



LEAGUE of WOMEN VOTERS

N00296.002327
MOFFETT FIELD
SSIC NO. 5090.3
LOS ALTOS - MOUNTAIN VIEW AREA
Hillview Community Center
97 Hillview Avenue, Los Altos, CA 94022
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August 29, 1995

Mr. Stephen Chao
Dept. of the Navy
Engineering Field Activity West
Naval Facilities Engineering Command
900 Commodore Drive, Building 208
San Bruno, CA 94066-5006

Dear Sir:

Subject: Comments on Moffett Field OU-1 Feasibility Study (FS)

The Leagues of Women Voters (LWV) of Los Altos, Los Altos Hills and Mountain View and of Sunnyvale-Cupertino know that the Navy is committed to meeting community standards as you proceed with environmental cleanup activities at Moffett Field. Community standards are high here. For the following reasons, the Federal government, the State of California, and local regulatory agencies have held polluters to a high standard of cleanup and remediation in Santa Clara County:

* Santa Clara County is the only urban county in California that relies upon groundwater for 50% of our drinking water. The Santa Clara Valley Water District is internationally known for its expertise in groundwater recharge, utilizing our vast underground aquifer system as a water bank.

* The southern end of San Francisco Bay south of Dumbarton Bridge is a unique ecological resource. Here the Bay is shallow with little flushing action either from tides or from heavy fresh water runoff, hence pollutants tend to build up in Bay sediments and wetlands. Since the South Bay is a major stop on the Pacific Flyway for migrating birds, the ecological health of the South Bay has far-ranging importance to not only the birds and the fish but to the food chain which supports them. While the San Francisco Bay is one of the world's great estuary systems, the South Bay may well be its most fragile component.

In light of the above circumstances, local governments and private industry in Santa Clara County lead the nation in investigating hazardous material spills, designing remediation and prevention strategies, studying aquifers, and in expending millions if not billions of dollars to cleanup past mistakes and to prevent future ones. Most Federal laws and regulations relating to leaking underground storage tanks, toxic gas management, and groundwater protection began here.

The LWV believes the OU-1 Feasibility Study is inadequate. Data gaps will not allow an appropriate design to be developed unless adequate answers to the following questions are incorporated.

I. Site Investigation Questions

A. What additional steps will be taken in the design phase to better define the outer perimeter boundaries of Sites 1 and 2?

B. What additional trenching and /or borings will be conducted in order to determine the lateral extent of the landfills prior to design of cap, leachate collection systems, and monitoring systems?

C. What criteria will the Navy use to conclude that boundaries of the sites have been reached? (e.g. no longer finding PCBs in the soil?)

D. Does the pistol range on the site present lead contamination problems or the danger to cap construction personnel from either soil contaminated lead or from possible live ammunition?

E. The OU-1 Remedial Investigation cited specific amounts of various hazardous materials that were buried in the landfills. This detail is missing from the OU-1 Feasibility Study. How does the Navy explain what happened to the following hazardous wastes disposed of in the Site 1 Landfill according to the OU-1 Remedial Investigation:

- * 110,000 gallons of TCE, toluene, methyl ethyl ketone (MEK), and solvents?
- * 368,000 pounds of ash?
- * 16,000 pounds of asbestos?
- * 24,000 gallons of paint, lacquer, and thinner?
- * 51,000 gallons of jet fuels
- * 3,300 gallons of waste oil in 55 gallon drums
- * 12,000 gallons of used lubricant oil
- * 1,260 gallons of transformer oil
- * 580 transformer filters
- * Sawdust contaminated with transformer oil?

Similarly, what has happened at the Site 2 Landfill to hazardous wastes disposed of there according to the OU-1 remedial investigation:

- * 75,000 to 150,000 gallons of TCE, toluene, MEK, and solvents
- * 69,000 pounds of ash
- * 16,000 pounds of asbestos
- * 43,500 gallons of paints, lacquer, and thinners
- * Unknown amount of waste oil buried in 55 gallon drums
- * Unknown amounts of used lube oil

I. Site Investigation Questions I-E. continued

- * 1,440 filters with fuel sludge, lead compounds and rust
- * 870 gallons of transformer oil
- * Unknown amounts of transformer oil filters
- * Unknown amount of sawdust contaminated with transformer oils possibly contaminated with PCBs?

II. Leachate Investigation and Management Questions

A. At Site 1 a significant gap (500+ feet) exists in the groundwater monitoring system. How many wells does the Navy intend to place in that "gap" in order to get a clearer picture of groundwater flow and possible leachate leakage? On what technical basis was that number of wells deemed adequate?

B. How will the Navy address possible vertical migration of leachate into lower level aquifers due to existence of porous material in the bases of the Site 1 and Site 2 landfills (sand lenses, peat layers, etc.)?

C. Is it accurate to say that part of the waste in the Site 1 Landfill is sitting in a combination of groundwater and leachate? If so, what are the environmental implications of this and what are the implications for design of an adequate leachate collection system?

D. If the waste in the Site 1 Landfill is currently partially immersed in groundwater/leachate, what type of barrier can be designed to prevent leachate from migrating into the adjacent slough, the Cargill salt ponds, and the storm water retention pond? (e.g. a slurry wall?)

E. Is it feasible to pump out and treat the groundwater/leachate at Site 1? What type of system could be used? How much would construction as well as operation and maintenance costs be for such a system? How long would it need to operate?

III. Financial Assurance Questions

A. What financial assurance mechanism will the Navy be using to assure sufficient funds are in place for closure and for 30+ years postclosure maintenance program for Moffett's four landfills?

B. If, over time, gas and groundwater monitoring programs reveal a need for corrective actions who will decide:

- a) when corrective action is necessary?
- b) what remedy is needed?
- c) how will the remedy be funded?

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III. Financial Assurance Questions continued

C. Will the Regional Water Quality Control Board have access to these funds for corrective action if the Navy fails to implement closure, postclosure maintenance or needed corrective actions (in a timely fashion)?

D. How will maintenance of the subdrain system at Moffett be funded and, if necessary, upgraded to prevent inundation of the landfills? What is the estimated cost for maintaining the subdrain system?

Note: we understand that the Moffett actions are governed by CERCLA but it makes no sense to us that a CERCLA site should be required to do less than a standard solid waste landfill since it presumably is a greater threat to public health and welfare and to the environment, otherwise why would it be governed by CERCLA?

The Leagues of Women Voters throughout California support comprehensive measures to provide maximum protection to human health and the environment from the adverse effects of hazardous materials, including pesticides. An integrated approach should be taken to prevent harmful exposures through soil, surface and groundwater contamination, bioaccumulation, air pollution, and direct contact. We believe all levels of government share responsibility for preventing exposures.

Frankly, we are disappointed in the OU-1 Feasibility Study and in the inadequate data base upon which it is based. However, we are convinced that the Navy, EPA, and community have learned a great deal in the course of this Feasibility Study review. As a result, future Moffett Remedial Investigations will include more complete data upon which to base the Feasibility Studies that follow. Finally, we believe that the public interest is best served by the Navy moving forward if the Record of Decision fully incorporates improvements in the project suggested by California regulatory agencies, local governments, and the community.

We appreciate the opportunity to comment and to be involved in the Moffett cleanup process.

Sincerely,

Crownie Billik
Muriel Knudsen

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Co-Presidents, Los Altos-Mtn. View Area LWV

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cc: Michael Gill, U.S. EPA
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