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09ER5/5237
31 Mar 1995

Ms. Elizabeth Adams
U.S. EPA Region 9, Mail Stop H-6-5
75 Hawthorne Street
San Francisco, California 94105

Mr. Michael Gill
U.S. EPA Region 9, Mail Stop H-6-3
75 Hawthorne Street
San Francisco, California 94105

**SUBJ: NAVY POSITION ON REMEDIATION OF EXPANDED SITE 9 AREA
AT MOFFETT FEDERAL AIRFIELD**

Dear Ms. Adams and Mr. Gill:

The purpose of this letter is to reiterate the Navy's position with respect to requirements and responsibilities for long-term remediation within the west-side aquifers at Moffett Federal Airfield (MFA). In summary, the Navy's position is as follows:

- The Navy will provide hydraulic control of the expanded Site 9 area.
- The Navy will remediate all Navy sources in the expanded Site 9 Area.
- Once all Navy sources in the expanded Site 9 area have been remediated, the Navy retains the right to petition to have source control recovery wells (SCRWs) revert to regional recovery wells (RRWs) in accordance with the requirements identified in the Regional Groundwater Remediation Program design.

The Navy continues to believe that any significant unidentified contaminant sources affecting groundwater quality and subsequent remediation would be evident from available data. The Navy has conducted a comprehensive and thorough investigation of soils and groundwater on the western side of MFA. These investigations have involved more than 300 soil borings, 230 cone penetrometer tests and HydroPunch samples, 9 soil gas surveys (320 samples), and 200 monitoring wells throughout the area. The Navy will not be responsible for continuously evaluating the alleged existence of additional sources, when the data to date do not indicate source presence. This issue was addressed during the additional investigation of inferred sources (AIIS). It is the Navy's understanding that the U.S. Environmental Protection Agency (EPA) considers the AIIS sufficient as evidenced by EPA's letter dated December 17, 1993 from Michael Gill.

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The Navy has continually attempted to coordinate all of the activities conducted at MFA with other potentially responsible parties (PRPs). The Navy will continue to represent the best interests of the public in dealing with the environmental problems at Moffett Federal Airfield, and in doing so remains committed to the remediation of Navy contamination at Moffett Federal Airfield. Should you have any additional questions or concerns, please contact me at (415) 244-2563.

Sincerely,

Original signed by:

STEPHEN G. CHAO, P.E.
BRAC Environmental Coordinator

Copy to:

Department of Toxic Substances Control (Attn: Mr. Joseph Chou)
Regional Water Quality Control Board (Attn: Mr. Michael Bessette)
Raytheon Corporation (Attn: Mr. Eric Madera)
Schlumberger Corporation (Attn: Mr. V. Thomas Jones)
NASA Ames Research Center (Attn: Ms. Sandy Olliges)
MHB Technical Associates (Attn: Mr. Peter Strauss)

Blind copy to:

Moffett Field Environmental Office (Attn: LT Openshaw, Code 189)
PRC Environmental Management, Inc. (Attn: Mr. Michael Young)
Montgomery Watson (Attn: Dr. Joseph LeClaire)
09E, 09ER, 09ER5, 09ER5ST, 09ER5DC, 09ER5HC, 09CMN
Admin. Record (w/2 copies)
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Activity file: Moffett Field