



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 2, 2001

Ms. Andrea Muckerman
BRAC Environmental Coordinator
Southwest Division, Naval Facilities Engineering Command
BRAC Operations Office
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8517

Dear Ms. Muckerman:

U.S. EPA has reviewed the *Navy's Revised Final Responses to Comments (RTC) on the Revised Final Stationwide Feasibility Study Report* (now Site 25), Moffett Federal Airfield, dated March 1, 2001.

We concur with the Navy that this RTC, as stated in Section 1.0 Introduction, "serves as the final documentation for the FS, with the exception of the NFA sites." The next primary document we expect to see should be the Proposed Plan for this site. We recommend Alternative 2, Excavation and Off-Site Disposal, as the Preferred Alternative for the Proposed Plan.

The RTC provides generally satisfactory responses to our prior comments on the Revised Final FS, and resolves the main issues of concern to EPA. We have worked together closely with you and the Regional Water Quality Control Board to reach the agreements and approaches reflected in the RTC regarding cleanup levels, chemicals of concern, monitoring requirements, ARARs, and institutional controls. We appreciate your efforts to seek resolution with us on our primary concerns.

There are several items we need to continue to refine as this project goes through the decision making and public review process. At this time, we believe that the appropriate ARARs have been identified for this site; in the instances where we are not in agreement we have employed an agree to disagree approach, with a technical solution. However, as we have discussed, the final ARARs determination that will be included in the Record of Decision will be refined, and concurred on by our respective legal counsels.

Also, we would like to work further with you to ensure that the final figures used in the Proposed Plan and ROD, to show the potential areas to be excavated, take into account all existing relevant data (a technical meeting would be appropriate).

We have appreciated the opportunity to work with you on this project and your efforts to keep the project on schedule. We look forward to the next steps, the Proposed Plan, public comment period and Record of Decision.

Please call me at (415) 744-1685 if you have questions or for further discussion.

Sincerely,



Roberta Blank
Remedial Project Manager

- cc: Dennis Mishek, RWQCB
- Sandy Olliges, NASA
- James McClure, RAB Representative
- Kevin Woodhouse, City of Mt. View
- James Boarer, MEW Co. Representative

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