



CENTER FOR PUBLIC ENVIRONMENTAL OVERSIGHT

A project of the Pacific Studies Center

278-A Hope Street, Mountain View, CA 94041

Voice: 650-961-8918 or 650-969-1545 Fax: 650-961-8918

[<lsiegel@cpeo.org>](mailto:lsiegel@cpeo.org)

<http://www.cpeo.org>

January 21, 2011

Scott Anderson
BRAC Environmental Coordinator (BEC)
Former NAS Moffett Field

Deb Feng
Center Operations Directorate
NASA Ames Research Center

Dear Scott and Deb:

On behalf of the Hangar One Subcommittee of the Moffett Field Restoration Advisory Board, I offer the following specific questions and requests in the hope that the resulting clarifications will lead to the preservation of Hangar One's windows. While most of the letter is directed to the Navy, certain questions call for a reply from NASA.

At the Moffett Restoration Advisory Board (RAB) meeting of January 13, 2011 you indicated your willingness to work with the community to develop new options for preserving the Hangar One windows. The RAB and the community we represent appreciate that commitment.

We would like to set up a meeting of the Hangar One Subcommittee with the Navy and NASA in early February to go over your responses. As time is of the essence in this manner, please confirm by February 1 that the Navy and NASA will be able to support this meeting so we can set a date. In the interim, members of the Subcommittee will make themselves available by telephone or e-mail.

1. Please describe AMEC's removal action under the base contract. For example, we believe AMEC's planned action may be as follows:

- a) Remove screws that secure window assemblies to the structural window frame.
- b) Remove window assemblies, made up of glass, painted steel frames, and putty, from the structural window frame without further disassembly.
- c) Lower the window assemblies to the hangar floor.
- d) Disassemble window assemblies.
- e) Remove PCB-contaminated putty so the glass can be sent to the non-toxic Altamont landfill.
- f) Strip the PCB-contaminated paint from the steel frames so they can be sent to the non-toxic Altamont landfill.
- g) Transport remaining contaminated materials (putty, other?) to the Kettleman Hills hazardous waste landfill.

We understand that may not be an accurate sequence of events. Please correct as needed. We don't need a lot of detail; just enough to understand what work is planned.

2. Please describe AMEC's removal action under the \$1.2M contract option. We need a level of detail as above. What changes under the contract option? What remains the same? What accounts for the \$1.2M cost?

3. Please confirm that the \$1.2M contract option includes preservation of only the upper corrugated windows, not the flat glass windows on the lower level?

4. NASA: Please explain why the flat glass windows were not included in the contract option? Were they determined not to have historic value? If so, who made that determination and on what basis?

Navy: Please consider both corrugated and flat glass windows in your responses to these questions and to the RAB's request for alternative preservation ideas.

5. At the RAB meeting, AMEC contradicted our understanding from the Navy that the putty had been tested and found to contain PCBs. Mike Schulz stated that only five samples had been taken, of which one was positive for PCBs, and he believed that positive result may have been "a flake of paint." Please describe the testing that has been performed to determine whether the putty is contaminated and the findings of that testing?

6. What testing will be performed as part of the removal action in future? Will the putty and the paint on the frames be tested? When will that testing occur?

7. Please confirm our impression that the disposition of the removed windows depends, in part, on further testing for PCBs and other contaminants? For example, we understand that the goal is to dispose of the bulk of the material in the less-expensive Altamont landfill, hence the cleaning of the windows and the stripping of the frames to remove the sources of PCBs, lead paint, and so on. Is that right?

8. We understand from the AMEC presentation that Altamont can accept materials containing asbestos or lead, but not a significant level of PCBs. Is that correct? What is the Altamont landfill's limit on PCB content? We understand TSCA specifies 1 ppm. Is that the limit for Altamont? What standard will be applied, when the windows are tested further, to determine whether additional decontamination is required before disposal at Altamont?
9. Overall, what regulatory requirements does Navy apply for disposal of PCB, asbestos, and lead-contaminated materials, such as the painted window frames and caulking? Has Navy consulted with DTSC and EPA to ensure the correct standards are applied?
10. Assuming the product of the removal action is "clean" materials destined to the Altamont landfill, please describe any impediments to an alternative disposition for some or all those materials? For example, would it be feasible, rather than transporting the glass to Altamont, to instead transport it to a NASA storage site at Moffett Field? If not, why not?
11. NASA: We are informed by NASA that a storage site at Moffett has been identified and would be available for storage of at least the glass. Please confirm that's true?
12. Please confirm or correct our impression that transporting the clean glass a shorter distance to storage will save money, all other removal action steps being equal? If not, please describe in general the additional costs involved?
13. NASA: Please confirm that NASA wishes the Navy to preserve at least the corrugated and flat glass, assuming it is free of contamination, and assuming any additional costs can be covered?

Sincerely,

(submitted electronically)

Lenny Siegel
Chair, Hangar One Subcommittee
Executive Director, CPEO

Cc:
Moffett Field Restoration Advisory Board (RAB) Members
Rep. Anna Eshoo