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August 18, 1994

US Environmental Protection Agency
Office of Superfund Programs
Attn: Mr. Michael D. Gill
75 Hawthorne Street (H-9-2)
San Francisco, CA 94105-3901

Subj: NAS MOFFETT FIELD—REQUEST FOR SCHEDULE EXTENSION FOR THE
PHASE I SITE-WIDE ECOLOGICAL ASSESSMENT REPORT

Dear Mr. Gill:

Per our discussion in a teleconference call on August 3, 1994 and pursuant to Section 27 of the Federal Facility Agreement (FFA), an extension is hereby requested for submittal of the draft final and final Phase I Site-Wide Ecological Assessment (SWEA) report, and the Phase II SWEA work plan. Much discussion concerning the direction, approach, and scope of the SWEA has occurred, especially since January 1994 (Table 1). The Navy feels that, while these discussions have previously impacted the SWEA schedule, the discussions have not been without value. In fact, it is through this kind of open dialogue that the public interest will best be served with regard to ecological issues at Moffett Federal Airfield (formerly Naval Air Station [NAS] Moffett Field).

The Navy proposes that, because of the extensive comments on the draft Phase I SWEA report (submitted January 4, 1994) and the ongoing discussions between the Navy and the regulatory agencies, the draft final Phase I SWEA report submitted on July 18, 1994, be considered a revised draft report, rather than a draft final report. Also, previous conversations with the State regulators have indicated that the State will comment on the subject document, but as of the date of this letter, the Navy has not yet received those comments. If you concur, the Navy would further propose that the draft final Phase I SWEA report would be due on October 16, 1994, which allows for a 45-day comment period and a 45-day revision period (Table 1). The final Phase I SWEA report would then be due on November 15, 1994. In addition, the draft Phase II SWEA work plan would be submitted concurrently with the draft final Phase I SWEA report (October 16, 1994, rather than the current date of September 1, 1994). This is because the Phase II SWEA work plan is contingent on the results of the Phase I SWEA report.

If you have any questions please call me at (415) 244-2563.

Sincerely,

original signed by

Stephen Chao
BRAC Environmental Coordinator

2097

Copy to:

Mr. C. Joseph Chou/DTSC

Mr. Ron Gervason/RWQCB

Ms. Susan Gladstone/RWQCB

Ms. Bobbye Smith/EPA

Ms. Sandra Olligas/NASA

Mr. Peter Strauss/MHB Consultants

Dr. Joseph P. LeClaire/Montgomery Watson

Mr. Mike Young/PRC Environmental Management, Inc.

Blind copy to:

Admin record (2 copies)

FILE: NAS Moffett Fld

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TABLE 1
NAS MOFFETT FIELD
SWEA CHRONOLOGY OF EVENTS—JANUARY 1994-NOVEMBER 1994

Date	Party	Event
January 4, 1994	Navy	Submittal of Draft Phase I SWEA Report
January 7, 1994	Navy	Submittal of Draft Phase I SWEA Report errata sheets
February 14, 1994	All	Agency site walk
February 23, 1994	All	RPM meeting at RWQCB—Presentation of major findings of Phase I SWEA, conceptual approach to Phase II SWEA
February 28, 1994	EPA, NOAA	Comments on Draft Phase I SWEA Report
March 7, 1994	DTSC, RWQCB	Comments on Draft Phase I SWEA Report
March 28, 1994	SVTC	Site-walk with SVTC
April 1, 1994	All	SWEA meeting at EPA to discuss the following issues: screening criteria, background levels, TPH, data gaps (geographic footprint), additive and synergistic risk, food chains/receptors, assessment endpoints. A preliminary set of new agency COC screening criteria was presented by DTSC. Agreement was reached on receptors and assessment endpoints.
April 13, 1994	All	RPM meeting at WESTDIV—Navy to prepare a table comparing agency and Navy criteria.
April 20, 1994	Navy	Navy submitted a table which compared agency and Navy criteria and a table which showed which chemicals were screened out and which were retained as COCs using Navy screening criteria.
April 28, 1994	Navy/ DTSC	Teleconference between DTSC and Montgomery Watson to discuss the table comparing the screening criteria and the approach to rescreening the COCs.
May 3, 1994	All	SWEA/RPM meeting at Montgomery Watson's office to discuss the following issues: screening criteria, detection limits, PAHs/mixtures of chemicals
May 6, 1994	All	Teleconference concerning COC selection.
May 6, 1994	Agencies	Submittal of letter—"Regulatory Agencies Position on the Selection Criteria for the Phase I Ecological Assessment."
May 25, 1994	Navy	Facsimile of initial comments on agency screening criteria.
June 6, 1994	EPA	Submittal of letter—"Clarification of SWEA Screening Criteria"
June 7, 1994	All	RPM meeting at DTSC—Draft Final SWEA report to only consist of (i) executive summary; (ii) response to agency comments on the draft Phase I SWEA report; and (iii) results of the rescreening.
June 8, 1994	Navy	Submittal of letter—Extension request for draft final and final Phase I SWEA report; acceptance of the new agency screening criteria with attached clarifications.
June 8, 1994	Navy, NASA, Boeing, USFWS	Ecological site walk
June 21, 1994	Navy	Ecological site walk with Navy biologist
June 22, 1994	Navy/ DTSC	Ecological site walk with DTSC
July 11, 1994	All	SWEA meeting at PRC's office to discuss scope and approach of Phase II SWEA. Data gaps from Phase I SWEA agreed upon.
July 18, 1994	Navy	Submittal of the draft final Phase I SWEA Report
July 29, 1994	Navy, USACE	Site walk of artificially-created wetland-like area in the south part of the runways
August 1, 1994	Navy/ EPA	Teleconference between Navy and EPA discussing preliminary EPA comments on draft final Phase I SWEA report.
August 3, 1994	All	Teleconference on preliminary EPA comments on draft final Phase I SWEA report.
August 17, 1994	Navy	Submittal of the final Phase I SWEA report
October 16, 1994*	Navy	Submittal of draft final Phase I SWEA report
November 15, 1994*	Navy	Submittal of final Phase I SWEA report
September 1, 1994	Navy	Submittal of draft Phase II SWEA work plan
October 16, 1994*	Navy	Submittal of draft Phase II SWEA work plan

*Proposed dates. All other dates are actual dates or current FFA deliverable dates.
Shading denotes FFA deliverable.