

## THE LEAGUE OF WOMEN VOTERS



LWV Cupertino-Sunnyvale

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30 August 1989

Anne McMillan  
Public Affairs Office  
Naval Air Station  
Moffett Field, CA 94035

Dear Ms. McMillan:

The League of Women Voters is delighted to see the Interagency Agreement between the Environmental Protection Agency (EPA) Region IX, the California Department of Health Services, the California Regional Water Quality Control Board, and the United States Department of the Navy concerning federal Superfund cleanup activities at Moffett Field. It sets an excellent precedent for coordination and cooperation between various governmental agencies, a concept the League of Women Voters has long supported.

We urge you to change the deadline for well closures to August 1990. We believe that August 1991 is much too late for this process. It should have been done already. One year from now should be more than enough time to complete well closures. Most of the old wells have already been identified. We recognize that identification and cleanup of contaminated groundwater must be based on careful analysis of existing conditions and if done prematurely might create worse problems than those now existing. However, timely closure of potential conduits to lower aquifers is imperative.

We urge you to include a policy for coordinated oversight of cleanup of contamination comingled with plumes from other sites. This is missing from the agreement and should be added, especially since this agreement will probably act as a model for similar agreements in other parts of the country. Since nature does not respect legal and political boundaries, underground plumes of contaminated water from one site will often comingle with contamination from another site. Cleaning up such comingled plumes requires careful coordination and cooperation in order to prevent pulling the hazardous materials into uncontaminated areas. Such a mixed area of contamination exists on Moffett Field where the plume from the Middlefield-Ellis-Whisman site (MEW) has mixed with contamination from several smaller sites at Moffett Field. Different groups of people at the various agencies are responsible for overseeing these two sites. The agreement should include a guarantee that the state agencies and EPA will coordinate their work on the two sites in order to prevent duplication of effort and to expedite efficient cleanup.

We urge you to specify a faster time schedule for work on those Moffett Field sites which comingle with the MEW plume. The MEW cleanup is slated to move ahead on a much earlier schedule than the Moffett cleanup anticipated in the agreement. This speedup of the process on one part of the Moffett Field is necessary in order to accurately define the extent of contamination so that the MEW cleanup can proceed on time without risking moving the Moffett contamination into uncontaminated areas.

Since the public feels uncomfortable about not having cleanup of the Moffett Field contamination sites start until July 1995, it would be desirable to have a statement in the agreement acknowledging that appropriate interim cleanup measures will be done during the development of the Feasibility Study and Proposed Plan.

In summary, we are making the following suggestions:

- (1) Change the deadline for well closures from August 1991 to August 1990.
- (2) Add a policy for coordinated oversight of cleanup of the Moffett sites which comingle with plumes from other sites.
- (3) Specify a faster time schedule for work on Moffett sites which comingle with the MEW plume.
- (4) Add a statement about interim cleanup measures.

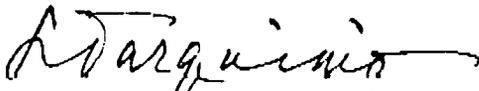
We also have a question: Who will be responsible for coordinating with the Bay Area Air Quality Management District to be certain that testing, monitoring, and cleanup procedures do not put toxic vapors into the air? We did not see this in the agreement.

We thank you for the opportunity for public comment and hope you will be able to find ways to incorporate our concerns into the document.

Sincerely,



Ann Coombs  
County League HazMat Coordinator



Laura Tarquinio, President  
LWV Los Altos-Mountain View Area



Linda R. Davis, President  
LWV Cupertino-Sunnyvale