

**TOM CAMPBELL**

12TH DISTRICT, CALIFORNIA

1730 LONGWORTH HOUSE OFFICE BUILDING  
WASHINGTON, DC 20518  
(202) 225-5411

DISTRICT OFFICES:

589 NORTH MATHILDA AVENUE, SUITE 105  
SUNNYVALE, CA 94088  
(408) 245-4835  
(415) 921-8184

1 CIVIC CENTER DRIVE  
SCOTT VALLEY, CA 95066  
(408) 438-7988

7415 EIGLEBERRY STREET, SUITE D  
GILROY, CA 95020  
(408) 848-5101



**Congress of the United States**  
**House of Representatives**

October 6, 1989

COMMITTEE ON SCIENCE, SPACE,  
AND TECHNOLOGY  
COMMITTEE ON SMALL BUSINESS  
CO-CHAIRMAN, TASK FORCE ON  
TECHNOLOGY AND POLICY  
CO CHAIRMAN,  
TASK FORCE ON TOXICS  
HOUSE COMPETITIVENESS CAUCUS  
ENVIRONMENTAL AND  
ENERGY STUDY CONFERENCE  
CONGRESSIONAL HUMAN RIGHTS CAUCUS  
ARMS CONTROL AND  
FOREIGN POLICY CAUCUS  
CONGRESSIONAL CAUCUS FOR  
WOMEN'S ISSUES

Mr. Michael Cain  
Environmental Division Director  
Public Affairs Office  
Naval Air Station  
Moffett Field, California 94035

Dear Mr. Cain:

I am writing to comment on the August 8, 1989 Interagency Agreement between the Department of the Navy, the U.S. Environmental Protection Agency, and the State of California.

First of all, let me commend the Navy and the other parties for entering into the agreement. I believe that the agreement establishes an excellent precedent for cooperation between various state and federal agencies. It also provides a good starting framework for providing a rapid cleanup of the Moffett sites to the satisfaction of all parties involved.

At the same time, I believe that certain elements of the agreement must be strengthened. In particular, I am concerned about the cleanup schedule as specified in the original agreement; its 1995 cleanup start is too much of a delay, and it does not provide for a proper coordination of regional cleanup schedules.

1. 1995 Cleanup Start: Actual cleanup must begin as soon as technically possible, but the current agreement allows numerous opportunities to further extend the 1995 target date. These loopholes should be closed and the policy reversed: opportunities should be included to move up the target date.

2. Coordinated Regional Cleanup: The federal agencies at Moffett Field should commit themselves to a schedule that coordinates with the schedule of other Superfund sites in the area, particularly the Middlefield-Ellis-Whisman (MEW) site. Technical data submitted by the MEW companies and independent scientists indicates that the Moffett and MEW plumes are co-mingled, thus making individual liabilities difficult to determine. Cleaning up the MEW site ahead of the Moffett sites, as presently proposed, may result in the migration of Moffett plumes into unaffected areas. This will compromise the effectiveness of any final remedial action by MEW or the Navy.

1820

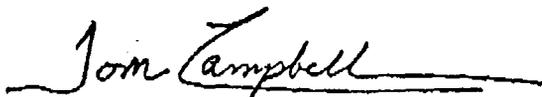
Mr. Michael Cain -- Page 2

The interagency agreement must address these technical realities, providing for immediate identification and control of Moffett's chemical residue sources, and for coordination of regional cleanup schedules.

It is essential that the above concerns and suggested improvements be incorporated into the final Interagency Agreement. As part of the public record, I would also like to submit a recent communication from the Navy to my office on this matter.

Thank you for the opportunity to comment on the Interagency Agreement and for your consideration of these views. Again, let me state the Interagency Agreement, if improved, should provide an excellent precedent for cleaning up contaminated federal sites across the country.

Best regards,



Congressman Tom Campbell

TC:jhs

Enclosure

cc: Alex Cunningham, Toxic Substance Div./State of CA  
Frank Swofford, U.S. Department of the Navy  
Daniel McGovern, Environmental Protection Agency  
Steven Ritchie, Regional Water Quality Control Board  
Ted Smith, Silicon Valley Toxics Coalition  
Stephen Quigley, Moffett Air Station  
League of Women Voters  
Bob Bostic, Schlumberger Technology Corporation  
Delos Knight, MacKenzie Communications  
Tom Trapp, Landels, Ripley, and Diamond  
James McClure, Harding Lawson Associates