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MOFFETT FIELD
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Technical, Historical, and Educational Committee
Moffett Field Restoration Advisory Board
c/o James G. McClure
Harding Lawson Associates
P.O. Box 6107
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April 22, 1996

27437 007

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

Comments
Draft Operable Unit 1 Record of Decision
Moffett Federal Airfield

Dear Mr. Chao:

This letter presents comments from members of the Technical, Historical, and Educational (THE) Committee of the Restoration Advisory Board (RAB) for Moffett Federal Airfield (Moffett Field, formerly Naval Air Station Moffett Field). These comments pertain to the March 7, 1996, *Moffett Federal Airfield Draft Operable Unit 1 Record of Decision* (OU1 ROD). The OU1 ROD covers the Site 1 and Site 2 landfills.

First and foremost, members of the THE Committee were very concerned to learn at the April 11, 1996, RAB meeting that funding to permit the required capping of the OU1 landfills will not be available in the Fiscal Year 1997 (FY 97) budget. It appears from your presentation to the RAB that Moffett Field has received only approximately one-sixth of the Installation Restoration Program (IRP) funding needed for FY 97 to maintain progress toward the Navy's planned resolution of its environmental liabilities at Moffett Field. In light of current congressional funding priorities, members of the THE Committee believe that it may be unrealistic to expect that such a shortfall will be made up. In any event, it appears from your presentation that the Navy will unilaterally postpone capping of the OU1 landfills for purely budgetary reasons, and for an indefinite period.

The issue of the reliability of the Navy's commitment to clean up Moffett Field has been raised numerous times by the RAB. RAB members understand that funding of Navy environmental restoration work is different from funding of environmental work by private parties and subject to some constraints not entirely within the Navy's control. Nevertheless, at this early stage of the process, the denial of funding for so basic and uncontroversial a cleanup as landfill capping calls into question not only the Navy's ability and commitment to fulfill the terms of the OU1 ROD, but its commitment to fulfill all of its other obligations at Moffett Field as well. This serious problem must be addressed and the solution described in the ROD, or the credibility and community acceptance of the ROD may be compromised.

A related comment concerns provision for the long-term operation and maintenance (O&M) of the Moffett Field storm drain and subdrain system and the associated pump station at Building 191. The RAB has heard the Navy state on numerous occasions that the Navy's ability to provide for the long-

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term O&M of this system was problematical, although all parties agree that system operation is key to the success of Moffett Field remedial actions for OU1 and for other OUs. Members of the THE Committee believe that this issue is so important that it should be specifically addressed in the main body of the ROD and in the ROD Executive Summary, not just in the Responsiveness Summary. The news that funding for the landfill caps is not available reinforces this opinion. If current funding for the caps is unavailable, how can the community have confidence that the necessary long-term funding for the storm drain and subdrain system will be available?

The main body and Executive Summary of the OU1 ROD should explicitly state that radiological and groundwater characterization at Site 1, the Runway Landfill, is incomplete and that further field studies are planned to remedy this deficiency. The main body of the ROD should also clearly describe the process by which the data from these studies will be published and the steps available to the public to comment on the new data, the interpretation of the new data, and the implications of the new data for the planned remedy at Site 1. This is necessary to properly memorialize the promises made to the public by the Navy and by state and federal regulators concerning the resolution of deficiencies in the Site 1 characterization.

Members of the THE Committee are very concerned that the draft OU1 ROD conveys the incorrect impression that all material issues concerning OU1 remedy selection have been resolved. This is definitely not the case. For example, one of the most important assumptions underlying the selection and design of the Site 1 remedy, the assumption that the Site 1 landfill has not seriously affected underlying groundwater, remains to be proven. The community was promised that this deficiency would be addressed, and the Navy has produced a work plan to deal with the deficiency. This work plan and provisions to address other deficiencies in OU1 characterization should be explicitly memorialized in the main body of the OU1 ROD so that the ROD properly conveys the fact that the Navy has not completed an adequate characterization of OU1 and has obligations in addition to those now described in the main body of the ROD.

Thank you for the opportunity to submit comments on the draft OU1 ROD. Members of the RAB THE Committee would be happy to discuss these comments with the Navy at the next RAB meeting, or at any other mutually agreeable time.

Very truly yours,



James G. McClure, Ph.D., P.E.
Chair, Moffett Field RAB THE Committee

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