



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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May 11, 2009

Mr. John Hill
Acting BRAC Environmental Coordinator
Navy BRAC Program Management Office West
1455 Frazee Road, Suite 900
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Subject: EPA Concurrence on the Action Memorandum, Non-Time-Critical Removal Action for the PCB Contamination at Installation Restoration Site 29, Hangar 1, Former Naval Air Station Moffett Field, Moffett Field, CA

Dear Mr. Hill:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced Non-Time-Critical Removal Action Memorandum for Site 29, Hangar 1 (Action Memorandum). Under this Removal Action, the Navy plans to remove the Hangar 1 siding and interior structures and apply a weather-resistant epoxy coating to the steel frame. EPA concurs with the need for this action to address the polychlorinated biphenyls (PCBs), asbestos and lead within the Hangar structure and its surrounding soils. Past weathering of the Hangar 1 building materials, particularly the siding, has released lead and PCBs to the environment posing, among other potential problems, a threat to ecological health at Site 25, the Eastern Diked Marsh and stormwater retention pond. In conjunction with the separate remedy to address existing contamination at Site 25, this Removal Action will help prevent future recontamination of Site 25. In order to carry out the selected Removal Action in the most efficient and effective manner, the EPA has highlighted (below) concerns related to the path forward for Site 29.

Removal Action Work Plan

EPA expects, as the next step for this Action Memorandum, that the Navy will be issuing a comprehensive work plan that includes the following elements:

- 1) Protective measures to ensure that during the Removal Action contamination from the Hangar 1 structure does not impact nearby areas, including the concrete pad and storm drain pathways to Site 25;
- 2) Post-Removal Action confirmation sampling for lead, asbestos and PCBs to verify that the above areas have not been impacted;
- 3) Detailed information describing the weather-resistant epoxy coating including an evaluation of how the coating will fare when exposed to the elements for a long period of time; and
- 4) A monitoring plan outlining the maintenance and inspection of the structural steel

frame, including any delegation of responsibility.

Institutional Controls

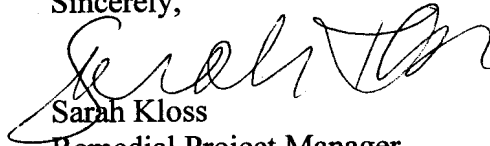
Because at the completion of this Removal Action, PCBs and lead will remain in place within the Hangar structure, the Navy will need to implement institutional controls to, among other things, ensure continued maintenance and inspection of the epoxy coating on the steel frame of the Hangar. In addition, the following issues may need to be addressed through institutional controls:

- 1) Ensuring future users are not impacted by potential contamination beneath the Hangar related to historical activities, including aircraft maintenance.
- 2) Ensuring use of an appropriate sampling and disposal protocol related to future disposal of the concrete pad itself.
- 3) Land use controls to limit future use to industrial/commercial uses.

Because institutional controls were not analyzed in the Engineering Evaluation/Cost Analysis (EE/CA) or Action Memorandum for this Removal Action, such controls need to be analyzed in a focused Feasibility Study.

Finally, as a step towards planning the final path to site closure, please provide a revised schedule for Site 29 including all the necessary follow-up CERCLA documentation for the site. We look forward to continuing to work with the Navy as we progress toward a final remedy at Site 29.

Sincerely,



Sarah Kloss
Remedial Project Manager
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