacteria of the right strains to break down the daughter products. In particular, there is a chance that dechlorination will stall at vinyl chloride, a highly toxic substance in its own right.

We believe that the objective of remedial action is to achieve remediation goals in a timely fashion, and to ensure that contaminant degradation is complete—that is, that it does not increase the risk from daughter products.

Therefore, we urge the Navy to take advantage of its successful pilot study and expand nutrient enhancement to portions of the plume with higher levels on chlorinated compounds. Furthermore, we ask the Navy to test bioaugmentation—the addition of bacteria capable of degrading vinyl chloride—to complete the dechlorination process.

Furthermore, we are disappointed that the Navy has not evaluated the volatilization potential of these contaminants. Are there any structures above the plume? Might any be built in the future? If so, what investigations or mitigation are necessary to ensure that vapor intrusion does not pose unacceptable risks at this site? In addition, are portions of the plume likely to daylight into surface waters such as the San Francisco Bay and its wetlands? If so, will such contamination pose an ecological risk or, through volatilization, a public health hazard?

Finally, we wish to point out that the CD-ROM containing the Evaluation Report in a single PDF file was particularly difficult to navigate. In the future, it would help if the Navy and its contractors were to break down the file into several sections, provide internal links in the Table of Contents, and/or list in the Table of Contents real page numbers for each chapter and appendix.

Sincerely,

(submitted electronically)

Lenny Siegel  
Executive Director